



20 July 2011

EPBC Referrals

Queensland Section

Approvals and Wildlife Division

Department of Sustainability, Environment, Water, Population and Communities

GPO Box 787 Canberra ACT 2601

Dear Minister Burke and Staff,

RE: EPBC referral No. 2005/2502 – Hummock Hill Island – proposed refusal decision

The Capricorn Conservation Council (CCC) is the principal not-for-profit environment and conservation organisation in Central Queensland. CCC was founded in 1973 and has been actively campaigning on regional environmental issues ever since. CCC is a community based conservation group with a membership of people concerned about environmental issues.

CCC supports the Minister's proposed decision to refuse the residential and tourist development project on Hummock Hill Island in the Great Barrier Reef World Heritage Area (GBRWHA). CCC agrees wholeheartedly that the potential environmental impacts associated with the proposed development are unacceptable and far outweigh any social or economic benefits. Therefore, CCC urges the Minister to uphold and finalise the decision to refuse this development project on Hummock Hill Island to ensure the protection of this unique and undeveloped Island, its high environmental values and those of the surrounding marine environment.

It is our belief that the proposed development would have unacceptable and irreversible significant impacts, both direct and consequential, to the GBRWHA, migratory species, and threatened species & ecological communities as outlined in the Departmental Advice¹ regarding the project.

CCC supports and agrees with the following statements in the Departmental Advice Executive Summary that "the Department² is not satisfied that the impacts of the proposal can be adequately mitigated or offset" and "overall, the department considers that the impacts would be unacceptable". Furthermore we support and agree with the information provided within the Departmental Advice regarding significant impacts to the Littoral Rainforest & Coastal Vine Thickets, the Water Mouse, Black Breasted Button Quail, Grey-headed Flying-fox, Green Turtle, Loggerhead Turtle, Flatback Turtle, Eastern Curlew, Dugong, Indo-Pacific Humpback Dolphin & the GBRWHA.

¹ The Department of Sustainability, Environment, Water, Population & Community (DSEWPC) document titled "Departmental Advice relating to the proposed refusal decision for the Hummock Hill Island Development (EPBC 2005/2502)", is referred to throughout this letter as the Departmental Advice.

² Department is the DSEWPC. DSEWPC is referred to throughout this letter as the Department.

Floristic diversity

CCC supports and urges the protection that an upheld refusal decision will give to the vegetation communities (Regional Ecosystems or RE's) of Hummock Hill Island which only occur at this most southern location within the GBRWHA. Of particular conservation importance to CCC are the following Regional Ecosystems; (1), a Silver-leaf Ironbark and Blue Gum community on granitic hills (12.12.12 and 12.12.8) that are believed to be endemic to HHI, are 'of concern' status in Queensland and is geologically quite rare; (2), a Blue Gum woodland (12.3.3) and a Poplar box (12.3.10) woodland on alluvial plains immediately adjacent to mangroves and sand dunes, which share an 'endangered' conservation status in Queensland; and (3), 190 hectares of EPBC Listed Littoral Rainforest & Coastal Vine Thicket (beach rainforest) on coastal dunes.

We urge you to ensure the protection and conservation of the values and condition of the Regional Ecosystems and Threatened Ecological Communities on Hummock Hills Island by upholding and implementing your refusal decision. Further specific comments relating to the values of these Regional Ecosystems are outlined below.

Poplar Box woodland (12.3.10)

CCC would like to emphasise the importance of the Poplar Box (*Eucalyptus populnea*) communities on alluvium. This is the only known location where this regional ecosystem (RE) occurs in the northern subregions of the South-eastern Queensland bioregion and it is the only known location where this regional ecosystem occurs in a coastal context. Most importantly the HHI extent of this RE provides 98% of the total extent in the GBRWHA and on a state level, the HHI extent equates for 30% of the Queensland extent. The only other known locations of this ecosystem have closer affinity to the Brigalow Belt alluvial poplar box community (RE 11.3.2) than the 12.3.10 on Hummock Hill Island. Quoting the Queensland REDD database, the comments include: "confined to western margins of bioregion" and "*Eucalyptus populnea* is one of the species characteristics of the broad overlap between the Southeast Queensland and Brigalow Belt bioregions".

