



**Association of Marine Park Tourism Operators**  
**Administration**

**ABN 77 008 657 823**

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11 September 2002

Dr Neil Byron  
Commissioner  
Productivity Commission  
Locked Bag 2  
Collins Street East  
MELBOURNE VIC 8003

Dear Dr Byron,

**WATER QUALITIES ISSUES PAPER – AMPTO LTD SUBMISSION**

The following submission is made on behalf of the Association of Marine Tourism Operators which is vitally interested in the sustainability of the Great Barrier Reef Marine Park, and views the growing water quality issue as *the* major, and immediate threat to its survival.

AMPTO Ltd, formed in 1989, represents more than 200 marine tourism operations based mostly within the Great Barrier Reef Marine Park. Its members' operations include the transportation, accommodation, education and entertainment of visitors to the GBRMP. Ours is a minimal impact industry whose activities generate an estimated \$1.5B per annum for the regional Queensland economy.

Our members' provide almost the entire infrastructure for presentation of the GBR World Heritage Area, and have considerable capital invested in their allocated reef sites and operations. Although its development is on the GBRMPA's agenda, no contingency plan yet exists for marine tourism operators to move to alternate sites if their allocated area is severely degraded by weather, climatic events, or predation by starfish. In the past decade, the marine tourism industry has been subjected to increasing regulation and scrutiny by the GBR Marine Park Authority and the state government Environment Protection Agency. These organizations have adopted a "precautionary" approach when assessing potential environmental impacts from our industry.

This association is convinced of a clear linkage between an increased frequency in Crown of Thorns Starfish outbreaks and decreasing levels of water quality within the GBR basin. Scientific acceptance of this nexus is approaching, but, surprisingly, in the vital debate over this issue, none have yet called for adoption of the "precautionary" approach so commonly applied in our industry's case. Degradation of water quality has not happened overnight, the current situation is an insidious culmination of one hundred years development of the coastal zone and its river catchments. Clearly, the time for action is now. It would be a tragedy if your report were unwittingly to provide a basis for further procrastination over this vital issue.

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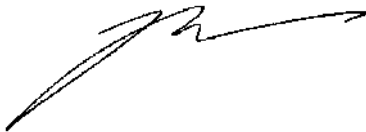
The issues paper points to the difficulty in providing common bases for comparison of the economic contribution of industries within the GBR lagoon and its catchments. This difficulty is acknowledged. Similar problems exist in the matching of water quality sampling data to various areas, catchments, and sources. However, the effects of runoff effluent are not restricted to the vicinity of its source but circulate widely through the reef basin. An holistic approach must be taken in addressing the problem. Runoff from sources in statistical areas which have low marine tourism activity can affect more distant areas which do. The magnitude of the task to redress the problem of declining water quality will take decades. Areas where there is little or no current tourist activity may be the tourist “Mecca” of the future. The state government has clearly marked tourism as the means to develop and reinvigorate much of regional Queensland. Potential development of additional marine tourism hubs along GBR littoral regions must not be jeopardized by short-sighted decisions.

The terms of reference for your report which, inter alia, call for a comparison of the economic and social importance of various industries promote the inference that resulting action will be taken on a cost benefit, piecemeal basis. If this inference is correct, such an approach is rejected. An approach to the water quality problem predicated on this basis will fail, delivering too little, too late. Fate may deliver the coup de grace to a chronic environmental situation within many valuable sections the GBR lagoon at any time, per medium of further bleaching episodes or cyclonic events.

The difficulties inherent in tackling the varied causes of contamination of runoff to the GBR lagoon are not underestimated by this association. We accept the need for staged outcomes in dealing with each factor affecting water quality. However, all identified factors must be addressed in the short term, by revising current planning and practices, and beginning redress of systemic contributing factors. Our industry has not been allowed any latitude in its operations where environmental sustainability is in question. It is not unreasonable to expect that other industries whose terrestrial activities threaten our livelihood should aspire, and expeditiously conform, to similar standards.

AMPTO will be pleased to provide further information about any facet of our submission upon request. Thank you for the opportunity to contribute to this vital debate.

Yours sincerely,



Bob Thomas  
Executive Director