

Summary of the second round of public consultation on proposed changes to the permission system

(Conducted September to November 2016)

Improving the Great Barrier Reef Marine Park permission system

February 2017

Contents Figure 1 – number of people who participated in public consultation (by method)4 Risk-based approach to assessments 9 Use of drones 14

Introduction

About the consultation

Between 5 September 2016 and 18 November 2016, the Great Barrier Reef Marine Park Authority (the agency) undertook a second round of public consultation on proposed changes to the permission system.

The permission system refers to legislation, policies, guidelines and procedures used by the agency to manage activities within the Marine Park requiring permission, accreditation or notification. More <u>information about the permission system</u> can be found on our website.

The focus of this second round of consultation was to gather feedback on proposed changes to policies and guidelines that guide decision making in relation to the permission system.

A previous round of consultation was conducted in 2015, focusing on proposed legislative amendments. Details of the first round of consultation are available in the Response to public consultation on proposed changes.

This second round of consultation aimed to seek public and stakeholder feedback on an updated <u>Permission System Policy</u> an updated <u>Risk Assessment Procedure</u> and a number of newly created application and assessment guidelines and information sheets.

These documents explain how the agency interprets the *Great Barrier Reef Marine Park Regulations 1983* (the Regulations) to process applications and assess risks and impacts of proposed activities on values of the Marine Park.

These documents also explain how the agency works in partnership with other government agencies such as Queensland Parks and Wildlife Service and the Australian Department of the Environment and Energy (the Department) when proposed activities occur within multiple jurisdictions.

During this round of consultation, the project team directly contacted and invited feedback from:

- all current permission holders and recent applicants
- relevant government agencies
- researchers with an interest in the Great Barrier Reef
- industry peak bodies
- national and community conservation groups
- the agency's Local Marine Advisory Committees
- the agency's Tourism Reef Advisory Committee
- the agency's Indigenous Reef Advisory Committee.

The public consultation period was advertised on the agency's website, and other networks were notified to encourage feedback through their own websites or newsletters. Public information sessions were hosted in Cairns, Airlie Beach, Townsville and Brisbane including some industry specific sessions.

People were encouraged to provide comments and feedback by:

completing a short online survey

- sending a letter or email submission
- attending an information session.

This document provides a summary of supporting comments and issues raised within the feedback, but does not provide a specific agency response. Clarification notes have been provided where factual matters could be easily addressed.

Overall response

In total, 82 people or groups participated in this round of consultation. This represents a decrease of 55 respondents (down 40 per cent) when compared to the first round of consultation conducted in 2015.

Feedback was received through the online survey, by email, telephone and verbally at information sessions. Figure 1 presents a breakdown of participation in the public consultation:

- Twenty-three respondents completed the online survey by rating the usefulness of a document; eight of these also provided comments in the free text section. Of these, one person was from an industry group and one was from an advisory group.
- One person provided feedback by telephone.
- Twelve people attended public information sessions, with an additional 27 people attending research-specific sessions. Not all of those who attended provided feedback.
- Nineteen people sent an email submission.

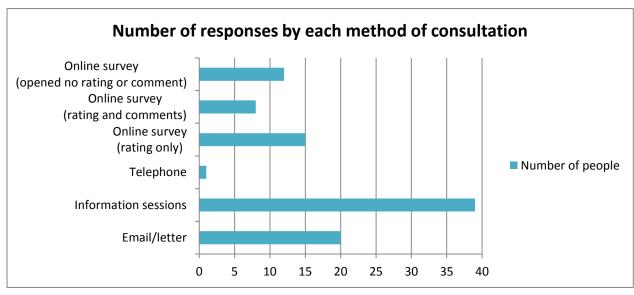


Figure 1 – number of people who participated in public consultation (by method)

Feedback results

This section provides details of how responses were received.

Online survey

The survey allowed respondents to provide general feedback or link their feedback to a specific documentusing free text comments or rating the usefulness of document.

Of the 23 people who completed or partially completed the survey, a majority found the suite of documents to be useful or somewhat useful, as illustrated in Figure 2.

