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Tourism WA File: IPD/0721



The Chairman  
Environmental Protection Authority  
PO Box K822  
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Attention: Dr Sue Osborne

<b>Department of Environment and Conservation</b>	
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Dear Dr Osborne

ETA

**YANNARIE SOLAR SALT: ENVIRONMENTAL REVIEW AND MANAGERMENTS PROGRAMMME (ERP) - (ASSESSMENT 1521)**

Thank you for the opportunity to provide comment on the proposed Yannarie Solar Salt project in the Exmouth Gulf. This area lies within the tourism marketing zone designated as *Australia's Coral Coast* (ACC), which contains some of the State's most widely recognized natural landscapes and marine environments.

Tourism Western Australia (Tourism WA) is the Western Australian Government's tourism agency that, in partnership with the wider tourism industry and other government organisations, is charged with implementing the Government's tourism agenda, including the development and marketing of WA as a highly desired tourist destination.

Western Australia has traditionally marketed itself to the world on the basis of the unique and diverse landscapes, fauna and flora found here. The Shark Bay World Heritage Area is one of four sites in Australia that meet all four criteria for natural heritage. The Ningaloo – North West Cape is currently under consideration for World Heritage listing based on its natural assets.

**Tourism Overview: Australia's Coral Coast**

The Coral Coast regions 650,000 visitors spend in excess of \$350m annually and stay more than 3.7million bed nights each year. The Shire of Exmouth receives 14% of the regions visitors and the Shire of Carnarvon (including Coral Bay) receives 23% of the regions visitors. The Tourism industry in this region is a significant export earner for Western Australia with 27%<sup>1</sup> of the Shire of Exmouth's visitors being from overseas. This is a relatively high proportion when compared with other major tourism regions within the State. For example, the Augusta Margaret River Shire attracts only ten percent of its visitors from overseas.<sup>2</sup>

Both the Shark Bay World Heritage Area and the Ningaloo area are considered Western Australian tourism icons. The rich biodiversity of the ACC forms the basis for the vibrant, sustainable tourism industry that attracts a significant number of domestic and international visitors.

**Tourism Attributes of the Exmouth Area**

Exmouth sits at the northern end of North West Cape and is adjacent to one of Western Australia's most iconic marine and terrestrial areas, Ningaloo Reef. The waters of the Exmouth Gulf are an

<sup>1</sup> Tourism Western Australia 2005, Shire of Exmouth Tourism Fact Sheet 2005, p3

<sup>2</sup> Tourism Western Australia 2005, Shire of Augusta-Margaret River Tourism Fact Sheet 2005, p3

important recreational asset as well as an important fish and sea mammal "nursery". The current holiday planner for ACC<sup>3</sup> describes Exmouth as -

*"....supremely positioned between the grandiose landscape of the Cape Range National Park and the underwater fantasia of the Ningaloo Marine Park.*

*This prime location attracts visitors from far and wide, keen to explore the landscape, dive or snorkel the Ningaloo reef, fish or simply enjoy the relaxed beach lifestyle"*

The gulf contains large sea grass beds and is home to a diverse range of sea mammals including dugong, dolphin and turtle populations. The area is also an important resting area for whales on their migratory journeys along the Western Australian coast.

### **World Heritage Listing**

The Ningaloo - North West Cape is currently being considered as Western Australia's third World Heritage Area. Any World Heritage Listing is based on fulfilling at least one of the following ten criteria:-

- i. *to represent a masterpiece of human creative genius;*
- ii. *to exhibit an important interchange of human values, over a span of time or within a cultural area of the world, on developments in architecture or technology, monumental arts, town-planning or landscape design;*
- iii. *to bear a unique or at least exceptional testimony to a cultural tradition or to a civilization which is living or which has disappeared;*
- iv. *to be an outstanding example of a type of building, architectural or technological ensemble or landscape which illustrates (a) significant stage(s) in human history;*
- v. *to be an outstanding example of a traditional human settlement, land-use, or sea-use which is representative of a culture (or cultures), or human interaction with the environment especially when it has become vulnerable under the impact of irreversible change;*
- vi. *to contain superlative natural phenomena or areas of exceptional natural beauty and aesthetic importance;*
- vii. *to be outstanding examples representing major stages of earth's history, including the record of life, significant on-going geological processes in the development of landforms, or significant geomorphic or physiographic features;*
- viii. *to be outstanding examples representing significant on-going ecological and biological processes in the evolution and development of terrestrial, fresh water, coastal and marine ecosystems and communities of plants and animals;*
- ix. *to contain the most important and significant natural habitats for in-situ conservation of biological diversity, including those containing threatened species of outstanding universal value from the point of view of science or conservation.*

*The protection, management, authenticity and integrity of properties are also important considerations.*<sup>4</sup>

In terms of a natural area listing it would be more likely that, in general, World Heritage values would be found in criteria *vi* to *ix*. Though the Yannarie Salt project will be contained within an area not included in the boundaries of the proposed World Heritage Area it certainly lies within the area that influences the rich bio diversity of the North West Cape and has the potential to adversely impact on the integrity of the site.

