

3 November 2014



Environment Institute
of Australia and
New Zealand Inc.

The Secretary
Department of the Environment
PO Box 787
CANBERRA ACT 2601

By email: GBRlongtermpplan@environment.gov.au

Dear Sir

Re: Draft Reef 2050 Long Term Sustainability Plan

The Environment Institute of Australia and New Zealand (EIANZ) is pleased to submit its comments on the Draft Reef 2050 Long Term Sustainability Plan (Reef 2050).

The EIANZ acknowledges the ongoing efforts being made by the Commonwealth and Queensland governments to address the management of the Outstanding Universal Value (OUV) of the Great Barrier Reef World Heritage Area (GBRWHA).

Reef 2050 does not however provide a strong, outcomes focused basis for reversing the current trend of degradation of many of the component environmental values of the OUV of the GBRWHA. Reef 2050 lacks the sense of urgency and the potency of action appropriate to the ongoing decline of biodiversity and the ecosystem health of the GBRWHA.

The EIANZ is concerned that Reef 2050 plan continues to put off decisions about the type and scale of use and activity that may be acceptable in the GBRWHA and in catchments that drain to it. Despite the Strategic Assessments (SAs) or the latest GBR Outlook report no commitments are given to placing constraints on use and activities in the GBRWHA.

The commitments given to investment in research on "critical thresholds" and cumulative impacts is welcome. The EIANZ is surprised that it will take until 2016/2017 to bring into effect the proposed integrated monitoring and reporting program. Such a delay is inconsistent with institutional capacity to undertake the necessary monitoring and reporting if adequately funded, and an unacceptable approach to understanding the changing ecological status of the OUV of the GBRWHA given the downward trends reported in the latest GBR Outlook Report.

GPO BOX 211 MELBOURNE VIC 3001
Tel: 03 8803 6150
Email: office@eianz.org
www.eianz.org

ABN 39 364 288 752 | NZBN 9429041314777

Reef 2050 presents a vague and imprecise approach to ongoing management. The objectives, targets and actions are often worded loosely, leaving the implementation and achievement of these open to wide interpretation. Timeframes are rarely specified. There is a lack of quantitative targets and the targets fall well short of being "clearly defined and scientifically justified". This is unacceptable given the wealth of information and expertise already available to assist with the setting of clear and measurable targets.

The target setting framework used in Reef 2050 of Outcome, Objective, Targets and Actions is structured around set time periods. This is inconsistent with maintaining a sense of urgency about the achievement of the objective of reversing the decline in the key component environmental values of the GBRWHA OUV. Setting trajectory based targets that recognize the history of biophysical condition and the concurrent human investment in managing the parameter would be much more appropriate.

It is unclear how the proposed actions in Reef 2050 contribute to managing the OUV of the GBRWHA, and reversing the already identified current downward trends in key component environmental values. Reef 2050 does not seem clearly linked with the findings of the Strategic Assessments (SAs) or the latest GBR Outlook report. Both of these indicated ongoing decline in biodiversity values, ecosystem health and other indicators, and the SAs committed to strong action to reverse that decline.

EIANZ considers that the segmented and mechanistic management approach reflected in Reef 2050 is not appropriate to dealing with the management of a complex ecosystem with strong inter-connection to other areas and systems. The success of the plan will be heavily dependent upon the success of the concurrent and equally sophisticated environmental management of broader, coastal, estuary, freshwater (not just water quality) and oceanic zones. This level of complexity and inter-connectedness appears not to be well recognized in the framing of the plan.

The context in which Reef 2050 will operate is highly dynamic, from a social, political and ecological point of view. Revisions of the plan are to occur only every five years. This will likely result in adjustments to planning provisions lagging up to five or more years behind their recognition as being significant contributors to the management of the GBRWHA. Real time monitoring and reporting would better promote ongoing vigilance and adjustment of actions. Capacity for this vigilance and authority to make strategic changes needs to be articulated in the arrangements for governance of the plan.

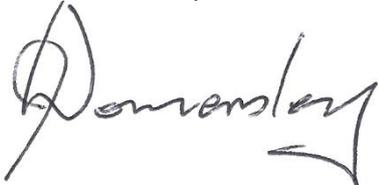
The governance framework remains unclear, particularly in relation to the terms of reference for, powers and functions of and funding for the various committees that are mentioned throughout Reef 2050. Funding amounts and sources are not clear. There should be a clear commitment to a five year investment program associated with the plan, on the basis that the first three years are firmly committed. Without an adequate funding commitment, the EIANZ considers

that Reef 2050 is unlikely to be a potent source of change and see improvement in the management of the OUV of the GBRWHA.

The EIANZ is the leading professional body in Australia and New Zealand for environmental practitioners, and promotes independent and interdisciplinary discourse on environmental issues. The Institute advocates good practice environmental management delivered by proficient and ethical environmental practitioners as a response to issues of resource stewardship, environmental degradation, and sustainable development. The EIANZ's detailed comments (attached) focus on the soundness of the objectives targets and actions in Reef 2050 as a basis for achieving sustainable good practice environmental management of the GBRWHA OUV and reversing the current downward trends in key component environmental values.

The EIANZ would be pleased to assist in and contribute to the further development of Reef 2050. I can be contacted directly on 0457 509 201 or at president@eianz.org.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Jon Womersley', with a stylized flourish at the end.

Jon Womersley
President