

# Feedback on Draft Noosa River Plan version 2

The information below provides a collation of detailed feedback on the Draft Noosa River Plan received from the community during the public consultation period from 2 December 2019 to 15 January 2020.

This feedback consists of responses to the Noosa River Plan SURVEY published on Council's *Your Say Noosa (YSN)* website, and written submissions received from individuals and organisations.

Five questions were posed in the SURVEY:

- 1. Do you support Council seeking to buy-out and eventually close the beam trawl fishery in the Noosa River?
- 2. Would you help champion a *Zero Litter to the Noosa River* strategy that incorporates three management interventions working together i.e. (i) a targeted campaign to influence littering behaviours (ii) further infrastructure solutions to reduce litter loads to waterways, (iii) continued support for river/beach clean ups to decrease litter deposited in and around waterways?
- 3. Everyone has a shared responsibility as *stewards of the river catchment* and the plan highlights a number of programs and initiatives to foster this *stewardship* how would you like to become involved?
- 4. When Council endorses the River Plan for implementation how would you like to be kept informed about its progress and achievements?
- 5. Are there any further comments you wish to make about the Draft Noosa River Plan?

# Summary of feedback

69% of survey respondents identified they would support a council buy-out and closure of the beam trawl fishery in the Noosa River, whilst more than 90% identified they would help champion a zero Litter strategy. *Refer page 2* 

Actions, concerns and comments relating to how people would like to become involved in caring for the river (i.e. as river stewards), relate to the three broad management themes outlined in the Draft Plan:

- river health and biodiversity
- sustainable use and enjoyment
- working together
   Refer pages 2 to 5

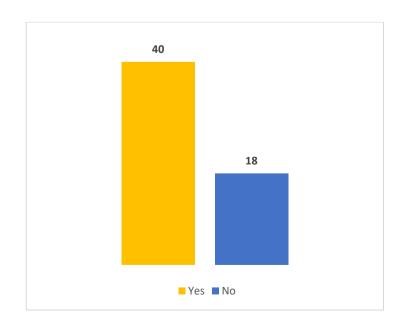
The top four (4) preferred ways to be kept informed of the Draft Plan implementation and achievements were identified as:

- media releases
- social media
- newsletters
- targeted meetings on specific topics Refer page 5

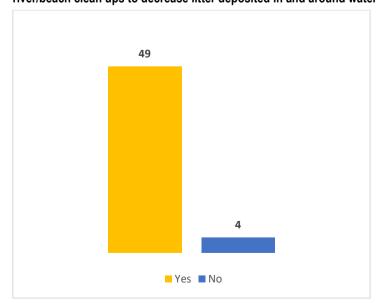
Further comments about the Draft Plan relate to a broad themes including:

- river health and biodiversity refer pages 5 to 8
- speed limits and public safety refer pages 8 to 9
- marine zones and jet skis refer pages 9 to 11
- anchoring, mooring and living on the river refer pages 11 to 14
- marine infrastructure refer pages 14 to 16
- commerce refer pages 16 to 18
- working together refer pages 18 to 19
- draft plan refer pages 19 to 30.

Question 1 - Do you support Council seeking to buy-out and eventually close the beam trawl fishery in the Noosa River?



Question 2 - Would you help champion a Zero Litter to the Noosa River strategy that incorporates three management interventions working together – i.e. (i) a targeted campaign to influence littering behaviours (ii) further infrastructure solutions to reduce litter loads to waterways, (iii) continued support for river/beach clean ups to decrease litter deposited in and around waterways?



Submitter	Submission / Grounds of Submission
Boating Industry Association (BIA)	SUPPORTED in part.  - Any commercial fishing on the Noosa waterways (not just the river) must be sustainable.  - Beam trawling on the shallow river and lake system for example should be reviewed to ensure no damage to seabed, sea grasses or fish breeding habitat.  - Any 'buy out' or 'closure' should be a matter for the State Government, not Council.
Private	Leave the commercial fishing sector alone. We love our fresh local product.
Private	I believe the Noosa council should remember its role in the community.  - It is not council's job to interfere in state run fisheries.  - It's the job of the council to ensure the rubbish gets picked up weekly and the parks are kept clean.  - The Noosa council should stop listening to a minority of misinformed rec fishers and the further misinformed over opinionated green group lead by Nick Heath and their views to how a state fishery should be managed.  - Commercial fishing in Noosa primarily ocean hauling pre-dates any of the residents on the NNS that complain about the commercial fishing.
Noosa Jetty Builders	I do not support Council buying out fishing leases and sees such as a highly inappropriate use of limited community funds.  Any buyouts should be funded by the State that controls such permits.  Action required - Amend the aspiration to refer any buyouts to the State for funding
Noosaville Business Association, Noosa Commercial Boatman's Association	Our Association does not support Council buying out fishing leases and sees such as a highly inappropriate use of limited community funds.  Any buyouts should be funded by the State that controls the permits and earns the associated revenues.  Action required by Council - Amend the aspiration to refer any buyouts to the State for funding