A total of eight respondents provided feedback on specific documents through the free text function in the online survey:

- Guidelines Application for permissions (3)
- Activity Guidelines for whale watching (2)
- Activity Guidelines Photography, filming, sound recording location specific assessment guidelines (1)
- Social impact assessment guidelines (1)
- Managing facilities in the Marine Park (1)
- Indigenous heritage impact assessment guidelines (1).

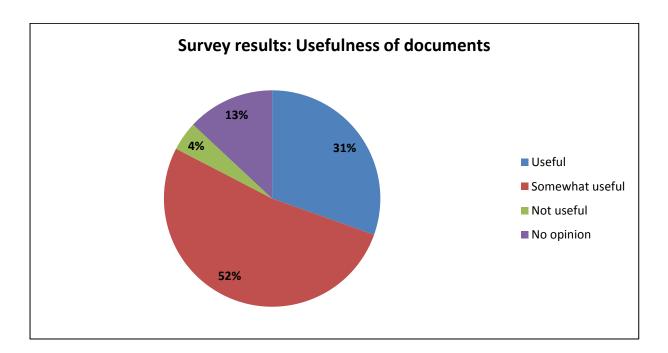


Figure 2 – How survey respondents rated the usefulness of documents (where n=23)

Telephone

A number of telephone calls were received during the consultation period seeking further clarification, information or for general discussion about the project. One Traditional Owner provided feedback over the phone.

Information sessions

Public information sessions were held in Cairns, Townsville, Airlie Beach and Brisbane. Two additional sessions were offered subject to interest, one on the Capricorn Coast and the other in Canberra. There was no significant interest for sessions in these locations, and they did not take place. A total of 12 people attended the general sessions, as follows:

- Cairns one person from local government
- Townsville three people in total (two from a conservation group and one tourism operator)
- Airlie Beach two tourism operators
- Brisbane six people in total (one consultant and five from State Government agencies).

Two separate research-focused sessions were held, attracting a total of 27 attendees. One was held at James Cook University with researchers from Townsville and Cairns; the other was held in Brisbane and was attended by researchers from several different institutions. Suggestions focused on improvements to the agency's <u>Policy on Managing Scientific Research in the Great Barrier Reef Marine Park</u> and clarifying requirements for research activities and equipment.

Advisory group input

The agency works closely with advisory committees who provide advice on operational issues and assist in the development of policy and strategic direction in management of the Marine Park. Advisory committees comprise a cross-section of Traditional Owner and stakeholder interests with expertise and experience in relevant areas.

Emails were sent to chairs and secretaries of the Indigenous Reef Advisory Committee, Tourism Reef Advisory Committee and 12 Local Marine Advisory Committees advising of the consultation launch and closing date extension.

The Tourism Reef Advisory Committee and the Whitsundays Local Marine Advisory Committee both provided feedback opposing the proposed increase in tourism permit terms (from six years to 10 years) for operators that are not High Standard Tourism Operators.

The Townsville Local Marine Advisory Committee raised concerns that any changes to the current processes under the *Environment Protection and Biodiversity Conservation Act* 1999 (EPBC Act) could reduce environmental protection, but agreed that any genuine duplication should be minimised. They expressed concerns that resourcing constraints were causing delays and encouraged a risk-based approach to assessments.

No formal comment was received from the Indigenous Reef Advisory Committee or other Local Marine Advisory Committees.

Written submissions - emails and letters

In addition to advisory group input, a total of 19 email submissions were received, some including detailed feedback submitted as a letter attachment. The following stakeholders provided written feedback:

tourism industry (7)

- resources/ports sector (3)
- conservation groups (3)
- Australian Government agency (1)
- State Government agency (1)
- Traditional Owner (1)
- other private individuals/companies (3).

These stakeholders have a range of varying interests which resulted in a diverse range of comments being submitted.

Summary of comments

Feedback on general principles

A number of comments were received supporting the proposed improvements and general direction of the improvements specifically in relation to:

- increasing accountability and transparency in the consideration of applications and assessments
- providing more certainty around timeframes and assessment criteria
- establishing a system that provides greater clarity of process.

