



Department of  
**Environment and  
Heritage Protection**

Our ref: CTS 21526/16 and referral EPBC 2015/612

25 AUG 2016

Dr Gordon de Brouwer  
Secretary  
Department of the Environment and Energy  
GPO Box 787  
CANBERRA ACT 2601

Dear Dr de Brouwer

### **EPBC 2015/612 – Toondah Harbour revitalisation Project**

I refer to the letter of 12 August 2016 from the Honourable Jackie Trad MP, Queensland Government Deputy Premier and the Honourable Dr Steven Miles MP, Minister for Environment and Heritage Protection to the Honourable Josh Frydenberg MP, Minister for the Environment and Energy.

That letter confirmed the Queensland Government's support for the revitalisation of Toondah Harbour near Brisbane, and our government's support for your Minister to declare the Walker Group Holdings Pty Ltd project proposal at this site as a Controlled Action under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* (EPBC Act).

I am writing as a follow up to that correspondence to provide further information to your Department to assist in preparing your advice to your Minister on this matter.

The Queensland Government's support for this important project is of course contingent upon a rigorous assessment of environmental impacts by both Commonwealth and State Governments, and compliance with all necessary and appropriate environmental requirements and controls.

As the part of the project is within the Moreton Bay Ramsar site, it has been referred to your Minister by Walker under the EPBC Act (referral EPBC 2015/612). I note that the Ministerial decision on this referral has been suspended a number of times since December 2015 and is now expected on 2 September 2016.

In 2013, Toondah Harbour was declared a Priority Development Area (PDA) under the *Economic Development Act 2012* by the former Queensland Government. This declaration was at the request of the Redland City Council to accelerate and support employment and economic growth in the Redlands area by providing opportunities for new residential, tourism and retail development as well as revitalisation of the existing ferry terminal area and the creation of more public open space. **The PDA area includes approximately 0.05% of the Moreton Bay Ramsar wetland area.**

The existing ferry terminal facilitates more than a million passenger and 200,000 vehicle movements annually between the mainland and North Stradbroke Island, and has not been upgraded since it was built in the 1970s. The terminals are at capacity with urgent need for expansion, additional car parking and upgrades to operational and customer infrastructure. The swing basin and channel require regular dredging due to siltation and need to be deepened and widened to support existing and future capacity.

A fundamental upgrade is required to minimise user conflicts, improve safety, ensure minimal impact to the environment and cater for the future growth of the ferry terminals and associated car parking in line with the expected tourism growth.

Further, the State has recently passed legislation to cease sand mining on North Stradbroke Island to honour the Indigenous Land Use Agreement made with the Quandamooka People. To transition the island community, an economic transition strategy has been prepared, outlining funding opportunities for workforce retraining and employment and providing suitable mainland infrastructure to support the aspiration of the Quandamooka people and broader community for the growth of sustainable tourism industry. 18% of local workers on the island are employed in mining; a targeted economic strategy is necessary to ensure ongoing employment opportunities for these workers after 2019.

**The redevelopment of Toondah Harbour in the next few years therefore has unique significance; the revitalisation of marine transport infrastructure and tourism facilities, services and infrastructure is fundamental to ensure the successful economic, social and cultural transition of North Stradbroke Island and to provide a resilient ecotourism-based future for the Quandamooka People and other island residents in place of sand mining.**

In 2014, the State and Council publicly tendered the development rights over government land in the PDA with Walker being identified as the Preferred Proponent. We believe that Walker's project proposal is of national economic, social and cultural importance as it would support over 1,000 jobs per annum over a 15-20 year construction phase and give rise to an estimated \$1.39 billion in direct benefits and \$2.33 billion in indirect benefits, with Gross Regional Product benefiting by \$34.8 million per annum.

When completed, the project would provide over 500 direct jobs per annum across on-site office, retail, hotel and other sectors. Preliminary estimates of the broader impact on the tourism industry show that an extra 49,300 visitors will be brought to the region, staying 90,580 visitor nights and generating an estimated additional visitor expenditure of \$21.64 million per annum, which will support a further 500 jobs in the region.

