



October 10, 2005

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Great Barrier Reef Marine Park Act Review

Dear Madam/Sir

The Great Barrier Reef Marine Park (GBRMP) is currently the best example of a large multi-use Marine Protected Area anywhere in the world. This is unequivocal proof that the best management regime available is the current model, that is the Great Barrier Reef Marine Park Authority (GBRMPA) as an independent statutory authority with the powers to manage the GBRMP based in the GBR region'.

While transparency in management decisions and mechanisms for public consultation are vital, consultation with vested interest stakeholder groups should be kept to a minimum. GBRMPA's role should primarily be the protection and conservation of the Marine Park, which won't always be in the best financial interest of some stakeholders. For this reason engagement processes that allow stakeholders with a vested financial interest to place undue pressure on the GBRMPA should be minimised.

There should be greater transparency in the permitting process, currently many approvals are granted with little or no public consultation. All permits for extractive processes, discharge, dumping and activities that could cause environmental harm should be published on the GBRMPA website and open to public consultation.

There is no assessment of cumulative impacts in the Great Barrier Reef Marine Park Act 1975 (GBRMP Act). The cumulative impacts of development or other activities such as coral collecting and waste disposal must be considered. The EPBC Act has provisions for the consideration of cumulative impacts. The GBRMP Act should be amended to include similar provisions.

At present, the GBRMP Act has no third party rights that enable person with a proven interest in environmental issues to take enforcement action in regard to breaches of the Act. Standing rights for third parties inline with those of the EPBC Act must be included in any amendments to the GBRMP Act.

Currently penalties imposed for breaching GBR Regulations are less than those imposed under the EPBC Act. These penalties should be increased to match those of the EPBC Act.

The GBR is worth approximately 6 billion dollars to the Australian economy each year, making it an important asset for Australia. It is also a huge asset for the companies granted the privilege of operating in the Marine Park. Permit fees should reflect the value of this asset, as should the funding the GBRMPA receives to manage and protect this



asset. There should be an urgent review of permit fees to ensure that appropriate revenue is generated to properly resource GBRMPA.

Important areas of the GBR World Heritage Area are not included in the GBRMP i.e. Hinchinbrook Channel. The GBRMP Boundary should be amended to include all of the GBR World Heritage Area.

The Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) has proven to be woefully inadequate at mitigating adverse impacts from activities outside the GBRMP. Serious consideration should be given to increasing the powers available in the GBRMP Act to address these impacts.

The GBR has already suffered degradation from climate change related impacts and will continue to do so in the future. It is vital that future management decisions regarding the preservation of the GBR are made using the best available science, are free from political influences and take full account of the Precautionary Principle.

It is my view that the existing arrangements for the management of the GBRMP should be retained with no substantial change. However consideration should be given to the following points.

- GBRMPA must remain an independent statutory authority with the powers to manage the GBRMP and continue to be based in the GBR region.
- Increased powers in the GBRMP Act to address offsite impacts
- Review of permit fees for commercial activities.
- Review of current funding for the GBRMPA to enable good management and enforcement.
- Better processes regarding public consultation and transparency for permit applications and approvals
- Minimisation of consultation processes that could allow stakeholders with a vested financial interest to unduly influence decision making processes
- The GBRMP Boundary should be amended to include all of the GBR World Heritage Area.
- The GBRMP Act should be amended to include similar provisions for the consideration of cumulative impacts.
- Penalties for breaching GBR Regulations should be increased to match those of the EPBC Act.

Yours Sincerely

A handwritten signature in black ink that reads "James Crawford". The signature is written in a cursive, slightly slanted style.

James Crawford