Feedback on the process for consultation

Some respondents had difficulty navigating and identifying the link between documents and the overall aim of the agency's consultation, particularly in context of other agency documents and consultation activities. The suggestion was made that documents should be linked back to objectives of the *Great Barrier Reef Marine Park Act 1975* (GBRMP Act).

There were concerns the agency has taken a disjointed approach to reviewing policies and guidelines, specifically that improvements to the permission system are being undertaken separately to the Whitsundays Plan of Management review and other policies requiring review.

There were concerns that improvements to the permission system project did not reflect the agency's approach in developing policies about cumulative impacts, offsets and net benefits.

It was suggested that during implementation the agency should have a clear communication strategy to assist applicants to find relevant information, such as structuring the agency's website based on specific interest groups.

Permission processes and timeframes

Most respondents provided feedback around the current application, assessment and approval processes, including suggestions for potential improvements. A number of respondents supported proposed amendments to the Regulations.

Note: Proposed amendments to the Regulations were specifically consulted on during the first round of consultation in 2015. The amendments remain relevant to this project and are being progressed, but were not the focus of this second round of consultation.

There were concerns that the current system is slow and lacks transparency and certainty around assessment processes and timeframes; and that the proposed changes do not adequately address these shortfalls.

There were concerns that the agency is not adequately resourced to meet demand, leading to delays for applicants or permission holders.

Suggestions were made to improve the application process:

- Checklists should be provided to help applicants submit the correct information for efficient processing of applications.
- An online application system would help to streamline the application process.
- Information on matters of national environmental significance should be linked directly through an online application process so applicants are not required to search elsewhere to adequately respond.
- A mechanism should be included in an online application process to enable endorsement (by an authorised person who may not be the applicant) prior to submission of an application.
- A mechanism should be included allowing a person to confirm if their activity requires permission before starting the application process.
 - NOTE: The application guidelines encourage people to email the agency prior to submitting an application if they are unsure whether or not they require permission.
- A system of preliminary assessment and approvals would give applicants certainty around design and planning of infrastructure.
 - NOTE: As explained in the <u>Response to public consultation on proposed changes</u>, the agency is not considering introducing preliminary approvals in phase one of this project, but will explore this concept further in phase two.
- Legislative timeframes should be introduced to provide applicants with certainty around processing timeframes, including the ability to 'stop the clock' when further information is requested.
 - NOTE: As explained in the <u>Response to public consultation on proposed changes</u> the agency is not considering introducing statutory timeframes in phase one of this project, but will explore the merits of introducing statutory timeframes in phase two.
- It would be helpful if Part 5 of the Zoning Plan was appended to the policy allowing applicants to easily determine activities that can be conducted in the Marine Park without permission, following notification.

Interactions with the EPBC Act

An <u>Information Sheet on Deemed Applications</u> was made available for feedback. It described the joint assessment process (under a Memorandum of Understanding) between the agency and the Department when proposals require assessment under the EPBC Act and GBRMP Act. The following comments were received:

Positive feedback that the document clarified existing processes.

- One respondent supported a 'one-stop-shop' system where a decision under the EPBC Act would not be required for activities wholly within the Marine Park. This respondent also noted that duplication should be minimised in the processes where possible.
- Two submissions advocated removing the requirement for the agency to grant permission, where projects are assessed under the EPBC Act or the *Environment Protection (Sea Dumping) Act 1981*.
- Two respondents had concerns that not requiring EPBC Act approval for activities within the Marine Park could reduce environmental protection.

NOTE: As explained in the <u>Response to public consultation on proposed changes</u>, the agency is not proposing to remove the need for EPBC Act approval in phase one of the project, but will continue discussing the appropriate timing with the Department.

Risk-based approach to assessments

The <u>Risk assessment procedure</u> for the permission system was updated to improve consistency in the way impacts are considered during assessment of applications.