Q2. Would you help champion a Zero Litter to the Noosa River strategy that incorporates three (3) management interventions working together i.e. a targeted campaign to influence littering behaviours, further infrastructure solutions to reduce litter loads to waterways, and continued support for river /beach clean ups to decrease litter deposited in and around waterways?

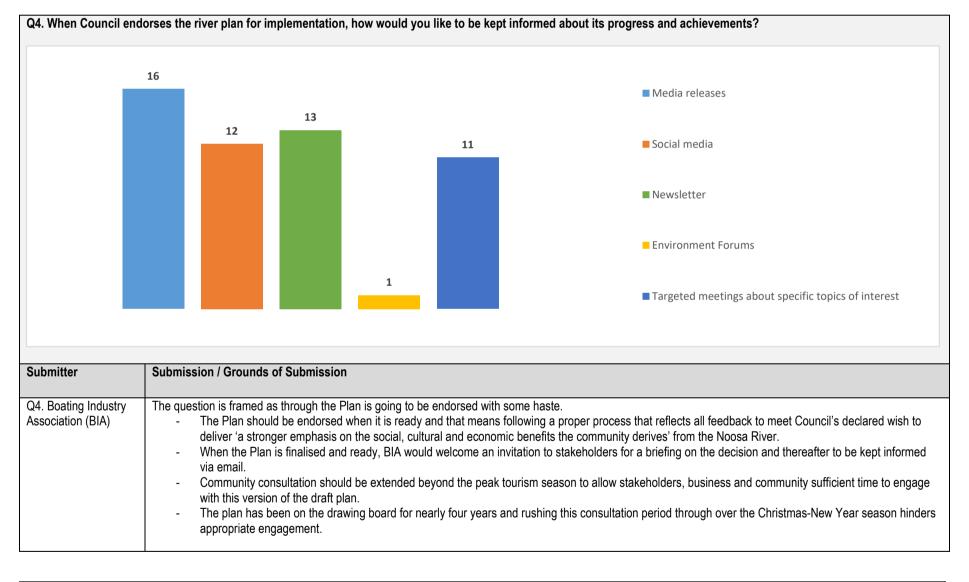
Submitter	Submission / Grounds of Submission	
Submitter	Submission / Grounds of Submission	
Boating Industry Association (BIA)	SUPPORTED.  - Furthermore, BIA would encourage Council to ban single-use plastics over time via a pledge for businesses whereby they can voluntarily opt in, join the pledge community, to a date of 4-5 years.	
Department of Environment and Science - Queensland Parks and Wildlife Service (QPWS) and Partnerships	<ul> <li>QPWS is supportive of the strategic management direction to reduce litter entering and impacting the river.</li> <li>QPWS welcomes the opportunity to maintain our relationship with council, to ensure mutual benefits are derived from the planning objectives, including public education messaging consistent with NSC initiatives such as zero litter to river.</li> </ul>	
Noosa Jetty Builders	<ul> <li>Litter</li> <li>Council has worked on the Plan for over 3 years and should have more specific strategies for litter reduction than just putting forward vague references to 'develop a strategy'.</li> <li>There should be a more structured process of collecting rubbish from riverbanks.</li> <li>The strategy of relying on volunteer groups is an inadequate response.</li> <li>Action required</li> <li>Plan should provide more specific actions for litter reduction in the Implementation Plan other than relying on volunteers.</li> <li>Plan should outline specific actions for dealing with large rubbish such as furniture which is regularly dumped on riverbanks and/or strategies for high usage areas.</li> <li>Plan should outline strategies for individual waterways and zones such as Everglades, Noosa Waters, lakes and urban areas which have different profiles.</li> </ul>	
Noosaville Business Association, Noosa Commercial Boatman's Association	Litter (as per comments above with changes or additions) and littering  Council has worked on the Plan for several years and should have more specific strategies ready for implementation than just putting forward vague references to 'develop a strategy'.  For example, there should be a more structured process of collecting rubbish from riverbanks.  The strategy of relying on volunteer groups is an inadequate response.  The Plan does not consider the adequacy of Council's current rubbish collection schedule for major public areas such as the Noosaville Foreshore or Lions Park.  Overflowing rubbish bins are commonplace in peak holiday periods.  Action required by Council  Plan should provide more specific actions for litter reduction in the Implementation Plan other than relying on volunteers.  Plan should outline specific actions for dealing with large rubbish such as furniture which is regularly dumped on riverbanks and/or strategies for high usage areas.  Plan should outline strategies for individual waterways and zones such as Everglades, Noosa Waters, lakes and urban areas which have different profiles.  Review adequacy of rubbish collection schedules for riverbank parklands.	

