

## Background

- Every year Townsville hosts a round of the Offshore Superboats Championship.
- The race is held within the Cleveland Bay Dugong Sanctuary
- The area is a sensitive seagrass habitat and home to threatened sea turtles, dugongs and snubfin dolphins
- The aim of this submission is to trigger an investigation under the EPBC Act that will result in effective environmental management of the race.
- [Click here](#) to read the Powerboat Race proposal.

## How to submit:

- Your submission must refer to matters covered by the Environment Protection and Biodiversity Conservation Act (EPBC).
- Simply stating that you don't like the Powerboat race will not be enough to trigger an investigation.
- Read the text below and if you agree make your submission by 04 June 2010.
- To make a submission simply cut and paste the text below and email as follows:
  - **TO:** [epbc.referrals@environment.gov.au](mailto:epbc.referrals@environment.gov.au)
  - **Subject:** Comment on Referral 2010/5504 – Townsville Powerboat Race
  - **Remember to add your name at the end of the text.**
- Please make sure you include the full Referral number and title in the body of your email (text below in bold).

**SUBMISSION TEXT** *cut and paste into the body of your email*

**Referral 2010/5504 Australian Power Boat Association Offshore Council/Tourism and recreation/Cleveland Bay, Townsville/QLD/Offshore powerboat race between Virago Shoal and Townsville Marina.**

The proposed activity requires thorough assessment under environmental law due to its potential for significant negative impact on marine species listed as protected under the EPBC Act and recognised as integral to World Heritage values.

There is also potential for negative impact on seagrass beds that are known to exist within and adjacent to the area of proposed activity. Seagrass beds provide vital resources for listed species, especially dugongs and green turtles. Therefore these species would suffer long term negative impacts if the proposed activity causes damage to seagrass beds.

Most importantly, dugongs, marine turtles and dolphins are known to use the area proposed for this boat race. All these species are known to suffer death and injury from boat strike. Their vulnerability to boat strike is clearly acknowledged in Federal and State government publications:

- Dept of the Environment, Water, Heritage and the Arts  
[www.environment.gov.au/coasts/species/dugongs/index.html](http://www.environment.gov.au/coasts/species/dugongs/index.html)
- Recovery plan for marine turtles in Australia (2003)  
<http://www.environment.gov.au/coasts/publications/turtle-recovery/pubs/marine-turtles.pdf>
- Marine wildlife stranding and mortality database annual reports by Queensland Department of Environment and Resource Management (previously Qld EPA)  
[http://www.derm.qld.gov.au/services\\_resources/item\\_list.php?series\\_id=205581](http://www.derm.qld.gov.au/services_resources/item_list.php?series_id=205581)
- And in the scientific literature referenced by these publications.

The known risk of boat strike for these listed species occurs during normal boat traffic. Much higher risk of boat strike must be expected during the proposed activity because the activity involves racing boats operating at vastly higher speeds than vessels that normally travel in this area, and because it involves higher density of large fast vessels than normal boating activity in this area.

In addition to dugongs, turtles and dolphins being present in the area all year, migrating humpback

whales use Cleveland Bay during the time of the proposed activity and they could also suffer boat strike and other negative impacts from the race.

Regrettably there is also potential for collision between boats, a risk heightened by vessels racing at extreme speeds. Any collision would likely result in spilled fuel and debris that would impact on listed species and seagrass and corals in and adjacent to the area proposed for the activity.

Due to dispersal by winds and currents the results of any substantial spill could damage a much larger area, potentially including extensive seagrass beds, many coral reefs and RAMSAR listed wetlands of Bowling Green Bay National Park.

The proposal appears to be inaccurate, misleading and incomplete in the following respects:

**Proposal Item 1.2:** It appears that (a) the geographic coordinates given at this item differ from positions given on the map provided with the application. Furthermore (b) in both cases the (different) geographic coordinates are not “boundaries” of the activity, although boundaries were required on the application. Instead the coordinates refer to marker buoys. Race boats clearly would not remain within the buoys but would travel past and around these buoys, resulting in the activity actually lacking any defined boundaries.

