Humpbacks & High-Rises PO Box 195 Griffith University Post Office, Gold Coast Qld. 4222

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Open submission in regards to Philip Park development proposal

Dear Sir/Madam

I am referring to the development proposal of an ocean-side cruise ship terminal at Main Beach, Gold Coast.

A document was prepared by AECOM Australia Pty Ltd containing an environmental assessment of the potential impacts of this development. Based on the drawings provided a 1,2km jetty and a retention wall (18m depth with a length of 780 m and up to 5 m height) is to be build offshore from Philip Park, Main Beach that involves between 12-18 month of piling. An estimated 150 cruise ships are expected each year and ongoing maintenance including dredging is expected. The port is to be operated for up to 50 years.

## Background

This region is subject to the highest entanglement rate of marine mammals in Queensland and the highest number of incidents with marine mammals (Meynecke & Meager, 2016)

The region is one of the few resting spots along the east coast of Australia for Humpback whale mother/calf pairs and records of calving (Meynecke et al. 2013). humpback whale are not only "likely" to pass, they are residing in the area between several hours or days (see attached map of survey tracks) and this occurs from June to November each year not only from September to November.

Impacts of climate change are likely to alter the behavior of whales and with it the significance of the region. Prediction on future impacts therefore need to include continues ocean warming and increased severe weather events (Meynecke & Richards, 2016)



Sightings of Antarctic Minke Whales, Australian humpback dolphin, killer whales are confirmed in close proximity to the development site (within 5 km range).

Concerns in regards to the environmental assessment report:

- the report is lacking technical details using outdated references, not applicable references or unverified information from the Internet. Relevant published information specific to the area is missing from the report
- the report fails to assess additional marine species that are utilising the area and are protected by law such as the scallop hammerhead
- there are missing dolphin and whale species that are using the area such as bottlenose dolphins and common dolphins
- failure to include current high density boat traffic and noise pollution in the assessment that are existing impacts on marine mammals
- mentioning species that are irrelevant for the area (Irrawaddy Dolphin) or not mentioning records of killer whale and Australian humpback dolphin sightings in close proximity to the construction site

Potential impacts and mitigation measures

- proposed retention wall will alter flow and block access to previously used habitat for humpback whales and dolphins
- piling, dredging and traffic will alter water quality, increase turbidity and noise. The impacts of such activities on whales and dolphins are well documented in scientific literature
- impacts of ongoing maintenance such as dredging

It is presumed that all vessels will comply to the standard guidelines and laws regardless of this operation. They are not a mitigation measure specific to this operation and are unlikely to be effective enough considering increased traffic and noise. Other proposed mitigation measure such as the monitoring of safety zones to identify approaching marine mammals and implementing operational procedures to minimise the risk of impacts, traffic controls, sensitive design principles and selective construction methods to minimise potential environmental impacts require a detailed knowledge of the species occurrence and behavior in the area which currently does not exist. Mitigation measures will need to ensure the safety and well being of the marine mammals in the area through monitoring and assessing avoidance behavior, boat strikes and near misses.

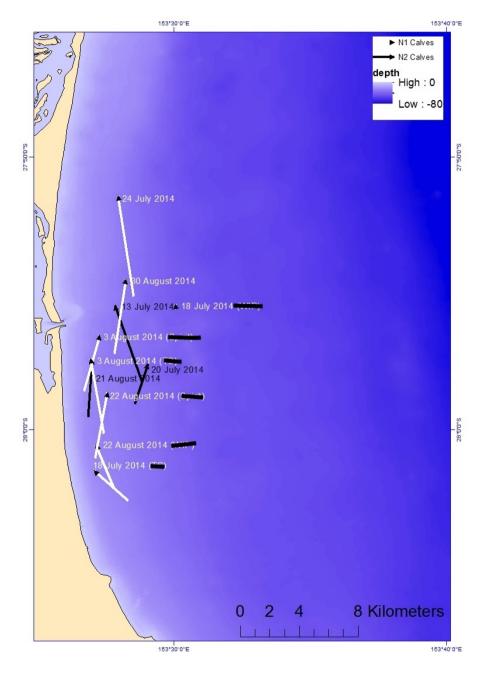
In conclusion the current development proposal does not adequately address that the port will be in a humpback whale resting and calving hot spot. Proposed mitigation measures are generalised and the development will likely result in avoidance behavior of marine mammals, increased stress and boat strikes.

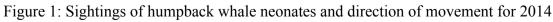


## Sincerely

## Olaf Meynecke

## CEO HHR





whale watch with a difference...we need you to care



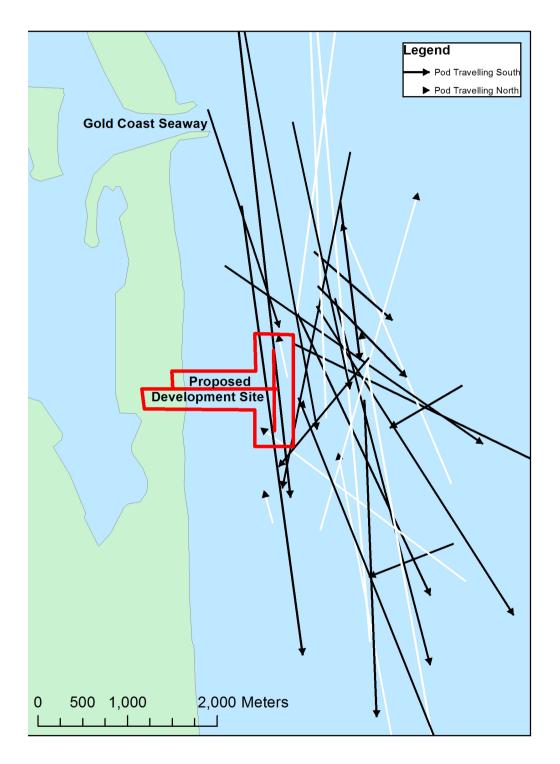


Figure 2: Selection of tracks of humpback whales observed during surveys in relation to the proposed development.