Q3. Everyone has a shared responsibility as stewards of the river catchment & the river plan highlight s a number of programs and initiatives to foster this stewardship, how would you like to become involved?	
Submitter	Submission / Grounds of Submission
	THEME: RIVER HEALTH AND BIODIVERSITY
Private	I am already involved with coordinating random and annual underwater clean ups of the river estuary. We find the best time is directly after holiday seasons. This is when we haul out more than we should be of discarded human litter especially fishing tackle.
Private	Prepared to be involved in litter removal.
Private	Clean ups.

Private	Removal of river rubbish. I can volunteer and provide a boat to assist.
Private	Clean ups.
Private	Keeping environmental clean.
Private	Cleaning up the river
Private	My involvement is picking up rubbish around the river when I see the need to. And that's not that often because we have a fairly clean river thanks to our mostly responsible water lovers.
Private	Have and will continue to collect marine debris in the river estuary and on its banks.
Private	I would be keen to assist with any clean up initiatives
Private	Rubbish collection days
	My 10 year old daughter would like to play a key role in the strategy to ensure that by 2030 zero litter enters the Noosa River from land based sources. Myself and in particular my daughter would like to  - Be part of the strategy used to identifying base line data being developed in the first 2 years. Since moving to the Noosa Shire my daughter has become a very active ambassador for "Plastic Free Noosa"  - Be involved with source reduction plans/strategies to reduce litter and marine debris in and around the water ways of the Noosa River.  - Be part of the regular audits that will be undertaken at key locations to track progress of the zero litter target as infrastructure and education initiatives an put in place.  - Interested in playing a key role in the implementation of education campaigns and raising community awareness of the litter reduction initiatives.  - My daughter is home schooled and has flexible learning experiences so can dedicate significant time and energy into community targeted education campaigns. She has been asked to talk at schools and environment expos, has delivered a talk at Queensland University with Plastic Free Noosa, speaks at community events and has participated in a number of environment "conferences" such as Biosphere conferences, Marine turtle conferences and source reduction workshops  - Is eager to share her passion, knowledge and experience in caring for the Ocean and waterways through education initiatives at schools and at community events and via social media and by any other means needed.  - Play a key role in advocating for the health of the Noosa River.  - Currently does many water way/beach clean ups, removes meters and meters of fishing line and tackle, old crab pots and ropes from the Noosa River.  - With assistance from the Noosa Shire Council would like to attend schools in the shire to help spread awareness and inspire positive changes in behaviours and attitudes to how we can all help look after the Noosa River and the animals that call it home.
Private	I am happy to take my kayak out and be part of the citizen science initiatives to monitor water quality and river health.
Private	I'd like there be truthful research carried out on chemical toxins outpouring into the river such as fertilisers and pesticides and herbicides. I would like to be a part of that research program.
Private	Erosion and water quality monitoring and education
Private	Urban runoff
Private	Objective 2. Fish passage barrier remediation program.  - The premise of these proposed works is that all fish barriers are negative and that habitat upstream of the barrier is suitable to support fish assemblages  - While this is typically the case, it is not always the case.  - Barrier removal has the potential to hasten the spread of unwanted exotic fish species and is of little use where is poor habitat and water quality upstream (consideration of value for money).  - These factors should be considered in any planning to remove barriers.
Private	Oyster reef restoration.
Private	Via formal Noosa Council - Noosa Parks Association partnering projects.
Department of Environment and Science - Queensland Parks and Wildlife Service (QPWS) and Partnerships	<ul> <li>QPWS is supportive of the strategic management direction to reduce sediment, [litter] and sewerage nutrient loads entering and impacting the river.</li> <li>QPWS is supportive of planning objectives to address river and beach pest species and will ensure noted pest species of cat's claw creeper, pigs, foxes and wild dogs are incorporated into strategic pest planning documents.</li> <li>QPWS again welcomes ongoing collaboration with NSC to enhance pest management efforts.</li> <li>Management of fire within the riparian and wetland habitat of the Noosa River is critically important to maintain these areas as healthy functioning systems and wildfire can impact on the integrity and health of these systems.</li> <li>QPWS and NSC work collaboratively to maintain these important habitat values whilst protecting life and property in areas adjacent to the Noosa River.</li> <li>QPWS is supportive of Noosa North Shore management initiatives to monitor nesting turtle ecology, shorebirds and conduct community clean ups.</li> <li>Where such activities require appropriate permitting or authorisation QPWS will work through authorisation process with relevant entities to ensure all appropriate legislative and cultural heritage requirements are met.</li> </ul>
Private	THEME: SUSTAINABLE USE AND ENJOYMENT  Prepared to be involved, particularly mooring/anchoring arrangements.
Private	Get rid of unregistered moorings and Anchorage's in river.
Private	I want to respond within your first objective, specifically use of the river waterways in a manner that prioritises safety.
Private	Sustainable use and enjoyment
Private	Higher amounts of boat traffic and associated public safety issues.
Private	Recreational and commercial use of the Noosa River waterways and foreshores is undertaken in a way that protects ecosystem health, respects the rivers carrying capacity and environment values, and prioritises visual amenity and public safety.
Department of Environment and Science - Queensland Parks and Wildlife	- QPWS welcomes the opportunity to maintain our relationship with council, to ensure mutual benefits are derived from the planning objectives, including public education messaging consistent with inappropriate vessel use in accordance with the Noosa River Marine Zone and Noosa North Shore appropriate vehicle access (no vehicle access zone and minimising impacts to nesting turtles and shorebirds).

