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Via email: [epbc.nominations@environment.gov.au](mailto:epbc.nominations@environment.gov.au)

To Whom It May Concern:

**Lowland Tropical Rainforest of the Wet Tropics Bioregion - Submission to the Threatened Species Scientific Committee regarding assessment and advice to the Minister for the Environment**

Douglas Shire Sustainability Group Inc. (DSSG) is an incorporated association active in the Douglas Shire since 2005, in support of sustainability in this region.

The objectives of DSSG are:

- To promote the preservation and conservation of the unique environment with the Douglas Shire and its surrounds.
- To promote the preservation and conservation of the Great Barrier Reef Marine Park.
- To promote and encourage the adoption of the principles of ecologically sustainable development to all sectors of the community throughout the Douglas Shire.
- To promote the education and environmental awareness of visitors and residents of the Douglas Shire in support of environmentally sustainable practices.
- To recognise and promote the sustainable practices of the Traditional Owners of the Douglas Shire.

Our membership comprises individuals who are committed to protecting the unique environment in which we live, and in supporting sustainable development of the region. DSSG is also a member of Queensland Conservation Council and Cairns and Far North Environment Centre.

We attach comments on *Draft Conservation Advice for the Lowland tropical rainforest of the Wet Tropics Bioregion*. DSSG believes the Daintree Coast should be urgently listed as critically endangered.

Yours faithfully

Didge McDonald  
President

**Question: Do you agree with the information in the table on the following pages? In particular - are any of the listed threats more, or less, severe or of different timing or scope than currently proposed for this ecological community? Are any threats missing, and if so please specify? Please provide additional examples of threat impacts, including potential threats.**

This submission focusses on the Daintree lowlands and coast between the Daintree and Bloomfield Rivers. DSSG considers this to be the largest remaining area of lowland rainforest, the most significant centre of endemism sitting outside the WHA and, along with the Mission Beach area, the most threatened and the only place with relatively intact connection from mountain tops to ocean

DSSG agrees with the listed threats but adds

1. new threats involving major government funded infrastructure projects have emerged since the nomination, specifically:
  - a. replacing the Daintree Ferry with a bridge and
  - b. Reticulated power
2. Conservation controls, for example clearing for house sites and domestic pets, are not enforced
3. Incremental and ongoing upgrades to the Bloomfield track

1. (a) On the first point the Douglas Shire Council put on hold the ferry contract, due to come into service on July this year, at the first meeting of the new council in April last year, so it could explore options to build a bridge. We regard a bridge as a threatening process as it will inevitably lead to additional traffic (it will be a short route to Cooktown) and pressures to upgrade. The local and regional planning schemes both argue to retain the ferry as an attraction, a gateway and a traffic limiting measure. Significant road upgrades that would inevitable follow a bridge will require extensive earthworks, clearing and possible re-routing of the Bloomfield track. With the long term future of the ferry service in limbo, and strong advocates for it such as Cook Shire Council and the local member, Warren Entsch, the construction of a bridge remains a distinct opportunity

Prof Steve Turton had the following to say about the threats posed by a bridge:

***The bridge to World Heritage oblivion?***

*Dr Steve Turton (Adjunct Professor, Central Queensland University)*

*The largest area of tropical rainforest in Australia – the so-called Wet Tropics – is a narrow strip along the northeast coast of the continent, totalling about 2 million hectares.*

*It represents just 0.26% of the continent, but is crammed with hugely diverse landscapes: rainforests, sclerophyll forests, mangrove forests and shrublands, as well as areas of intensive agriculture and expanding urban rural population centres.*

The Wet Tropics are home to a dizzying array of plants and animals. These include at least 663 vertebrate species, 230 butterflies, 135 different dung beetles and a remarkable 222 types of land snail. The area is teeming with more than 4,000 plant species, including 16 of the world's 28 lineages of primitive flowering plant families.

In all, the Wet Tropics bioregion contains 185 distinct ecosystems. Of these, 18 are officially listed as endangered and 134 are of conservation concern.

