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SUBMISSION ON THE GBRMPA DRAFT TOURISM MANAGEMENT ACTION STRATEGY

To the Great Barrier Reef Marine Park Authority,

On behalf of the Whitsunday Conservation Council (WCC), please accept this submission on GBRMPA Draft Tourism Management Action Strategy.

The WCC is a non-profit, Whitsunday based umbrella organisation working with a large number of Whitsunday based conservation groups.

You will find that our comments on the Draft Tourism Management Action Strategy support a healthy Whitsunday Tourism Industry, but more importantly, support a healthy Great Barrier Reef, no doubt reflecting the same goals as GBRMPA.

The proposed GBRMPA Draft Tourism Management Action Strategy is, coming off the back of three major coral bleaching events and COVID-19, both timely and much needed.

For the past few years, GBRMPA has gone to great lengths to highlight the serious pressures impacting the Great Barrier Reef. The list of impacts is daunting. As noted by GBRMPA, the most serious problem facing the Reef is climate change, a global problem requiring both a local and global response.

But the impacts of tourism, although small compared to climate change, should not be ignored. In fact, this strategy should support a tourism industry that not only has minimal impact on the Reef but, through leadership provided by GBRMPA, is actively engaged in building Reef resilience.

Our submission includes:

I. General Comments

II. Specific Comments on the Outcomes, Objectives and Actions

III. Key Recommendations

I. GENERAL COMMENTS ON THE DRAFT TOURISM MANAGEMENT ACTION STRATEGY.

General Comment 1: Times have changed. GBRMPA's current tourism management strategy and available tools are no longer effective. Currently, **flexibility** and **agility** are not strong points for GBRMPA but are now imperative to build and retain reef resilience and combat the effects of climate change.

GBRMPA needs the ability to quickly close sites, open sites, change zones, adjust settings, change boundaries and more.

Recent history has shown that the current GBRMPA legislation is a barrier to achieving the necessary flexibility and agility. The obvious solution, although not simple, is to amend and update the legislation. Bring GBRMPA into 2021 and beyond.

Under the section Purpose and Scope, the Draft Strategy notes that this document "*will guide the review, simplification, deregulation and rationalisation of our tourism policies and other management tools...*" We believe that this statement is contrary to realising the Outcomes, Objectives and Actions listed in this Strategy. **Simplification, deregulation and rationalisation of policies and management tools will make it more difficult if not impossible to meet the goals of this Strategy.**

General Comment 2: This strategy should build a more resilient Great Barrier Reef through the stewardship provided by the Reef Tourism Industry. GBRMPA must continue to support tourism operators with the necessary training to undertake stewardship activities.

WCC notes that Objective 2.1 *establishes benchmarks for lowest-possible impact appreciation of the Reef.* We believe that tourism activities should have a nett positive impact (build resilience) on the Reef. No offsets allowed.

General Comment 3: The Draft Tourism Management Strategy notes that it does not include any review of the permit system which is dealt with under another policy. However, permits are seen as part of the tourism management problem in the Whitsundays. (Action 1.1.1 does note that the Permit System needs a review.)

The permit system is nearly as old as GBRMPA and is well past its use-by date. Put simply, it provides too many loopholes for too many tourism operators to run substandard operations and retain their permits indefinitely.

The permit problem is multi-faceted.

PROBLEM 1: There are too many permits in the system, many not being used but the potential to literally overrun the Whitsundays remains. To date, GBRMPA has been unsuccessful in significantly reducing the number of permits in the system.

SOLUTION: Continue with the permit cap. Significantly reduce the number of unused permits in the Whitsunday region.

PROBLEM 2: It is too easy to get a permit (purchasing an existing permit). The bar is set far too low and little scrutiny of the potential tourism operator's credentials occurs. This is true for the entire GBRMP, not just the Whitsundays. To operate in the Great Barrier Reef World Heritage Area is a privilege which must be earned. Currently, many permitted operators have no idea how to run a sustainable activity in the Whitsundays and show little respect for the environmental values of the GBR.

SOLUTION: Raise the bar of entry. Require permit applicants to meet minimal operational standards including but not limited to: all staff with Reef Interpretive Training, sustainable activity audit, recycling and plastic reduction program.