- There was support for a consistent, risk-based approach to assessments, provided there is focus on actual identified impacts based on scientific information.
- One respondent suggested that the agency implement outcome-based conditions.
- Comments indicated the procedure takes a reasonable approach to risk evaluation but needs refining, in particular:
 - Review the sensitivity and exposure approach to account for when sensitivities are well understood (from previous monitoring of the same activity) and impacts are considered acceptable. The respondent noted the procedure appears to indicate a risk assessment would be required each time a routine activity is undertaken, although it is known to have negligible/minor impacts to a value that may occasionally be present in the area.
 - Review the list of potential hazards to ensure it reflects the most likely hazards and risks based on real-life scenarios.
 - The consequence table requires considerable refinement including the provision of examples in the more severe categories to help determine consequence scales.
- A suggestion was made that the procedure should identify that impacts on values must be considered within the regional context of the condition and trend of those values (such as is the Strategic Assessment), not at a project site level.
- There was concern that the risk assessment procedure does not adequately consider cumulative and consequential impacts.
- A suggestion was made to include reactive monitoring linked to triggers for stopping activities if impacts occur.
- It was also suggested that when using experts to assess risk and impacts, both the agency and the applicant should have a say on the experts used.

Native Title and Traditional Owner interests

Traditional Owners have inherent rights and interests over their land and sea country. The agency acknowledges the Traditional Owners of the Great Barrier Reef and their continuing associations with the Great Barrier Reef.

<u>Indigenous heritage value assessment guidelines</u> were released for public comment and all documents released included consideration of Traditional Owner matters. One Traditional Owner provided the following feedback in relation to consideration of Traditional Owner matters in the permission system:

- The Native Title Notification process for applications is not effective for two reasons: the information is sent to the Land Councils and does not get passed onto Traditional Owners; and the agency does not consider the comments when making a decision.
 - NOTE: The agency is required to consider comments when making a decision.
- Traditional Owners should not have to pay for permits to undertake their traditional activities.
 - NOTE: Fees are not charged for applications to conduct traditional activities.
- Traditional Owners should be identified within the 'target audience' for the policy and other documents.

The respondent also provided suggestions around improving meaningful partnerships between the agency and Traditional Owners, including:

- development of a Memorandum of Understanding to involve Traditional Owners in a stronger capacity, such as paid consultancies and participation in research activities.
- mandatory Traditional Owner consultation, with an appropriate fee to be chargeable, in the process for public notification for permission assessments. This suggestion also noted that any activities likely to impact cultural heritage should be considered by Traditional Use of Marine Resource Agreement committees.
- financial compensation to Traditional Owners for use of their sea country which could then be used for joint management of the Marine Park. This was noted as a way of ensuring equitable distribution of community benefits.

Research

Due to a high level of interest from the research community, targeted information sessions were held for researchers.

There was general endorsement for the accreditation of educational and research institutions based on environmental standards and practices, so that certain activities do not require permission.

The following suggestions were made in relation to research permissions:

 Clear guidance is needed around what is considered research, as compared to education and tourism (edu-tourism and volun-tourism) including under accreditation.

- More guidance is needed in relation to photography, filming and sound recording guidelines, specifically relating to the use of drones.
- More guidance is needed for research permit holders around the use of samples following collection, particularly where a sample is collected in the Marine Park, but then procured by another researcher outside the Marine Park.
- Researchers should have more flexibility to modify their permission to include new sites of equivalent nature and zoning status to those already permitted, without the need to seek a new permit.
- More guidance is needed around the types of research equipment and methods that may be used under accreditation.

Tourism

The tourism industry accounts for the largest volume of permitted use of the Marine Park. In general there was support for the improvements, support for the levels of assessment and support for a low risk routine tourism permit with the suggestion that it could be self-assessable.

Comments included:

- Concerns from tourism industry bodies about increasing the general tourism permit
 term from six to 10 years, but support for increasing High Standard Tourism
 Operator permit terms from 15 to 20 years. The main concern was that lengthening
 the term of the general permit would not increase the incentive to become High
 Standard Tourism Operators. Tourism industry bodies were concerned this would
 result in less interest in the High Standard Tourism Operator program, which would
 conflict with the Australian and Queensland Governments' collaborative approach
 to protecting the Reef.
- A suggestion was made the agency should grant cetacean exemptions to High Standard Tourism Operators allowing a closer experience with whales.
- One respondent thought that low-level flights (under 1500 feet) should not be allowed under the new low risk tourism permit as they would cause impacts from noise and fumes on the ecological and social values in the Hinchinbrook Planning Area.
 - NOTE: The Plan of Management requirements are not being changed as part of this project, and any permission granted by the agency must comply with Plan of Management requirements.
- A suggestion was made that any superyacht visiting the Marine Park should be required to have a licenced pilot on-board who could also carry out specialty activities to minimise risk to the Marine Park.
- One respondent suggested that tourism permits should be rationalised so similar permits have the same terms and conditions, with any special conditions being clearly identified.