Just under half of the region is covered by the Wet Tropics of Queensland World Heritage Area, the world's second-most-irreplaceable natural world heritage area. A recent analysis listed it as the planet's sixth-most-irreplaceable protected area in terms of species conservation, and its eighth-most-irreplaceable when considering only threatened species.

The rainforests in the Daintree Lowlands between Cape Kimberly in the south and Cape Tribulation in the north are undoubtedly the 'jewel in the crown' of the Wet Tropics.

These ancient rainforests are globally significant as they represent the largest remaining area of lowland rainforest in Australia's Wet Tropics, with an area sufficiently large to ensure ongoing evolutionary and ecological processes - an essential requirement for listing as World Heritage by UNESCO. In other parts of the Wet Tropics lowland rainforest was cleared for agriculture and urban development, with only small remnants remaining today.

The Daintree National Park and most adjacent 'undeveloped' blocks of freehold land contain extraordinary plant biodiversity, with many endemic species. These extremely rare plants are often referred to as 'green dinosaurs' because of their archaic characteristics.

Yet despite its global conservation significance, the Wet Tropics was recently described by the International Union for the Conservation of Nature (IUCN) as a World Heritage Area of "significant concern".

This is due to the threat posed to the area's biodiversity and endemic plants and animals by invasive species, diseases and predicted climate change impacts. Only two other Australian world heritage properties are listed as "of concern": the Great Barrier Reef and Kakadu National Park.

If a bridge is built across the Daintree River it is certain that more vehicular traffic will occur into the Daintree lowlands, with 24-hour access throughout the year. Research shows that bridges, road construction and road upgrades always result in adverse impacts in tropical forests around the world. For example, we know that bridges and roads act as conduits for invasive plants and animals to penetrate into intact forest areas.

The current Yellow Crazy Ant invasion into rainforests near Cairns is an ecological disaster that could easily be repeated in the Daintree. Judging by the ants' impacts elsewhere, this is an impending natural catastrophe.

These [impacts](#) could be direct – through predation and harassment – or indirect, such as by the removal of invertebrate prey or disruption of processes such as decomposition, pollination and seed dispersal. The potential for knock-on effects in a system as complex and interconnected as the Daintree rainforest is very high.

Building a bridge will bring inevitable pressures for road upgrades, residential and tourism development and will increase road kills of native wildlife, including loss of endangered species like the Southern Cassowary – an important keystone species.

Roads also create a [plethora of edge effects](#) that can extend up to 100 m or more into adjacent rainforest. Opening of the canopy provides ideal conditions for invasive weeds and animals, and wider rainforest roads have been shown to be a barrier to the [movement of some native animals](#).

All of these adverse impacts will result in a decline of presentation values admired by all tourists who visit the Daintree. Such threatening processes will undermine the [outstanding universal value](#) of the world heritage area – natural values that have remained remarkably stable for 10s of millions of years could be easily lost forever.

If outstanding universal value of world heritage attributes cannot be maintained due to threatening processes, then the World Heritage Committee of UNESCO has the right to list world heritage properties on the [World Heritage in-Danger list](#).

It's also worth pointing out that the Wet Tropics are a goldmine and the Daintree rainforest is a globally recognised icon. In its [2014-15 report](#), the Wet Tropics Management Authority calculated that this natural global asset is worth a whopping A\$5.2 billion each year – roughly half of it from tourism.

A [2008 report](#) found that the Wet Tropics create the greatest economic benefit of any of Australia's natural world heritage properties, excluding the Great Barrier Reef. It found that every dollar spent on management costs earned an A\$85 return in tourism spending. Even in purely economic terms that makes a pretty compelling case for conservation.

A bridge over the Daintree River will be the beginning of 'death by a thousand cuts' for the Daintree rainforest, and a catalyst for UNESCO to place the entire Wet Tropics of Queensland on the in-Danger List.