PROBLEM 3: Once an operator has a permit, that operator (standard or high standard) has an obligation to live up to the requirements of the permit. This is not always the case. Operators not meeting the permit requirements should forfeit their permit. The audit and compliance program is not as effective as it should be.

SOLUTIONS:

- More resources spent on an effective auditing and compliance program.
- Permits should be reviewed annually with consideration given to performance of the operator. Suggest a demerit system could be implemented, similar to Australian road rules, which would lead to loss of permit.
- Consideration should be given to the health of the local reef system and permissions adjusted accordingly.
- "Historical use" should no longer be considered when issuing or renewing a permit as this practice can lead to unnecessary ecological and social impacts over time.
- All permit holders required to earn the high standard tourism operator certification within their first 3 years of operation or lose their permit.
- To encourage tourism operators to continually raise their environmental game, GBRMPA should create another level above the current high standard tourism operator. The Master Reef Guide program is an excellent starting point to build knowledge for tourism operators and tourists alike. A Master Reef Guide should be required crew for all tourism operators.

General Comment 4: Given the geography and popularity of the Whitsundays (lots of people in small areas), GBRMPA must consider both the ecological and social (experiential) sustainability of the region to determine how much tourism the popular locations can handle (carrying capacity). Over the past 5 years, many popular snorkeling destinations have been lost due to cyclones, bleaching and shark attack. This has led to increased numbers (and pressure) in the few remaining bays. WCC would suggest that some bays are approaching or perhaps even exceeded limits.

WCC would suggest that this should be a priority project for GBRMPA as the effectiveness of any future tourism strategy will depend on this information.

It is important to note that the Whitsunday marine environment has changed significantly over the past 10 years due to poor water quality, COTS, cyclones and climate change. WCC feels that in determining ecological and social sustainability, one must consider a more pristine environment and not the current environment. It is not time to move the goal posts.

Regarding Hill Inlet, during public consultation for the Whitsunday Plan of Management (1994), the Whitsunday Local Marine Advisory Committee, advised GBRMPA that Hill Inlet should be closed to all but non-motorised boat traffic (both commercial and recreational). Given the current popularity, ecological and cultural importance of this site, WCC would ask that GBRMPA revisit this suggestion.

General Comment 5: A not so small and quite significant elephant in the room is Recreational Use of the GBRMP. This issue obviously falls outside the scope of the Draft Tourism Management Action Strategy but cannot continued to be ignored. Currently, we have very little information on recreational use. But we do know that recreational users tend to mirror commercial tourism operations in regards to activities, favourite sites and environmental and social impacts.

As noted in General Comment 4 above, GBRMPA must develop a comprehensive understanding of the ecological and social sustainability of the Whitsundays. However, that information would be of little value if one were to ignore the recreational use of the area. A recreational user kicking coral does just as much damage as a commercial tourist kicking coral.

In fact, it could be argued that recreational users present more environmental risk to the GBRMP than a commercial tourist because the recreational user does not have the benefit of reef briefs or guides.

General Comment 6: The timing to 2035 to achieve these goals is cause for concern, and is neither contemporary nor agile. Given the threats to the reef and tourism industry we are currently facing, it can easily be argued that we do not have the luxury of 14 years to adequately address our environmental, economic and social challenges. In becoming more agile, GBRMPA also needs to become more responsive from a time perspective. Notwithstanding the need for rigorous controls to prevent any accidental irreversible environmental damage, legislation cannot continue to impede much needed faster adaptation and proactive actions. At the very least the action items listed should have some measurable delivery timeframes applied to each, linked to corresponding accountability of the Authority to deliver.

General Comment 7: Regarding the Guiding Principles, these are all agreed. What GBRMPA needs to show is how they are going to be achieved, and how we measure success and deliverability.

WCC would suggest adding one new Guiding Principle: The Precautionary Principle; where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

General Comment 8: Another important issue that falls a bit outside GBRMPA's jurisdiction is vessel sewage in the Whitsundays. We have a large commercial fleet and an equally big recreational fleet but no adequate sewage pump-out facilities. This problem has been with us for decades and the various government agencies simply pass the buck to the next government agency. This problem will only get bigger in the future. WCC would ask GBRMPA to take the lead on this serious problem and work the problem.

