

Scientists submission matches LACA's almost word for word!:

<http://www.theguardian.com/environment/2014/oct/27/great-barrier-reef-protection-plan-ignores-threat-climate-change>



Reef 2050 Long-Term Plan Submissions

Department of the Environment

Canberra ACT 2601

27 October 2014

Logan and Albert Conservation Association (LACA) submission on the Long Term Sustainability Plan for the Reef:

Thank you for the opportunity to comment on the LTSP for the Reef.

LACA cannot support the Reef Long Term Sustainability Plan in its present form because the current draft LTSP for the Reef fails to measure its proposals against the terms of the World Heritage Convention to protect the Great Barrier Reef World Heritage Area (GBRWHA) 'to the utmost of [its] resources' (Article 4 of the World Heritage Convention).

This level of protection will only be achieved through the underpinning provided by a series of genuine, hard decisions that must be taken first by both State and Federal Governments.

These decisions are:

1. Recognising as the LTSP does that climate change is the greatest long term threat to the Reef, the Queensland and Federal governments must decide to design and implement, as soon as possible, an ambitious, world-leading climate change mitigation program well beyond the 5% emissions reduction target currently in place which is hopelessly out of step with action emerging around the world. As a first step, associated plans on climate change and its consequences for both the marine environment and coastal catchments should be developed and tabled with the LTSP at the UNESCO Congress in June 2015.
2. As part of the hard decision process needed to save the Reef from inevitable decline, State and Federal Governments must move now to transition away from coal mining and export. The majority of Queensland's coal reserves should stay in the ground. Port development should cease, existing ports made more environmentally benign, and Reef shipping should decrease.

3. A clear, unambiguous and permanent decision must be made by both State and Federal Governments to end dredging and dumping in reef waters, including the inner lagoon environment.

4. The Queensland State Government must decide now to reinstate and strengthen the former vegetation management Act. If the tree clearing loopholes and weakened compliance regimes around vegetation management introduced in 2013 remain it will be impossible for the LTSP to achieve its stated aspirations around water quality entering the Reef environment.

5. Environmental Legislation around coastal and catchment protection in this state has been considerably weakened since 2012. Unless a decision is made by the Queensland State Government to greatly strengthen these, the LTSP will operate from an impossibly weak base. In this context the draft LTSP as it stands is based predominantly on a 'business-as-usual' approach. When weakened environmental legislation is combined with significant budget and staff cuts to the government agencies that oversee and implement key Reef related management programs, it is clear that the LTSP is simply being set up to fail to achieve its stated objectives. The seriousness of this issue has been illustrated by the Queensland Audit Office which recently raised significant concerns about government failures to adequately administer and enforce existing approval conditions.

6. The Queensland State Government must decide now to scale up farm run-off regulations, making them mandatory and subject to strong compliance measures, rather than voluntary as they are now. Reduction in farm pollution is recognised in the LTSP as critical to secure the future health of the Reef. However, if Queensland and Australian government plans for future expansion of agriculture don't address water quality impacts, under current voluntary practice, increases rather than decreases in Reef pollution will be inevitable.

7. Both Governments need to decide to eliminate the concept of 'offsets' from the LTSP. Australia has agreed to protect the WHA property to the utmost of its resources; hence net benefit, implying that a real loss of values will be somehow 'offset' by an apparent gain elsewhere, has no place in a world heritage area where the purpose is to protect and conserve (and rehabilitate) nature in its discovered complexity, not to progressively minimise its diversity and rearrange its values through the concept of offsetting.

8. Governments should stop ranking impacts on the Reef in order of severity, as appears in the LTSP, and make the firm decision to embrace the concept of cumulative impact as a core component of the LTSP. All impacts contribute cumulatively to the decline of the reef and therefore each must be addressed as part of the whole. UNESCO has asked for a commitment to a deeper understanding of cumulative impacts including consequential impacts.

Without clear decisions on these issues from both arms of Government the LTSP for the Reef remains simply a blue print for failure.



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