The Western Australian Planning Commission (WAPC) in its *Ningaloo Coast Regional Strategy Carnarvon to Exmouth*<sup>5</sup> identified all of the waters adjoining the Yannarie site as a "proposed

<sup>3</sup> Australia's Coral Coast Regional Tourism Organisation, Australia's Coral Coast, Western Australia Holiday Planner 2006, p71

<sup>4</sup> UNESCO World Heritage Centre, Operational Guidelines 2005, Natural Criteria - <http://whc.unesco.org/en/criteria/>

<sup>5</sup> Western Australian Planning Commission (WAPC) 2004, *Ningaloo Coast Regional Strategy Carnarvon to Exmouth*, Western Australian Planning Commission August 2004

marine protected area" (37:Fig.4) and the general area, that is, the land and waters as a "significant environmental area" (195:Fig.33).

#### **Use of Tourist Accommodation during the Project's Construction Stage:**

The Environmental review states, "The project will create up to 500 indirect jobs through the construction and operational phase".<sup>6</sup> A concern here is the potential for the project to take up the supply of tourist accommodation at the expense of genuine tourists, which may result in short term revenue to operators but may result in tourists by-passing the town in future years.

#### **Tourism and Yannarie Salt Project**

Though strictly speaking there is limited tourism activity in the eastern section of the Exmouth Gulf there are concerns that the size, location and expected life-span of the proposed development (nearly 70 kilometres in length with a project life of 60 years) have the potential to impact on the marine environment.

Tourism WA is not in a position to comment on environmental issues but is very much aware that any loss of biodiversity will impact on the integrity of the tourism product and ultimately the experience of visitors. Much of the advertising collateral for the Exmouth and Ningaloo area focuses on marine experiences that are quite unique, such as swimming with Whale sharks, and these experiences are much sought after by visitors.

It is noted that the *Environmental Review & Management Program*, prepared by the proponents of the Solar Salt project, identified the Gulf as having an abundance of whales, dugong, dolphins and other marine species and that they would be subject to additional disturbance in the course of loading operations. Recent research carried out on the dolphin population of Red Cliff Bay near Monkey Mia attributed boat engine noise as a possible cause of lower birthing rates in the dolphin population which had the potential to seriously deplete the number of dolphins found in the Shark Bay area.<sup>7</sup> The increased noise associated with the transit of large vessels and the loading operations over a long period of time (60 years) may pose a similar problem to that identified in Shark Bay.

The transit line used by carrier vessels could impact on whale shark tour operations as whale sharks are predominantly a deep water fish with little research known of their behavioral pattern. These tours are a major marketing tool used both internationally and domestically to promote the region and Australia in general.

Any loss of fish breeding stock in the Exmouth Gulf would have a detrimental affect on visitation to the region by the recreational fishing community.

It is unlikely, as claimed by the proponent, that tourism opportunities would be developed on site as previous experience with similar sites has shown that logistical, insurance and cost considerations make it unlikely to be a viable tour activity.

Tourism Western Australia does not have the scientific capacity to comment on the technical issues addressed in the *Yannarie Solar Salts Environmental Review and Management Programme* but is aware of the current debate on the project. Other, more qualified agencies will no doubt provide comment on the scientific veracity of the Review and Management Programme, however, in terms of the project's potential impact on tourism, our concerns can be summarized as follows:

- The large scale and extended life-span of the project
- The potential impact on World Heritage listing

<sup>6</sup> Straits Salts Pty Ltd, 2006, Yannarie Solar a Straits Initiative, *Environmental Review & Management Programme*, Environmental Review Volume 1 section 3.2

<sup>7</sup> Bejder, L. (2005) *Decline in Relative Abundance of Bottlenose Dolphins Exposed to Long Term Disturbance*, Conservation Journal

- The potential impact on the marine and terrestrial environment and (given the direct link between the environment and the Tourism industry the potentially devastating impact that any serious environmental impact would have on the region's tourism industry
- The use of tourist designated accommodation by a construction workforce to the detriment of visitors.
- Disturbance to marine animals, particularly whales, dolphins and dugongs during loading and transiting operations.

Whilst Tourism WA understands the need for economic diversity in regional Western Australia unless there is clear demonstration that all of the fears above are without foundation we would not be able to support this project. Again, thank you for providing Tourism Western Australia with the opportunity to comment on this project.

Yours sincerely

A handwritten signature in black ink, appearing to be 'R. Muirhead', written in a cursive style.

