17th December 2014

Feedback Minister’s roundtable

Andrew,

A wife-beater’s wife is unlikely to have anything good to say about her husband. Don’t expect the environment movement to say nice things about the erosion of environmental protection. The reason we do what we do is because we see the punishment our environment suffers. Beatings are just not nice and we don’t just accept the excuses about why the beatings are good for us.

One of the mistakes we make is putting policy advice above scientific advice

Hi Claire,

I should not have addressed my concerns about the report-card so overtly passionate. I apologise for the lack of effectual explanation.

It is bioavailable metals that caused the ecological stress in Gladstone harbour.

It is the secret squirrel behaviour surrounding data that I abhor.

I am sick to death hearing the bullshit about commercial and in confidence excuses about why the assays and methods cannot be made public. They are just numbers.

Ask yourself why any of the companies involved even spend money to have the work done. Is it not to satisfy a requirement that their activities do not harm? Is the work not done to protect us and the environment? So what purpose does holding the information back serve but to hide the fact that harm is potentially being done?

If the companies do things in secret that is their prerogative, but if they do things in secret that impact on us, that is not OK. If they are required to prove to us, the people that their activities do no harm, they should be accountable. The methods they use must be open to public scrutiny, not just a bumbling regulator or select group of closed minded individuals.

The GHHPS started off with all the bravado about open and accessible data but has descended in exactly the behaviour I predicted, of hiding the data and manipulating the results to bullshit the public about the facts.

To iterate: The report card is not science; it is rubbish and unnecessarily obfuscates things.

ANZECC guidelines are NOT science.

Shifting thresholds for alumina concentrations to achieve a more palatable report-card is not science.
Cherry picking data is not science.

Trying to argue that the report card is scientific undermines any positive potential that the GHHPS program may provide.

Underneath it all, there are just numbers generated by a stochastic process. That is the simple reality. Do not assume the arrogance to be the sole interpreter of the meaning of the numbers.

Literally, millions of dollars were spent generating numbers and the investment failed to identify the cause of the environmental harm inflicted on Gladstone harbour. Not that the authorities and proponents haven’t tried to bullshit their way through this. The experimental designs simply were not skilful enough.

It is a mistake to elevate data above its capacity. We should not be dealing in voodoo.

Let’s look at Pilot Report Card 2014

The numbers are mumbo jumbo.

It is profoundly inappropriate and NON scientific to normalise the data.

Take copper, thresholds in the ANZECC guidelines are pitched at an arbitrary % of species “protection”. Your choice to normalise to 0.3 $\mu$g$L^{-1}$ or 1.3 $\mu$g$L^{-1}$ micrograms shifts the reference more than 400%. As you see from the table when moving from a shift from 99% level of protection to 95% species protection.
But like I said, ANZECC guidelines are NOT scientific. What is this “protection” they speak of? What the bloody hell is going to be triggered. To understand this you need to look at the assumptions made in the guidelines and the linking they did to actual scientific work. And that is where it all falls apart. Very rarely, if ever is the scientific work relevant to the particulars of a specific ecosystem of interest.

As it turns out invertebrate marine species are particularly sensitive to copper, e.g. corals. If we choose to reference copper from the arbitrary 95% column, we quite specifically remove corals from “protection” and we know we had coral colonies in our harbour. Not only is the 95% threshold inappropriate for reef sustaining ecosystems, the dynamics of the system itself influences the toxicity to some species e.g. ...sensitivity....juvenile banana prawns Penaeus merguiensis increased with decreasing salinity (Denton & Burdon-Jones 1982). The 96-h LC₉₀ decreased from 6.1 mg/L at 36‰ salinity to 0.72 mg/L at 20‰ salinity.

In case you missed the significance of this, the toxicity of copper to this species increases an order of magnitude in brackish water, like when the system floods. It is only one of the myriad of species that was actually studied and then not even in Gladstone harbour. Copper toxicity to banana prawns also increased with increasing temperature.

To reduce water quality assessment to is bullshit.

What you are doing with report cards is very bad.

It is misleading and deceptive and in this case unaccountable and as such open to manipulation.

Sincerely,

Jan Arens

President – Gladstone Conservation Council