Service (QPWS) and Partnerships	
Private	Jetski's (PWC) restrictions should be abolished.  - I have seen small boats behaving far worse in the river.  - If you are going to restrict certain vessels from using and enjoying the river than why not restrict all motorized vessels.
Private	Lift the ban on jet skis so we can enjoy the river as well , jetski are a lot less harmful to the environment and less wash then most boats.
Private	Government rules are already in place
Private	I would first want to know HOW (what options) are there for anchoring in the river & Woods Bay(s)  - who is going to monitor/control 'same'  - who is going to monitor the MSQ mooring buoys & positions  - who is going to grant new positions and what will be the costs associated with new & existing moorings  - will the NSC make the length of the river from Harbortown to the river mouth a 6 knot speed limit 12 months of the year???  - when these questions are answered, I would then put my hand up to become an active 'steward' of the river.
Private	My involvement would be ensuring state government calls the shots, not Noosa council.
Private	As a rate payer, I do not want to be involved because I already pay my State taxes for the QLD Govt to manage our water way.  - Get them more involved.  - Let them Police it.  - Noosa Council, I am not paying you extra as a rate payer to be involved in a Management Plan that I am not convinced you will succeed at in the long run.
Private	THEME: WORKING TOGETHER  Volunteer river ranging (eg as part of NICA)
Private	More involvement in volunteer ranger program
Private	Promote and support an Indigenous Land and Sea Ranger program for Noosa.
Private	Environment Groups needs a better managed media publicity schedule to call for helpers and implement projects to engage community involvement.
Private	Community updates and voting forums using technology like menti meter.
Private	Willing to contribute.
Private	Consultant.
Private	Leader, Enabler, Provider.
Private	Continue as an interested observer.
Private	Not sure
Private	Undecided
Private	Enabler
Private	When I can anywhere.
Private	Help raise awareness
Private	Raising awareness, education
Private	I'm unable to find a copy of the Noosa River Plan Version 2 anywhere on Council's website so I have no idea how to answer this.
Private	I'd like to see a road bridge between Noosa and north shore, stop polluting the river and atmosphere with grubby barges, just saying.
Private	I am interested in the new initiative to support an Indigenous Land and Sea Ranger program for Noosa.  - I think that Aboriginal cultural heritage has been disrespected in the catchment adjacent to Elanda Point  - A Part 6 study / site survey should be undertaken to better understand both the tangible and intangible cultural heritage associated with the Noosa River at locations where developers are encroaching on state land.
Private	I would also like to participate in any visioning and future planning associated with potential transport solutions involving the river.  - I think this is a key initiative that has not been explored properly yet and has potential in the medium to long term.
Private	Think Tank committee
Noosa Integrated Catchment Association (NICA)	NICA is interested in assisting Council in the design, development and implementation of several initiatives outlined in the River Plan including those program areas already undertaken by NICA on a regular basis.  - NICA would welcome the opportunity to meet directly with Council to progress this collaboration.
Boating Industry Association (BIA)	The BIA supports the concept of shared responsibility as stewards.  - BIA would like to offer on-going input, including advice to Council on the social, economic and environmental benefits arising from boating.  - BIA would offer support to use its networks and leverage in advocacy with State and Federal Governments and education programs to support a triple bottom line approach to boating (paddle, power and sail) activities for the waterway.

