



A/Committee Secretary
Health and Environment Committee
Parliament House
George Street
Brisbane Qld 4000
Email: hec@parliament.qld.gov.au

RE: Environmental and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 2021

Dear Committee,

The Australian Marine Conservation Society (AMCS) thanks you for the opportunity to make a submission on this *Environment and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 2021* (Bill).

AMCS is the leading charity devoted solely to caring for Australia's oceans and their wildlife. AMCS has over 250,000 members and supporters in Australia (30% in Queensland) whom we represent and work with on key marine issues facing the nation. One of core focus areas is to protect our Great Barrier Reef (Reef) from threats, particularly the two greatest threats; global warming and poor water quality.

Our Reef is an international icon and one of the world's most beautiful and biologically rich ecosystems on earth. Prior to Covid-19 impacts, our Reef provided \$6.4 billion to the economy every year and supports over 64,000 jobs. Yet despite its international and national economic, social and environmental significance, its health is still in decline.

Addressing water quality is a critical international commitment that the Queensland and Australian governments made to the World Heritage Committee (WHC) in 2015 to avoid placing the Reef on the *World Heritage In Danger* list. At the time, Australia's commitment to address their concerns was the joint Commonwealth-Queensland *Reef 2050 Plan*. Since then, on-ground actions to address climate change and water quality have been too slow, the Reef has suffered three-devastating bleaching events in the last five years, the Australian government has not made a commitment for net-zero emissions, and actions to voluntarily improve water quality have been unhurried. In response to this inaction the WHC [announced](#) on 22 June 2021, it's draft decision to now place the Reef on the *World Heritage In Danger*

list¹. This potential listing may have devastating impacts for industries that rely on a healthy Reef and reiterates the importance of the commitment to improve water quality entering our Reef.

The Queensland government should be commended for acting on the recommendation of the Great Barrier Reef Science Taskforce which was to implement strengthened regulations, in stages, to reduce water pollution throughout Reef catchments. Recommendation 5² of the report states clearly the case for regulation:

“..to be an important part of the mix of policy instruments to accelerate progress towards meeting the Reef water quality targets. Across many sectors in society there is a consistent pattern that voluntary practices either by industry or individuals need to be underpinned by adequate regulation to bring about changes in behaviour or improved management outcomes”.

Currently, the management of the Reef is one of the best national and international examples of science-informed, evidence-based adaptive management enhanced by regular and public reporting. Further, there is ample evidence based on good, quality assured, regularly reviewed and updated science to show that there is an urgent need to minimise the impacts of land-based pollution, and that the agricultural industries in the Reef catchments all need to be part of this solution.

The overwhelming scientific consensus on the detrimental impacts of poor water quality to our Reef is settled after decades of thorough investigation and research. This fact is reflected in the numerous plans to protect the Reef, most of which have bipartisan political support, including:

- The [Reef 2050 Long Term Sustainability Plan](#)³, which sets the long-term (2050) outcome that ‘Good water quality sustains the Outstanding Universal Value of the Reef, builds resilience, improves ecosystems health and benefits communities’.
- The [Reef 2050 Water Quality Improvement Plan](#)⁴ (WQIP) which identifies how the above mentioned outcome will be delivered to improve Reef water quality.
- The [2017 Scientific Consensus Statement](#)⁵, reviewed every five-years, is synthesised from ~2001 scientific studies on best available evidence, from 48 scientists with expertise in Reef water quality science and management. The Statement, provides the most comprehensive, consolidated analysis and synthesis of the evidence linking the impacts of water runoff from both agricultural and urban–industrial land uses. Furthermore, there is strong evidence linking the impacts of farm water runoff on the health of the Reef and adjacent catchment areas, for example 78% of the anthropogenic load of dissolved inorganic nitrogen is from sugar cane.

¹ <https://whc.unesco.org/archive/2021/whc21-44com-7B.Add-en.pdf>

² <https://apo.org.au/node/66427>

³ <https://www.gbrmpa.gov.au/our-work/reef-strategies/reef-2050>

⁴

<https://www.google.com/url?q=https://www.reefplan.qld.gov.au/&sa=D&source=editors&ust=1624605480980000&usg=AOvVaw0GaCPy71cO1oOxjTNU-2YC>

⁵ <https://www.reefplan.qld.gov.au/science-and-research/the-scientific-consensus-statement>

- The *Great Barrier Reef Marine Park Authority Outlook Report 2019*⁶, is published every five years after thoroughly examining the Reef's health, pressures and likely future. The 2019 report is the third in the series and identifies the greatest threats to the Reef's health as climate change and polluted land-based run-off. Polluted land-based run-off from agriculture remains the greatest contributor to poor water quality in the inshore areas of our Reef.