The environmental and economic impacts of such an unnecessary project are not worth gambling with in the new COVID-19 world!

1. (b) Reticulated power

The federal budget included \$19.3 m to begin reticulating power to the Daintree Coast. We note the Queensland Government response to this, (the Daintree Electricity Supply Study - a multi-criteria assessment of different electricity supply options for the Daintree by the Department of Natural Resources, Mines and Energy, 12 September 2019) recommended against this option and instead advocated upgrading existing stand alone systems as being low environmental/cultural heritage risk, more reliable and much cheaper. DFSSG believes this is in fact the also the preferred option of most residents. No customer survey has been undertaken

The study says the risk of a grid system (mislabelled microgrid) to natural and cultural heritage is medium to high, that extensive studies will be needed as installation would have an impact on “Matters National Environmental Significance”

Risk analysis table is as follows

## Risk Assessment

Each risk has been assessed against each option and assigned a risk rating. Naturally, if options are further progressed in the future, the risks identified will require further evaluation to determine whether they pose a substantial threat to the viability of the option and whether their impacts can be mitigated or limited to an acceptable level.

**Table 8-2: Assessed Risks R1**

RISK	R2	C1-3	I1	I2	I3	
	MICROGRID OPTIONS			INDIVIDUAL OPTIONS		
<b>Natural and Cultural Heritage</b> – <i>A higher rating indicates the option poses a greater risk to the natural and cultural heritage values of the region</i>						
Construction – Natural Heritage	Medium	Medium	Medium	Low	Low	Low
Construction – Cultural Heritage	Low-Medium	Low-Medium	Low-Medium	Low	Low	Low
Development – Natural Heritage	Medium - High	Medium - High	Medium - High	Low	Low	Low
Development – Cultural Heritage	Low - Medium	Low - Medium	Low - Medium	Low	Low	Low

<b>Overall rating<sup>14</sup></b>	<b>Medium - High</b>	<b>Medium - High</b>	<b>Medium - High</b>	<b>Low</b>	<b>Low</b>	<b>Low</b>
<b>Financial</b> – a higher rating indicates the option poses a greater financial risk to consumers						
Cost Certainty	<b>Medium - High</b>	<b>High</b>	<b>Medium</b>	<b>Medium</b>	<b>Low - Medium</b>	<b>Medium - High</b>
<b>Reliability and Security of Supply</b> – a higher rating indicates the option has a lower reliability and security of supply						
Reliability	Low - Medium	Low - Medium	Low - Medium	Medium	Medium	Low - Medium
Security	Low - Medium	Low - Medium	Low - Medium	Medium	Medium	High
<b>Overall rating</b>	<b>Low - Medium</b>	<b>Low - Medium</b>	<b>Low - Medium</b>	<b>Medium</b>	<b>Medium</b>	<b>Medium</b>

2. DSSG recommends all development that requires clearing, be the subject of EPBC review. Ongoing settlement, urbanisation and associated development pressures are considered the greatest threats. As above these threats are exacerbated by government funded infrastructure such as a bridge across the Daintree Rv, major and incremental road upgrades and services like grid power. The council does not enforce planning controls and local laws that, for example, limits to dog ownership. Uncontrolled domestic dogs and itinerant pig hunters using dogs are the greatest current threat to the local cassowary population
3. There are incremental upgrades to the Bloomfield track that make it increasingly serviceable as a short route to Cooktown. While it remains policy that the Bloomfield Track remains a “track” the incremental upgrades will ultimately lead to it being a major thoroughfare and itself will overtax the ferry capacity and increase pressures for a bridge

In summary DSSG believes the Daintree Coast should be listed as critically endangered, given the additional threats and that the entire area needs a conservation management plan that

1. guides government investment, reviews existing local, state and commonwealth controls and advises on a compliance mechanism

2. recommends a weed and pest control strategy
3. support for ongoing voluntary purchase of land, particularly in the “conservation zones” identified in the local planning scheme
4. regularly monitors and reports on overall cover and condition