Department of Environment and Science - Queensland Parks and Wildlife Service (QPWS) and Partnerships	<ul> <li>QPWS is supportive of management objectives for ensuring appropriate Kabi Kabi First Nations peoples interests and culture values are observed.</li> <li>QPWS commit to working with Kabi Kabi and NSC to maximise opportunities and management outcomes.</li> </ul>
Noosa Jetty Builders,	Consultation
Noosaville Business	- The Plan has been prepared by Council officers with little consultation in the last 2 years.
Association, Noosa	- While draft 2 now acknowledges the cultural, social and economic importance of the river, I note Council and the plan's authors have not consulted with
Commercial	any commercial operators or industry in its development.
Boatman's Association	- Not responded to our written feedback to draft 1.
	- Not sought to establish any cooperative dialogue with commercial operators.
	- Council is only allowing a very brief consultation period during the Shire's busiest tourism season.
	- Action required
	- Council should actively consult with commercial operators in developing the next draft of this plan.
	<ul> <li>Council should announce a broader and more substantial consultation program.</li> <li>Council should extend the consultation period to beyond the peak tourism season to ensure community and businesses have sufficient time to respond.</li> </ul>
	- Council should form a River Management Advisory Group to help guide its policy direction.
	Consultation (as per comments above with changes or additions)
	- The Plan has been prepared by Council officers with little consultation in the last 2 years.
	- While draft 2 now acknowledges the cultural, social and economic importance of the river, I note Council and the plan's authors have not consulted with any commercial operators or industry in its development.
	- Not responded to our written feedback to draft 1.
	- Not sought to establish any cooperative dialogue with commercial operators.
	- Council is only allowing a very brief consultation period during the Shire's busiest tourism season.
	- Action required by Council
	- Council should actively consult with commercial operators in developing the next draft of this plan.
	- Council should announce a broader and more substantial consultation program.
	- Council should extend the consultation period to beyond the peak tourism season to ensure community and businesses have sufficient time to respond.
	- Council should form a River Management Committee or Trust to help guide its policy direction.



Q5. Are there ar	Q5. Are there any further comments you wish to make about the Draft Noosa River Plan?	
Submitter	Submission / Grounds of Submission	
	THEME: RIVER HEALTH AND BIODIVERSITY	
Private	Holidays:  - I believe Council should employ litter inspectors to patrol the river at least in the heavily frequented areas such as the river estuary.  - We haul out tons of litter after every holiday season from under the water.	
Private	I live close to Keyser Island, a national park / bird reserve in the Noosa River system, and it is  - very hard to police people who camp, light fires, and pollute on this island.  - The authorities that have a boat, are rarely in Noosa, and those that have authority, do not have access to a boat.  - Can there be more done to control this negative behaviour by giving more powers to or access to the islands by the right authorities.	
Private	Get serious about litter:  - Businesses located on or near the river should be monitored more closely for the litter they produce that ends up in the river.  - No Plastic products should be allowed for takeaway containers in the local area.	