Blue Gum and Iron Bark Regional Ecosystems (12.12.12, 12.3.3 and 12.12.8)

CCC believes the Blue Gum and Iron Bark Regional Ecosystems (RE's) on Hummock Hill Island are of state and national significance when their location within the GBRWHA is considered. The Blue Gum RE's (12.3.3 and possibly 12.12.12) have special significance in providing mature hollow bearing Blue Gum trees for faunal habitat. RE's 12.12.8 (Ironbark) and 12.12.12 (Blue Gum & Ironbark) have a very limited distribution and extent within the GBRWHA as identified within the Departmental Advice; of even more significance is the fact that these RE's on Hummock Hill Island currently provide 86% (12.12.8) and 99.7% (12.12.12) of their extent within the GBRWHA and the proposed clearance amounts of these two RE's on Hummock Hill Island would result in a drastic and unacceptable 50% reduction in their extent in the GBRWHA.

Offsets

The Departmental Advice acknowledges and discusses the proponents proposed offsets for clearing 313 hectares of remnant vegetation on page 17. CCC would like to emphasise the point that the proponent noted the difficulty in addressing impacts through direct offsets. Most importantly CCC would like to provide further comment and advice to the Department that we do not agree with, nor accept potential offsets proposed on Casuarina Island and the property "Fitzroy Vale" for the following reasons:

- Casuarina Island is located in the river delta of the Fitzroy River and is predominantly intertidal marine plains, with some very small remnants of Beach Rainforest (SEVT or Littoral Rainforest

on its most eastern end) and Blue Gum tall open forest, and the DERM coastal hazard maps indicate that Casuarina Island would be inundated in its entirety by predicted sea level rises and storm surges of 0.8m to 1m by 2100 or earlier.

- “Fitzroy Vale” is a pastoral and grazing property located on the northern banks of the Fitzroy River in the estuarine section, approximately 20+ kilometres up river of the mouth. “Fitzroy Vale” is predominantly cleared and appears not to be suitable for major direct offsets as it would have to involve revegetation and replanting as opposed to managing existing remnant or regrowth.
- CCC opposes the direct net loss of quality, high value and high condition remnant Regional Ecosystems for offsets that are essentially a recreated version of the Regional Ecosystem through replanting measures, given the challenges and difficulties to recreate and re-establish a functional replication of an ecosystem.

CCC further notes that the proponent has identified that they are working with Liquified Natural Gas (LNG) facility holders to provide joint, shared offsets. CCC believes that a potential offset site property called “Balnagowan” is being researched by LNG facility holders for their own offset requirements. Historically, “Balnagowan” was formally part of “Fitzroy Vale”, however we believe this is no longer the case. CCC notes that “Balnagowan” has much higher values and potential for real offsets, although again DERM coastal hazard maps indicate this property will have significant areas inundated with storm surge and sea level increases (Littoral Rainforest would be significantly affected and possibly destroyed).

General and conclusive statements on floristic diversity

The building of a bridge from the mainland to Hummock Hill Island, accompanied by building of the proposed residential & tourism accommodation/services, provides an unacceptable gateway for pest plants and animals to access and infiltrate the Island’s high value regional ecosystems. This would result in detrimental and irreversible impacts to vegetation, flora and fauna species via the direct threats of competition (with weeds for indigenous flora spp.) and predation of native fauna by feral animals (eg. cats and dogs). Specifically, populations of vulnerable fauna species on the island, such as the Black Breasted Button Quail, Water Mouse, Eastern Curlew and Grey-headed Flying-fox, are not in a position to survive the impacts of such major threats (nor habitat or forage removal) and their population size and extent would be negatively impacted by the development.

For the reasons outlined above, CCC opposes the removal of these Regional Ecosystems (12.3.3, 12.3.10, 12.12.8 and 12.12.12) and any residential or tourism development on HHI because these activities would introduce threatening processes to these Regional Ecosystems (such as edge effect, weed invasion, altered hydrology & fire regimes) that would significantly reduce their long term viability, conservation value and ability to provide ecosystem services in the GBRWHA and Queensland. These and all other Regional Ecosystems and Threatened Ecological Communities on the Island need to be protected against such threats; this can only be achieved by conservation estate status as a National Park.

Furthermore, to uphold the refusal decision would also provide the necessary protection to the high values of the little disturbed coastal and estuarine communities in the Hummock Hill Island precinct which feature undisturbed mangroves and sea grass beds and include the rich estuarine life of the deep Colosseum Inlet and the shallows of 7 Mile Creek and Rodds Bay.

Threatened Ecological Communities - Littoral Rainforest

CCC firmly believes that the 190 hectares of the critically endangered (EPBC Listed) Littoral Rainforest & Coastal Vine Thicket (of Eastern Australia) on Hummock Hill Island and the high conservation values it provides must be protected and not subjected to community fragmentation, edge effects, invasive exotic species, altered hydrology and fire management regimes that would occur with the Island development ; we urge the Minister to uphold the refusal decision to ensure the protection of this most threatened ecological community. This (190 hectares) is one of the largest examples of this threatened ecosystem and furthermore, it also provides essential habitat for the Black Breasted Button Quail (a specialist inhabitant of this vegetation) & foraging vegetation for the Grey-headed Flying Fox, both of which are listed as 'vulnerable' species under the EPBC Act.