Fixed Facilities

A <u>discussion paper</u> and <u>Activity assessment guidelines for managing fixed facilities</u> in the Marine Park were made available for comment. The discussion paper was prepared by an

external contractor to give options for possible inspection schedules for different types of facilities.

- There was support for longer term permits for facilities associated with ports, dredging and energy, with up to 25 years being ideal.
- There was support for a risk-based approach to determine whether a facility should be decommissioned and left in place or decommissioned and removed at the end of its life.
- It was suggested there are some jurisdictional overlaps relating to the management of pontoons that have not clearly been identified.
- One comment suggested that when the agency is considering diving safety for the purpose of conducting facility inspections, safety should be defined in consultation with the Australian Maritime Safety Authority rather than Workplace Health and Safety Queensland (as suggested in the discussion paper), as the latter would add an extra layer of red tape.
- In terms of inspections and maintenance, no issues were raised around implementing an inspection regime with different levels depending on the specific type of facility and its risk. Specific suggestions included:
 - Barge/boat ramps Level 1 inspections should be carried out every one to two years, depending on age, with level 2 and 3 inspections only being carried out if issues were identified at the level 1 inspection.
 - Jetties Level 1 inspections should be carried out every one to two years, depending on age, with level 2 inspections every five years.
 - o Pontoons Level 3 inspections for pontoons should involve a complete structural inspection of hull plating and underwater infrastructure, including any rectification works. When the hull has been signed off by the surveyor then the design life clock should restart on the structure. If the pontoon has not been slipped by the 20th year, regardless of its condition, it should be removed and thoroughly inspected and repaired.
 - It is important to distinguish between a floating walkway or access pontoon and a permanently moored tourist pontoon when considering inspections and works.
- In terms of maintenance and works, the following comments were made:
 - The agency should be able to approve a schedule of works faster than the timeframe indicated in the guidelines.
 - For decommissioning and removal of piles, the agency should determine the appropriate depths for cutting off piles on a case-by-case basis relevant to the type of facility and location, rather than the one metre depth suggested.
 - Cleaning of marine growth from the hull of a pontoon can be problematic as it can damage opportunistic coral growth, lead to corrosion and reduce the life of the facility.
 - Ultrasonic thickness testing of facilities is a successful measure to determine where corrosion is taking place.

- An issue was raised that the discussion paper incorrectly identified typical diving activities for mooring inspections as high risk diving.
- It was suggested that bonds should be required for all works, and ongoing monitoring should occur for at least five years after works finish.
- One respondent suggested that any person undertaking mooring inspections and maintenance should have relevant professional qualifications as per criteria in the <u>Policy on Moorings in the Great Barrier Reef</u> and these should be outlined in the activity guidelines.
- The respondent also suggested that a person undertaking inspections and maintenance on low-risk private moorings should be approved by managing agencies as having demonstrated competencies in moorings maintenance.

NOTE: The <u>Policy on Moorings in the Great Barrier Reef</u> explains how the agency manages the installation, operation, inspection and maintenance of private buoy moorings. The <u>Activity assessment guideline for managing fixed facilities</u> does not address the management of moorings other than moorings associated with other types of facilities (such as tourist pontoons).

Environmental Management Plans

The <u>assessment guidelines</u> included a section on the use of Environmental Management Plans (EMPs).

- One respondent commented it was unreasonable to require 40 business days for the agency to review a final EMP when a draft EMP had already been provided at the time of application.
- One respondent supported the independent auditing of EMPs every five years.

Port Activities and Dredging

Some comments relating to dredging activities are summarised under the seagrass heading as they are also related to feedback on guidelines for assessing impacts to seagrasses.

