

*A voice for the environment*

Committee Secretary
Transport and Resources Committee
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Re: Inquiry into the economic and regulatory frameworks for Queensland's island resorts

Thank you for the opportunity to make comment to the inquiry into the economic and regulatory frameworks for Queensland's island resorts.

Capricorn Conservation Council (CCC) is the leading non-government, environmental organisation in Central Queensland. CCC has been advocating for the environment since 1973 and has a particular interest in ensuring that all land use is sustainable and does not significantly impact on the environment. The Great Barrier Reef islands within our geographic area of focus extend from the Capricorn Group in the south through to the Percy Isles in the north, and includes the Keppel Islands and Broad Sound group where most of our local resort development has historically been focussed.

We have limited our comments to those terms of reference for the inquiry that relate to our interests.

Historical operational status and existing constraints that impact economic development opportunities for island resorts

There are two large-scale and abandoned resorts (Great Keppel Island and Iwasaki Capricorn Integrated Resort) that have previously operated within our geographic area of interest. Both of these resorts have left a negative environmental legacy through the loss of vegetation, foredunes and wetlands, the remains of collapsed buildings and infrastructure, and now with no ongoing land management resulting in weed and feral species invasion. There are no large-scale tourism resorts currently operating in our region.

In addition, tourist developments have previously been constructed on Wild Duck and North Keppel islands, but neither of these were ever opened and have been transferred to State ownership for education and conservation purposes.

By contrast, smaller eco-friendly tourism developments currently operate on Pumpkin and Great Keppel Island with these tourist destinations operating for many years. Likewise, camping areas within national parks on GBR islands are relatively sustainable.

CCC considers that a thorough assessment of the reasons that large-scale tourism resorts have failed in this region is important to fully understand if they can ever be sustainable in Central Queensland. The natural values of islands, and the surrounding Great Barrier Reef Marine Park (GBRMP), are easily impacted by development. CCC believes that any tourism development on GBR islands must protect the natural values of the area and not simply seek to maximise short term profits and subsequently leave an adverse environmental outcome.

Some of the matters we believe need to be considered include:

Tenure management

We do not support the conversion of public land on GBR islands to freehold, but there are some complexities with leasing that need to be resolved. In particular:

- Any lease conditions must also apply to any sub-lessees with clear responsibilities for meeting these conditions,
- Lease conditions must include the sale of the development or the removal of stranded assets within a reasonable timeframe following the closure of a resort development,
- There needs to be a defined responsible department for compliance to ensure environmental conditions are being met,
- The management of the lease area in the event of resort closure requires a mechanism to ensure that the environment and aesthetics of the development are managed. This may be achieved through a financial security combined with the resumption of the lease when conditions are not adhered to,
- Where approvals are granted for a new development, or the revitalisation of a previous development, timeframes and conditions must be adhered to or the lease revoked (an issue we are facing on Great Keppel Island), and
- Exclusive use of beaches by coastal resorts must be prohibited (an issue in our region with the Iwasaki Capricorn Integrated Resort, and
- Areas of the island located outside the approved extent of development must not be directly or indirectly impacted by development. This requires a suitable tenure and funded compliance monitoring to prevent unintended impacts.

Residential development

- The primary purpose of island 'tourist resorts' should not be residential development,
- Resort developers must demonstrate prior to approval that the resort will be viable without secondary residential development and that any residential development is directly associated and required for the operation of the resort,
- Development approvals must ensure that, if there is a residential component, the tourism infrastructure must be constructed first, and
- No residential development should occur on protected area estate.

Environmental management

- Lease conditions must be the strongest possible to minimise impacts to the on-shore and off-shore environments. This must include matters including, but not limited to:
 - Pest and weed management,
 - Restriction on plants and animals that can be introduced to the development, specifically species which are likely to become environmental weeds, pest animals or will threaten the endemic ecosystems,
 - Monitoring of threatened or locally significant plants and animals,
 - Appropriate waste reduction and management,
 - Power supply which is self-sufficient and emission-neutral. The method of electricity generation must not adversely impact on island or the Great Barrier Reef World Heritage Area (GBRWhA) values,

- Provision of adequate water supply,
 - Treatment and disposal of waste water,
 - Management of lighting, particularly when near turtle nesting beaches,
 - Provision of relevant environmental information packages to customers.
- Again, there needs to be a defined responsible department for compliance to ensure environmental conditions are being met.

Infrastructure access arrangements and other challenges for lease holders to develop or redevelop islands for tourist, residential and public purposes

For the purposes of responding to this term of reference, CCC considers that access infrastructure may include barge landings, jetties, airstrips, moorings and in some instances, developed marinas. We acknowledge that the scope of this term of reference may also include additional infrastructure access (some of which we have made comment on in our response above).

It is important to recognise that the GBR islands are within the GBRWHA and are surrounded by the Great Barrier Reef Coast Marine Park (GBRCMP) to high water mark and the GBRMP to low water mark. Many of the islands in our region are also designated national parks.

Given the natural coastal processes that occur along the Queensland Coast, CCC is of the view that any coastal access infrastructure must:

- be essential to the tourism development and operation,
- not significantly impact on natural coastal processes or require significant modification of foredunes and beaches,
- have no more than very minor impacts on the Reef and landscape values, and
- be well managed with contingencies in place should they become stranded assets.

We acknowledge that coastal access infrastructure requires approvals from federal, state and sometimes local government. The environmental assessments required for these approvals should guide decision-making which focusses on protecting the significant environmental, cultural or landscape values of the GBRCMP, GBRMP and GBRWHA.

In relation to coastal access arrangements, CCC recommends that it is made clear to potential tourism proponents that, in addition to the points above:

- No marina developments are to be constructed on national park islands,
- Any jetty structures allow for natural sand movement and do not typically provide night lighting when on or near turtle and shorebird nesting beaches, and
- The preference for barge landings is to use matting rather than hardstand construction.

In relation to aircraft strips or helicopter landings, CCC recommends that it is made clear to proponents that airstrips and helipads:

- must not be established in locations which would require the clearing of significant vegetation communities, plant or animal species habitat, or within any protected area estate,
- must be located to avoid interference with migratory and other significant bird species, and
- must be located near the tourism development to minimise the development of vehicle tracks through native vegetation.

Co-existence with the protected area estate both onshore and within the Great Barrier Reef Marine Park Area

As outlined in our above comments, CCC considers that any development on GBR islands must ensure that impacts on the values of the GBRWHA, GBRMP, GBRCMP, protected area estate and species and communities of conservation significance are minimal. It is also essential that any development does not detract from ecosystem functioning and landscape aesthetics (the mantra, “don’t destroy what you’ve come to enjoy” is relevant here).

In relation to onshore protected area estate, CCC notes that of the land area in Queensland, less than 8.5% is within protected area estate which is far lower than the target of 17% of land area. Any developments on or adjacent to protected areas must be consistent with park management plans, must not impact on the values of the protected area, and natural/ecological values must override economic drivers. In addition, any development must be in keeping with the international, national and State recognition of the important environmental ecosystems and landscapes which [“have a fundamental and critical influence on the values”](#) of the World Heritage Area.

Where tourism developments occur under a *Nature Conservation Act 1992* lease, or is adjacent or close to public land managed for conservation and recreation, the developer should contribute to development and maintenance of walking tracks where tracks are heavily used by resort guests.

Thank you for the opportunity to make a submission and I trust that you will consider our comments and keep us informed as the inquiry proceeds.

Yours sincerely



Dr Coral Rowston

On behalf of the Capricorn Conservation Council management committee