CCC supports the Departmental Advice that, "regardless of the mitigation measures implemented, permanently converting an undeveloped island to a tourism and residential community,....is likely to result in long-term and substantial changes to the condition and status of the occurrences of this ecological community." We ask the Minister to give great consideration to the degrading threats outlined above and listed in the Departmental Advice under EPBC Act Policy 3.9 (for this ecological community), and to uphold the refusal decision to protect this ecological community.

Threatened species – Water Mouse

Given that the Water Mouse is known to occur on Hummock Hill Island, and there is 809 hectares of essential habitat for the species occurring on the Island, CCC asks that the Minister uphold his proposed decision to refuse the development so as to protect and conserve the population and habitat of the Water Mouse on the Island. CCC believes that whilst the size and importance of the Island population has not been identified by the proponent, the precautionary principle should be applied to prevent the potential threats from construction and operation of the project, as listed in the Departmental Advice, from reducing the essential habitat and population size (and survival) of this threatened species.

Threatened species – Black Breasted Button Quail (BBBQ)

CCC agrees with the Departmental Advice that should the proposed action proceed, it would "increase the identified threats to the BBQ occurring on Hummock Hill Island and would be inconsistent with two specific objectives detailed in the recovery plan of the species" and "whilst a number of the mitigation measures proposed by the proponent..... will reduce impacts, they will not be able to mitigate them completely". Again, CCC urges the Minister and Department to implement the precautionary principle for the BBBQ sub-population on Hummock Hill Island so that direct and indirect impacts associated with the proposed development are prevented, specifically the high risk for increased mortality of adult birds and chicks and the viability of the Island sub-population.

Threatened species – Grey-headed Flying Fox

CCC believes that the proposed offset on the mainland within the foraging range of the Turkey Beach population of the Grey-headed Flying-fox is not an acceptable mitigation measure; there will still be a net loss of high value foraging habitat on Hummock Hill Island.

CCC agrees and supports the information provided in the Departmental Advice that the "loss of substantial foraging habitat will impact local populations of the Grey-headed Flying-fox and potentially impact the long term viability of the endangered ecological community Littoral Rainforest and Coastal Vine Thickets of Eastern Australia". Given that the extent of these impacts are not clear or apparent at this time, CCC urges the Minister and Department to implement the precautionary principle and uphold

the refusal decision to prevent the potentially devastating impacts to the long term viability of this species and the threatened ecological community.

Threatened species – Green, Flatback & Loggerhead Turtles

CCC supports the departmental information that Hummock Hill Island may provide habitat critical for the survival of the Green, Flatback & Loggerhead Turtles including home nesting beaches (natal beaches), inter-nesting habitat & feeding habitat (seagrasses).

CCC supports and applauds the Departmental Advice that the mitigation measures proposed by the proponents for reduced speed limits of 6 knots per hour for increased boat traffic associated with the development, will not be sufficient to significantly protect marine turtles & dugongs from the increased risk of boat strike (evidence suggests that 2 knots is the requirement for turtles to be able to avoid boat traffic, however this would not be practical to implement), therefore the two new boat ramps (recreational) at Colosseum Inlet & Rodds Bay should not be allowed to proceed.

Migratory species

Hummock Hill Island sits within the largely undisturbed portion of the Port Curtis Island – Rodds Bay Dugong Protection Area (DPA). The Northern half of the Rodds Bay DPA (Port Curtis Boyne River to the Narrows) is currently subject to intensive dredging, marine vessel movement, industrial construction and port activities. There is emerging evidence that this section may no longer be clearly providing secure protection for dugong, other marine mammals and sea turtles. For example, there has been 3 dugong deaths, 3 Indo-Pacific dolphin deaths & 48 sea turtle deaths in the past two-three months in the Gladstone-Curtis area and the Rodds Bay DPA.

CCC supports and agrees with the Departmental Advice that the proponent's mitigation impacts for the habitats of turtles and other marine fauna (such as dugong and Indo-Pacific Dolphin) "will not mitigate impacts completely". It is CCC's belief that the mitigation and reduction of impacts and the improved information proposed by the proponent in their list of monitoring and mitigation measures, is not sufficient enough to ensure the protection of the habitats of turtles, dugongs and dolphins in the southern section of Rodds Bay DPA. CCC upholds that the precautionary principle be followed in this case by finalising the decision to refuse the development, thereby preventing further impacts to these habitats and species in Rodds Bay DPA.