The following additional comments were made:

- A more realistic and balanced approach to the consideration of impacts from ports and dredging is needed throughout the documents.
- The documents discuss potential impacts that may never eventuate due to certain industries already being heavily regulated.
- There was concern that a project-based determination of assessment process for dredging projects greater than 50,000 cubic metres is ambiguous and likely to result in inconsistencies.
- A suggestion was made that the documents should clearly identify that some ports pre-date the GBRMP Act, and that there are a range of day-to-day port activities taking place outside the Marine Park, within port limits.

Small engine emissions

One submission provided specific comments about new standards for small engine emissions and how these should apply in the Marine Park. This included:

- Concern that the revised assessment criteria did not include explicit consideration
 of emissions from small marine engines and that Australia is well behind other
 countries in the regulation of these emissions.
- Concern that the agency had not considered the Department's proposed emissions standard to be adopted in 2017 in any of the guidance material.
- The suggestion to impose conditions on any new permission requiring all small engines to comply with the latest standards. It was noted that the new national standards would only apply to newly built or imported engines, whereas a condition imposed by the agency could apply to all engines (new and existing).

NOTE: The Regulations do not list specific impacts that are to be considered, but more broadly require the agency to consider all potential impacts on the values of the Marine Park. Emissions can therefore be considered in the assessment of applications when applicable.

Use of drones

The use of drones is described in the <u>recording activity assessment guidelines</u>. One submitter provided comments relating to the use of drones in proximity to important seabird sites. This included:

- Concern that seabird nesting seasons have not been adequately addressed in the guidance material when assessing the impact of using drones for filming.
- A suggestion that the guidelines further explain how impacts on seabirds from drones will depend on bird size, colony size and level of habituation.
- A suggestion that the context of use of drones needs to be considered and that it
 may be appropriate to allow seabird surveys at 75 metres for research purposes
 but not for commercial filming, as this is likely to have a greater level of
 disturbance.

Seagrass impact assessment

One respondent was supportive of the <u>seagrass value assessment guidelines</u> suggesting they be updated with additional guidance from the Reef Integrated Monitoring and Reporting Program Design Expert Working Group.

Two respondents raised concerns around descriptions of dredging and dredge material disposal. These respondents commented that the descriptions are inaccurate and present a series of potential impacts not previously occurring and unlikely to occur in the Great Barrier Reef.

These respondents were also concerned that the seagrass guidelines, as currently written:

- are too prescriptive and do not provide a balanced view of risks to seagrass communities from other influences
- are biased toward what the potential impacts are to seagrasses, particularly from dredging, and the effectiveness of mitigation measures
- include impacts that are not based on real risk events
- do not include monitoring and compliance requirements

- include a definition of critical meadow which is too broad and does not really articulate what is considered critical
- include mitigation measures for facilities that appear to have no real consideration for real-life situations
- the two-year period for baseline data required for an assessment is just a blanket figure and should be reconsidered to be commensurate with the risk and value potentially affected.

The following suggestions were made:

- The use of water quality thresholds and sub-lethal tools to measure stress on seagrasses is supported, however the respondent suggested caution is needed in recommending the use of these strategies due to the experimental nature and lack of standardised methodology.
- The guidelines should include statements on the natural variability of seagrass communities and acknowledge the results of many years of monitoring seagrasses within the Great Barrier Reef World Heritage Area to provide a balanced view.
- The consequence table needs to be reconsidered as it does not reflect impacts that have occurred within the Marine Park, or activities likely to be conducted in the Marine Park.

Social impact assessment

<u>Social impact assessment guidelines</u> were made available for comment. These guidelines explain the importance of the different social values and how activities may impact these values.

- One submission expressed concern that the guideline is unclear and ambiguous as to when, in what format and who will conduct a formal social impact assessment.
- One respondent questioned whether the further guidance and standards that are being developed in addition to the social impact assessment guidelines would undergo consultation, and if so felt that this process would be duplicative and inefficient.

Note: No public consultation is planned for these further materials, as these reflect internationally recognised methods and will support and be used in conjunction with the guidelines.

Agency response to comments received

The agency will now consider all relevant comments received in preparing the final policy and guidelines. We recognise that improvements can be made to the policy and guidelines to better explain our expectations and approaches to managing the permission system.