II. SPECIFIC COMMENTS ON THE DRAFT TOURISM MANAGEMENT ACTION STRATEGY. These comments are focussed on the **Implementation of the Plan** (starting on page 18, Table 1).

- Generally, agree with all Outcomes, Objectives and Actions. Exceptions and amendments noted below.
- Outcome 1 refers only to ecological sustainability. Tourism management in the marine park needs to also consider social sustainability.
- Action 1.1.1 is urgent. This system and these policies must not just be reviewed, but reviewed with expediency and adequate resulting action.
- Objective 1.2 highlights the need for **active and adaptive** management but only Action 1.2.6 touches on this. As noted in Comment 1 above, GBRMPA needs the ability to quickly close sites, open sites, change zones, adjust settings, change boundaries and more.
- Objective 1.1.4 is essential to properly educate tourism operators as a minimal level of environmental knowledge is currently not a prerequisite for permit holders.
- Objective 1.1.7 suggests use of vessel tracking equipment. This has proven to be an effective compliance tool in the commercial fishing industry and should fill the same purpose in the tourism industry.
- Action 2.1.2 indicates that tourism operators require incentives to reduce their impacts. This suggests that impacts are acceptable. Impacts are not acceptable. The Action should read: *Develop incentive-based programs along with compliance measures to ensure positive contributions from tourism to the marine environment.*
- Action 2.1.4 should read, *“introduce auditable minimum standards of tourism operations in legislation and management tools.”* We should be well past “examining opportunities”.
- Action 2.2.2 should read: *Require all tourism operators to achieve high standard tourism operator status/certification within 3 years the start of their operation.*
- Action 2.2.9 states: *Proactively identify, develop and apply compliance tools to divert, manage and deter activities that detract from the high-standard presentation Reef experiences.*

Not entirely clear on what this Action means. Assuming that any tourism operator breaking the rules, best practices, codes of conduct (i.e., feeding bread to fish) will face consequences. If so, strongly agree.

- Objective 3.1 should include an action that states: All tourism operator’s staff must receive training in the local indigenous history.

III. KEY RECOMMENDATIONS

Recommendation 1: Active and adaptive (agile) management that quickly responds to changing ecological, social and economic issues affecting the Reef. GBRMPA legislation amended as necessary to meet the demands of 2021 and beyond.

Recommendation 2: All tourism activities should have a nett positive impact (build resilience) on the Reef. No offsets allowed.

Recommendation 3: Immediate and thorough review of the Managing Tourism Permissions to Operate in the Great Barrier Reef Marine Park (including allocation, latency and tenure) Policy.

- **Recommendation 3.1:** Continue with the permit cap. Significantly reduce the number of unused permits in the Whitsunday region.
- **Recommendation 3.2:** Raise the bar of entry. Require permit applicants to meet minimal operational standards including but not limited to: all staff with Reef Interpretive Training, sustainable activity audit, recycling and plastic reduction program.
- **Recommendation 3.3:** More resources spent on an effective auditing and compliance program. Permits should be reviewed annually with consideration given to performance of the operator. The health of the local reef system should also be considered and permissions adjusted accordingly.
- **Recommendation 3.4:** All permit holders required to earn the high standard tourism operator certification within their first 3 years of operation or lose their permit. To encourage tourism operators to continually raise their environmental game, GBRMPA should create another level above the current high standard tourism operator.
- **Recommendation 3.5:** A Master Reef Guide should be required crew for all tourism operators.

Recommendation 4: A priority project – determine the ecological and social (experiential) carrying capacity for the popular snorkelling destinations in the Whitsundays.

Recommendation 5: A priority project – determine the impacts of recreational use of the Whitsundays.

Recommendation 6: GBRMPA must develop a comprehensive understanding of the impacts of recreational use of the Whitsundays. This information must then feed into the Tourism Management Action Strategy.

Recommendation 7: Implementation of the Tourism Management Action Strategy must occur as soon as possible. 2035 is far too late.

Recommendation 8: Add one new Guiding Principle: The Precautionary Principle; where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.

Sincerely,



Faye Chapman
Secretary

For addition information or comment please contact;

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