These numerous plans support the consensus that the decline of marine water quality associated with land-based run-off from adjacent Reef catchments is a major cause of the current poor state of many coastal and marine ecosystems. AMCS is particularly concerned about the impacts from excess nutrients from fertilisers and sediment, that runs-off from land and into creeks and rivers and eventually into our inshore Reef habitats. This nutrient and sediment rich run-off is harmful to our inshore Reef ecosystems and the species that depend on them such as our threatened and vulnerable turtles and dugongs⁷:

- When too much fertiliser is applied to crops or plants that do not take up the excess fertiliser, it leaches into groundwater and washes into nearby rivers and waters, where it is carried out to the inshore areas of our Reef. Nitrogen from these fertilisers are linked to harmful algal blooms, which reduces the amount of sunlight available to seagrasses and corals and restricts their growth and health. Algal blooms also deplete oxygen levels in the water, this process is known as eutrophication.
- When vegetation is cleared for agricultural development or grasslands are overgrazed the removal of the vegetated cover causes soils to erode and wash into nearby creeks and rivers that run into our Reef. Sediment discharged from rivers into inshore areas of our Reef reduces the sunlight available to, and can smother, seagrasses and corals.

Good quality water is critical for our Great Barrier Reef's health. We don't have time to waste, we need to ensure urgent and rapid compliance with the existing Reef protection regulation to give the inshore ecosystems of our Reef the quality of water it needs to survive, sustain its Outstanding Universal Value and build resilience to warming waters.

The regulatory component of the *Environmental Protection Act 1994 – Great Barrier Reef protection measures* (Reef protection regulations), that commenced in December 2019, provides the necessary framework for tackling the pollution that is harming our Reef. The simple, yet impactful Reef protection regulations have set pollution load reduction targets, minimum practice standards and new permit requirements for the expansion of agriculture in Reef catchments, to ensure there is no further decline in water quality, whilst allowing for economic growth in the agriculture sector. The regulations were designed and rolled-out in stages over three years, targeting the highest impact activities first for cane, bananas and graziers. The regulations, both in regards to practice change requirements and timeframes, have been very reasonably implemented and only target high risk pollutants such as nitrogen and sediment. It is important to note pesticides are not included in the Reef protection regulations, which conflicts with the “*Policy objectives and the reason for them*” argument presented in this Reversal Bill [Explanatory Notes](#). Further, when water quality

⁶ <https://www.gbrmpa.gov.au/our-work/outlook-report-2019>

⁷ <https://www.marineconservation.org.au/pollution-great-barrier-reef/>

targets are shown to be met, such as in the [Cape York region in 2019](#), the reasonable regulatory response is to maintain current loads and further interjection is not required.

The Australian and Queensland governments have committed a significant amount of funding towards improving water quality for the Great Barrier Reef. Important progress has been made, including with adoption of voluntary initiatives, however the Reef Report Cards⁸ show that the load reductions are not on track to achieve the 2025 targets. It is clear now that the 2025 water quality targets cannot be met by relying solely on voluntary adoption of best management practices. The 2019 GBR Report Card shows that, after more than a decade (baseline was established in 2009), 36.2% of grazing land and 12.7% of sugarcane land is using best management practice systems— both of these land uses have a target of 90% of land at best management practice systems by 2025. So, whilst many farmers are participating and making a difference, others are not. Those not participating are essentially undermining the effort and investment made by their peers.

Regulation has been a necessity for many landmark initiatives and is already used extensively within the Great Barrier Reef to limit the impact of industries such as tourism, fishing and aquaculture. Farming should be no different to other regulated industries that operate near or on the Reef. The [Queensland government compliance reporting](#) is demonstrating that compliance and enforcement is a necessary component of improving water quality and land management practices. On average, approximately 45% of landowners are compliant with regulations on first visit by an authorised officer. This number increases to 66% on second visit; showing that repeat compliance visits are successfully increasing uptake of the regulations and demonstrating the regulatory approach is necessary.

We need strong laws to ensure all farmers and graziers achieve minimum standards and that highly polluting practices are phased out. AMCS strongly supports the effective Reef protection regulations, as the key piece in government policy, to help get practice change on track to achieve the water quality targets. Effective regulations along with long-standing government and industry investment supporting adoption of best management practices, provides the right policy and investment mix to achieve the 2025 water quality targets.

AMCS urges the committee to refuse the *Environment and Other Legislation (Reversal of Great Barrier Reef Protection Measures) Amendment Bill 2021* to help safeguard the future of our Reef and to recommend improvements to ensure the achievement of the 2025 water quality targets.

Yours sincerely



Jaimi Webster
Great Barrier Reef Water Quality Manager
Australian Marine Conservation Society



⁸ <https://www.reefplan.qld.gov.au/tracking-progress/reef-report-card>