We plan to finalise and publish these documents once regulation amendments are completed in 2017. Once finalised, we will send information to stakeholders and permission holders explaining the changes that will come into effect.

Our plan is for all of these changes to be implemented by the end of 2017; however, this timeline is dependent upon progressing legislative amendments.

Out of scope comments

Some participants used this public consultation process to comment on matters outside the scope of the Improving the Permission System project.

While these comments may be relevant to other aspects of managing activities in the Marine Park, they were not specifically relevant to the project or the documents released.

Out of scope comments have not been considered further by the project team but, where relevant, have been passed on to the appropriate area in the agency for consideration. Out of scope comments are identified in Table 1.

In addition, some people commented on documents which were not the subject of this round of consultation, such as materials from the first round of consultation or the current Environmental Impact Management Policy (rather than the draft revised version).

Table 1: Out of scope comments.

Comment topic	Why it is out of scope
Policy on managing tourism	The agency's policy on <u>Managing tourism permissions to</u>
permissions, including allocation,	operate in the Great Barrier Reef Marine Park (including
latency and tenure	<u>allocation, latency and tenure</u>) is not currently under review.
Environmental Management	The EMC legislation is not part of this review. The EMC
Charge (EMC)	applies once permits are granted and is outside the scope of
	this project.
Sustainable numbers and use in	The Whitsunday Plan of Management is currently under
the Whitsundays Planning Area	review in a separate project and is planned to undergo
	consultation in 2017.
Whitsundays Whale Protection	The Regulations governing Whale Protection Areas are not
Area	currently under review by the agency.
Aquaculture	A number of comments were received in relation to
	perceived proposals by the agency to change the definition
	or management of aquaculture within the Marine Park.
	There were no proposed changes to aquaculture as part of
	this consultation, or more generally within the agency.
Shipping	In general, shipping does not require permission and
	therefore is outside the scope of this project.
Comments specifically relating to	The research policy is being updated in tandem with
the Research Policy	improvements to the permission system, and targeted
	consultation will occur later in 2017.
Swimming with humpback whales	This would require an amendment to the Regulations
in the Whitsundays	beyond what is being considered in this project.

Documents available for consultation

The following documents were made available for public feedback. Some respondents provided general comments relating to principles covered in various documents, while others made specific comments on individual documents.

This list identifies whether the documents were the subject of specific feedback or not.

- <u>Permission system policy</u> comments are included in the various sections throughout the report.
- Joint Marine Parks permissions guidelines no specific comments received.
- <u>EPBC deemed applications guidelines</u> comments are included in the section Interactions with the EPBC Act.

- Application guidelines and <u>Checklist of application information</u> comments are included in the section <u>Permission processes and timeframes</u>.
- Risk assessment procedure comments are included in the section Risk-based approach to assessments.
- <u>Assessment guidelines</u> comments are included in the various sections throughout the report.
- <u>Historic heritage value assessment guidelines</u> specific comments were not received.
- <u>Indigenous heritage value assessment guidelines</u> specific comments were not received.
- <u>Social value assessment guidelines</u> comments are included in the section <u>Social</u> impact assessment.
- <u>Dugong value assessment guidelines</u> specific comments were not received.
- <u>Seagrass value assessment guidelines</u> comments are included in the sections <u>Seagrass impact assessment</u> and <u>Port Activities and Dredging</u>.
- <u>Recording activity assessment guidelines</u> comments are included in the section <u>Use of drones</u>.
- Whale based tourism activity assessment guidelines specific comments were not received.
- Location specific assessment guidelines specific comments were not received.
- <u>Maritime cultural heritage protection Special Management Area guidelines</u> specific comments were not received.
- <u>Managing facilities discussion paper</u> and <u>Facilities activity assessment guidelines</u> Comments are included in the section Fixed Facilities.

Conclusion

We wish to thank everyone who took the time to read the consultation documents, attend an information session, complete an online survey or make a submission.

Should you have any questions, you can reach us at:

Great Barrier Reef Marine Park Authority

Email: info@gbrmpa.gov.au
Telephone: (61) 07 4750 0700