GBRWHA

CCC, like the Department, does not agree with the Coordinator-General's single conclusive statement about the development and impacts on the world heritage values of the GBRWHA that "while the development would have an impact on world heritage values, impacts on natural resources and key species are minor and largely mitigated by the proponent's commitments".

The proponent offered to fund a study to the value of \$150,000 to identify management priorities in the Mackay-Capricorn region, with a focus on continental islands. CCC agrees with the Department's comment that "such a study is an important step" and most importantly, "the study does not, however, address the impacts potentially created by this project."

CCC agrees with and strongly supports the comment in the Departmental Advice regarding visual amenity that "the department considers that as the region surrounding the island becomes more industrialised, the natural state of Hummock Hill Island is likely to become more greatly valued and more important on a local and regional scale". Further to this comment, CCC believes that Hummock Hill Island is already important and greatly valued for its natural assets at a local, regional and state level.

CCC agrees with the comments made in the departmental advice regarding the uniqueness of Hummock Hill Island. Particularly, we support the comment that “regardless of any mitigation or offset measures proposed by the proponent, this development would result in the permanent conversion of this island from an undeveloped to a developed state. There would be no undeveloped islands of this size left in the GBRWHA south of Shoalwater Bay.”

The high value of the relatively undisturbed coastal and estuarine communities in the Hummock Hill Island precinct which feature undisturbed mangroves and sea grass beds, and includes the rich estuarine life of the deep waters of Colosseum Inlet and the shallow waters of 7 Mile Creek and Rodds Bay, need to be protected. Upholding a refusal decision will assist to protect these values of the GBRWHA and a recommendation to classify the island as National Park would ensure these values are protected, supported and enhanced.

Water Quality

CCC opposes plans for desalination plants, emergency sewage treatment discharge and increased hard surfaces on the island. The proposed discharges and hydrology changes would have an impact to marine water quality in the surrounding GBRWHA, Rodds Bay DPA, national wetland and fishing habitat despite the proposed mitigation measures. Of particular importance is the impact of increased hard surface areas (increased run off) with the development, and the total impact combined with saline discharges and nutrient level discharges (sewage treated water) to the marine ecology/ecosystems of sea grass beds, coral reefs and benthic communities, and the consequential impacts to food sources for threatened/endangered Dugong, Sea Turtles and cetaceans. Given the increased industrialisation of the northern section of Rodds Bay DPA with gas and port facilities, which includes the loss of approximately 500 hectares of sea grass beds with dredging and reclamation works, it is far too risky to impose such an impact to the southern area of the DPA and the threatened marine fauna which depend on the health of these marine ecosystems.

Tourism & Population Growth

Population growth within the Gladstone Regional Council can economically and environmentally be best supported by expanding on existing urban areas and townships. Tourism in the Great Barrier Reef Region & GBRWHA would be best focussed on small scale ecotourism that is considerate and valuing of the regions high natural values, rather than large scale residential suburbs posing as tourism that devalue and greatly impact the regions high natural values.

The principles of ecological sustainable development (ESD)

CCC agrees wholeheartedly with the statements provided by the Department on pages 25-26 for the 5 principles of ESD taken into account in the preparation of the Departmental Advice; this includes the integration principle, the precautionary principle, the intergenerational principle, the biodiversity principle and the valuation principle.

CCC would like to further improve upon the Departmental Advice for the valuation principle; CCC agrees with the general statement of the Department that “the refusal of this proposal would promote the viability of alternative development with lower environmental costs”, but we would like to expand on this and strongly suggest that the most appropriate development that would ensure all the other 4 ESD principles are upheld in to the future is a National Park. Limited visitation and/or camping managed by DERM as a National Park, with a similar management style to that of Hinchinbrook Island in the northern GBRWHA, would ensure that the World Heritage Values of the area are at the fore of the Island’s management.

CCC urges the Minister Tony Burke and both State and Federal Governments to make a stand now and protect the biodiversity, ecological & World Heritage values of Hummock Hill Island and its surrounding GBRWHA waters/area, by gazetting it as a National Park.

Conclusion

Hummock Hill Island has many natural assets at the regional, national & international level that make it worthy of long term conservation and protection. CCC believes that National Park status for Hummock Hill Island would enhance the biodiversity, natural landscape values, ecosystem function and aesthetic appeal of the current adjacent coastal protected area estate. The current proposed development would detract from these values and cause irrevocable, permanent change to the GBRWHA, threatened species, threatened ecological communities, migratory species and the Rodds Bay DPA. We urge you to refuse this development application and take measures to ensure Hummock Hill Island becomes a National Park.

Yours sincerely

Chantelle James
Project Officer