RICHARD MUIRHEAD  
Chief Executive Officer

21 February 2007

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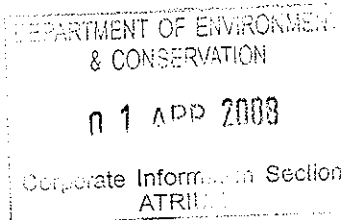
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Tourism WA File: IPD/0721

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**Attention:** Dr Sue Osborne

Dear Dr Osborne

**YANNARIE SOLAR SALT FARM PROPOSAL (ASSESSMENT 1521) SUPPLEMENTARY INFORMATION**

Thank you for the opportunity to provide comment on the Yannarie Solar Salt Farm revised proposal for the Exmouth Gulf.

Tourism Western Australia's (Tourism WA) purpose is to develop, promote and protect Western Australia's iconic tourism experiences. The agency therefore has an interest in the plans relating to industrial development in one of Western Australia's most iconic nature based tourism regions. The Ningaloo Reef is without doubt the State's, and arguably the nation's, most unique and pristine coral reef environment that is promoted to a global tourism audience.

Although Tourism WA is not familiar with the environmental intricacies of mineral resource development on terrestrial or marine environments, it can comment on the risk that such a development could have on the region's largest industry – tourism. Tourism within the Gascoyne is an industry that solely depends on the natural environment for its success. Any negative influence on the marine and terrestrial environment could have a devastating impact.

Tourism is a sustainable industry that will continue long after mineral resources are expended. It is an industry that not only contributes to the economic base of the region, but generates employment opportunities for the community including jobs for young and Indigenous people. It is an industry that adds to the social and cultural fabric of communities by providing quality infrastructure, services and events that enhance lifestyle.

Tourism is the Gascoyne's largest industry contributing some \$172 million pa (2004/05) to the regional economy. In comparison, the region's salt producing industry accounted for only \$46.8 million.

Tourism WA's *Tourism Accommodation Development Register (December 2007)* identifies that there are some \$49.5 million in tourism accommodation developments in the planning or under construction. The flow-on affects of these projects, in terms of employment, economic and social benefits are significant. In contrast the Yannarie project identifies employment for up to 75 people in the operational stage – how many of these will be permanently based in the region and how many will be fly in-fly out employees.



As identified above, the region's tourism industry is founded on 'nature based/eco' experiences, such as dolphins at Monkey Mia, whale sharks at Ningaloo, outback encounters at Mount Augustus, wildflowers during the season, turtles and whales at Exmouth and blowholes at Carnarvon. The tourism perception of the Gascoyne is one of a clean, pristine, green environment – a stark contrast to the image that the mineral resource industry projects.

The ambience of this nature-based tourism destination is already being challenged by the influence of the encroaching oil and gas industry – to the west and in the adjacent Pilbara. The Yannarie salt project now proposes to industrially develop the area in the Exmouth Gulf. This is of concern as tourism operators are just beginning to utilise the waters of the Exmouth Gulf to extend the tourism product of the region. Tented accommodation has been constructed on Fly Island; Bullara Station is diversifying into tourism with new accommodation, tours and viewing areas at the Gulf's southern extremity; whales are appearing in significant number in the waters outside of the new four star Novotel Ningaloo; and dolphin, manta ray and dugong are all active in the Gulf. It should be noted that the Government has proposed nominating the Ningaloo area for World Heritage listing.

Recent research in Shark Bay, undertaken by the Department of Environment and Conservation, identified the need to reduce the number of licensed cruise boat tour operators from two to one to prevent a decline in dolphin breeding. This was implemented to protect the natural resource that attracted visitors to this area.

Similarly the question remains, will increases in ocean-going traffic and the dredging spawned by the Yannarie salt project impact upon aquatic mammal habitats in the Exmouth Gulf – the very resource upon which the tourism industry depends.

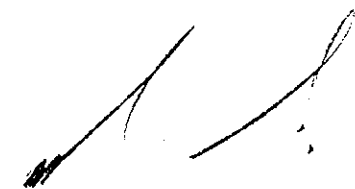
The land based side of this salt project venture, with its long sea wall and bitterns, may still be at risk of a concentrate nutrient run-off into the Gulf at the two ends of the wall. The bitterns could be subject to spillage into the Gulf in severe weather events, rising sea levels or if the salt operation finds it necessary to dispose of the salt pond contents.

Thus the revised proposal does not allay fears that the Yannarie salt project poses a threat to the conservation value in the area and that environmental impacts are likely to be adverse to the current, and expanding, nature based tourism industry in this area.

Whilst the environmental issues surrounding the Yannarie Salt Farm proposal may be manageable from an engineering perspective, the proposal does raise the issue of the cumulative impacts of a host of land and aquatic uses (eg salt farms, aquaculture, mining, petroleum, etc) on a sustainable industry like tourism.

It is therefore recommended that the Environmental Protection Authority considers the need for a broader level of planning that takes into account all sectors of the economy within a region to ensure that industries can exist collaboratively.

Yours sincerely



RICHARD MUIRHEAD  
Chief Executive Officer

28 March 2008