**Proposal Item 1.14:** The answer “No” at this item appears inappropriate because the area of proposed activity appears to partially overlap with a ‘Yellow Zone’ of the Great Barrier Reef Marine Park. Even if the western-most buoy(s) were to be placed just outside to the boundary of that Zone, both race boats and other boats associated with the race would likely travel in GBR Marine Park waters during the proposed activity. In addition the listed species at risk of boat strike (noted above) are inhabitants of the GBR Marine Park and travel freely across 'boundaries' marked on maps.

**Proposal Item 2.5:** In view of the known importance of sea country to Indigenous Australians and in particular the importance to them of turtles and dugongs, it appears inaccurate for the applicant to state that consultation with Indigenous Stakeholders is ‘Not applicable’. For example see: [www.environment.gov.au/coasts/species/turtles/culture.html](http://www.environment.gov.au/coasts/species/turtles/culture.html), [www.environment.gov.au/coasts/publications/pubs/turtle-harvest-national-approach.pdf](http://www.environment.gov.au/coasts/publications/pubs/turtle-harvest-national-approach.pdf)

**Item 3.1(a) and 3.1(h):** Negative answers are erroneous because the event would inevitably be surrounded by GBR Marine Park waters, species, corals, seagrass beds. Furthermore it is highly likely race boats and associated craft would operate within the GBR Marine Park at times during the proposed activity. The GBR Marine Park and its World Heritage values, including the listed species mentioned above would unavoidably be impacted if any of these animals suffers boat strike or if a fuel spill occurs.

**Item 3.1(b):** Negative answer is misleading because GBR is included in the National Heritage List.

**Item 3.1(c):** Omission of RAMSAR listed Wetlands at Cape Bowling Green National Park should be noted. Risk to these wetlands might be considered small due to distance, but nevertheless important due to sensitivity of wetlands species in the event of an uncontrolled drifting fuel spill.

**Items 3.1(d) and 3.3(g):** These Items refer to an attached Environment Report, but that report was not provided on the Referrals web page. Mitigation mentioned here cannot be considered effective, please see Item 4 below.

**Item 3.1 (f):** The listed species at risk of boat strike within the race area should also be considered species of Commonwealth Marine Areas due to mobility and migratory behaviour of these animals.

**Item 3.3 (h):** This is misleading because it fails to acknowledge the large difference in speed between ‘high speed’ of normal traffic and the extreme speed of the race boats. The statement that normal traffic “co-exists with the environment successfully” is misleading because negative impacts of vessel traffic in this area are well known. The Townsville Port area has been identified as an area of frequent boat strike in Marine Wildlife Stranding and Mortality Database Annual Reports by Queensland Department of Environment and Resource Management (previously Qld EPA). The potential

occurrence of additional boat strikes during a high speed boat race would inevitably exacerbate a known threat to listed species.

[http://www.derm.qld.gov.au/services\\_resources/item\\_list.php?series\\_id=205581](http://www.derm.qld.gov.au/services_resources/item_list.php?series_id=205581)

**Item 4:**

The proposed mitigation measures cannot be expected to have any practical mitigation effect. The known problem of boat strike occurs at normal boat speeds because (a) these marine species cannot reliably detect and evade oncoming boats at normal speeds and (b) even the most attentive boat crews cannot see these cryptic animals in time to avoid them reliably.

Given that race boats are expected to travel at extreme speeds it is entirely erroneous and grossly misleading to propose that race boat operators or support personnel on surveillance boats and helicopters could detect and avoid animals when that is repeatedly proven impossible during normal boat traffic.

During the proposed event, personnel on proposed surveillance boats and helicopters would quite properly be expected to direct their attention primarily to human safety and only sporadic attention might, at best, be allocated for wildlife.

Even if numerous additional observers were provided, with their only duty designated as watching for wildlife, there could be no expectation that observers could reliably detect species of concern. The turbid water of the proposed race area prevents observation of submerged animals and all the species of concern have infrequent and very cryptic surface behaviour.

Finally, in the event that a dedicated observer were to spot an animal in or close to the path of a race boat, the observer could not realistically be expected to convey information to a race boat driver quickly enough for evasive action, nor could a driver travelling at extreme speed take any sudden evasive action.

For these reasons I request that an investigation be made of the proposed action listed as **Referral 2010/5504**.

Please inform me of the outcome of this proposal.

Yours sincerely