



Gladstone Conservation Council Inc.

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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.



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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 merguensis* increased with decreasing salinity (Denton & Burdon-Jones 1982). The 96-h LC₅₀ 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