Walker's proposal will deliver \$116 million of new and upgraded infrastructure for the local community at no cost to ratepayers or taxpayers, including dredging and widening of the Fison Channel, new terminals for passenger and car ferries, new ticketing and information centre, bus interchange, new public car park facilities with additional capacity to support the ferry terminals, retail and residential development. This will enable Toondah Harbour to continue and expand its operations to meet future tourism demands. A new public waterfront urban plaza with contiguous waterfront boardwalk promenade and creation of significant additional public open space with new facilities, walk and cycle ways and upgrades to existing parkland will enhance the lifestyle of the community and improve facilities and access to the bay.

I understand that a key issue in your advice in relation to the potential declaration of the project as a Controlled Action under the EPBC Act is the potential impacts on the Ramsar Wetlands.



The Moreton Bay Ramsar site includes wetlands on North Stradbroke Island such as 18 Mile Swamp which has been threatened at times by sand mining. Indeed, I understand that many Ramsar referrals to the Australian Government in Queensland are related to sand mining on North Stradbroke Island. **The State's commitment to close sand mining on the island will eliminate these threats to the Moreton Bay Ramsar site from 2019 and beyond.**

Moreton Bay was listed as a Ramsar site by the Australian Government in 1993 following recommendation by the then Queensland Government. The Queensland Government is responsible for day-to-day management of the site and preparation of formal Ramsar documentation including Ramsar Information Sheet which sets out the ecological character of the site and its boundary.

In defining a proposed boundary in the early 1990s, a number of assumptions were made by the then governments regarding future use and development patterns in and around the Bay. It is now recognised that the Ramsar boundary actually includes the existing regularly-dredged swing basin and public navigation channel. In hindsight, this area should have been excluded from the Ramsar Wetland consistent with other areas subject to historical disturbance or identified for future development for public infrastructure that were excluded such as Brisbane Airport and the equivalent harbour at Dunwich (on North Stradbroke Island).

There is also an area excised from the Ramsar site that adjoins the PDA directly south. This was probably intended to cover the then understanding of future port operations or a development proposal at the time. **These historical mapping anomalies are now compromising the revitalisation of Toondah Harbour and potentially threatening the realisation of the vital re-orientation of the North Stradbroke Island economy, community and environment from sand mining to ecotourism.**

The State understands that, as a Contracting Party, the Australian Government can elect to invoke its sovereign right under Article 2.5 of the Ramsar Convention to restrict the boundary of a wetland included in the 'List of Wetlands of International Importance' if such a restriction is considered by that Party to be in the "urgent national interest". **We suggest that it is in the urgent national interest to successfully revitalise Toondah Harbour in the next few years in an environmentally sensitive manner to ensure that North Stradbroke Island transitions into a resilient ecotourism-based future community within a sensitive marine environment.**

In Australia, impacts on Ramsar listed sites have primarily related to changes to the ecological character of the site, notably in the Murray/Darling system. However, overseas examples of urgent national interest requiring changes to a Ramsar site boundary include highway development in Norway, thermal energy supplies in Iceland and flood prevention works in the United Kingdom.

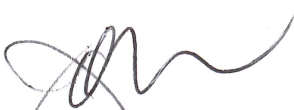
I acknowledge that Article 4.2 of the Convention states that "Where a Contracting Party in its urgent national interest deletes or restricts the boundaries of a wetland included in the List, it should as far as possible compensate for any loss of wetland resources". This may be for example, through the creation of new nature reserves for waterfowl in the same area, elsewhere, or an adequate portion of the original habitat.

**As the Ramsar Wetland manager, the State is best placed to work with your Department to consider potential boundary adjustments to the Moreton Bay Ramsar Wetlands to reflect the contemporary ecological values and economic requirements of the harbour area, and provide a broader net gain in Ramsar protection through both additional areas and the elimination of sand mining.**

A preliminary review of sites within or adjoining the Moreton Bay Marine Park that are currently excluded from the Ramsar Wetlands has identified several large sites that may well meet Ramsar requirements and could be made available to provide a net gain for the Moreton Bay Ramsar site in both size and quality.

Clearly, there is much work to be done by both the State and Australian Governments to jointly investigate this more fully. In the State's view, this can best be achieved through a Controlled Action determination by your Minister that will allow this important project to proceed to the EIS stage. This will enable the issues of impacts and offsets to be better understood and assessed in a considered, scientific and evidence-based manner and in accordance with the Bilateral Agreement that exists between us for the assessment of such projects on their merits.

Yours sincerely



Jim Reeves  
**Director-General**