Ban smoking from river based businesses and all the riverside areas - this should be a healthy environment and wedding/party venues should not be forced to control their impact. A-frame signs are insignificant compared to other forms of pollution you can see every day by the river, including noise pollution. Businesses should not be allowed to sell takeaway food from vessels. This rule should apply to ALL businesses who have the privilege of being on the water. As usual, some businesses get away with more than others. Private Issues like Zero littler to the Noosa River (#3) should be in place since long ago. Private As a daily river user, we believe that more education and more enforcement of laws protecting the river must be enforced. Some litter fines handed out along Gympie terrace might help as the amount of rubbish and cigarette butts along this section of the river is terrible. Local business must transition to biodegradable takeaway items and could reinforce the message to customers of putting their rubbish in the bin. Littering is a huge problem along the foreshores of the river and is getting out of control. All drains that lead to the ocean must have litter exclusion devices attached to them and monitored and emptied just like the shire has a bin collection. There needs to be a litter exclusion device collection/empty day. This needs to be ongoing whilst transitioning to no litter entering the Noosa River by 2030. The litter collected in these devices with set base line data and help with source reduction plans to address the problem. Private I noticed nothing said about the horse riding on Noosa North Shore where horse manure is dropped all over the beach and is washed up on the high tide line. Surely this contributes to an excess of nutrients in the water and therefore the algal blooms. The solution is simple, require horses to wear manure catchers as they do overseas or require horse owners to pick up their horses droppings similar to dog owner requirements. I would also like to recommend that Noosa North Shore be made a glass free zone on beaches and for campers as the amount of broken glass now being washed up is ridiculous and dangerous. This could be policed at the ferry (also at Rainbow Beach) with offensive materials surrendered and fines issued! I love the river and the shire, keep up the good work, you have my full support! Noosa Jetty Pollution – Industry Sources (page 29) The report should consider what code or standards are appropriate for the maintenance of marine infrastructure. Builders, **Noosaville Business** Action required Association, Noosa Plan should work with industry to develop Codes of Practice. Pollution – Individual practices (page 30) Commercial Boatman's Plan does not address the significant lack of public toilets along the swimming areas of the Noosa River, specifically the Noosaville Foreshore. The lack of toilets results in human waste entering the river on a daily basis. Association Action required Plan should propose additional public toilets be developed in key areas. Public toilets (page 35) Plan does not address the significant lack of public toilets along the swimming areas of the Noosa River, specifically the Noosaville Foreshore. The lack of toilets results in additional human waste into the river. Actions required Plan should ensure additional public toilets are developed in key areas. Public toilets (as per comments above with changes or additions) Plan does not address the significant lack of public toilets along the swimming areas of the Noosa River, specifically the Noosaville Foreshore, Woods Bay or Dog Beach. The lack of toilets results in additional human waste into the river. Actions required by Council Plan should ensure additional public toilets are developed in key areas. **Noosaville Business** Other pollution sources (page 33 & 38) The report is silent on the severity and regularity of sewerage overflows and/or the adequacy of current sewerage systems. Association, Noosa Commercial In December 2019, a large area of Noosa Sound was flagged as contaminated due to another leakage. There are many previous examples of sewerage overflows. Boatman's Association Action required by Council Plan should reference adequacy of sewerage infrastructure to ensure Council and private sewerage infrastructure cannot leak into the Noosa River. Other pollution sources (page 34-36) Plan notes the disposal of pet waste is a potential contaminant however has stopped supplying disposal bags in public areas as part of its plastic reduction Consideration should be given to bio-degradable bags or other solutions in at least the major public areas such as Noosaville Foreshore. Action required by Council Investigate animal waste disposal alternatives to plastic bags in major public use areas. Erosion: focus is on Spit/dog beach area Private Biggest risk to mangroves/North shore habitat is erosion to tip of north shore and Frying Pan area since river has forced its way out over there. No one seems to care about that side. Stopping all boat traffic and let skis in this area would be a good start. Also since the RAMSAR sign was washed away there is no indication / enforcement of the habitat for wading birds. Take some drone photos during holiday times and you will see hundreds of pleasure boats/hire boats all over that area. Wildlife has no chance of recovery now there are so many boats. Shut off all mangrove areas to recreational boats and fishing to allow preservation of fish habitats. Conduct boat counts at boat ramps and empty trailers to get some real data of the size of the problem. In the last 5 years of working on the river the increase in traffic has been notable. There is no restraint on this, the trailers themselves parked for weeks on streets provide a hazard to cyclists and pedestrians and add to the parking problems. Private River bank erosion of 1.5 meters in five years on Hilton Esp needs stabilisation similar to the good work on Gympie Tce. No rock walls please. Controlling weeds along river. Private Regeneration and huge importance needs to be placed on marine ecosystems that help fight climate change such as Mangroves. Private Mangroves need to be protected and replanted along the Noosa River to help fight climate change. These ecosystems store far more carbon then terrestrial ecosystems. Set aside areas for regeneration and replanting of these ecosystems as the benefits to the Noosa River and the planet are huge. Please look into this. Private Oxleyan pygmy perch (OPP) and honey-blue eyes (HBE) are mentioned as threatened species of value but no plan of action is recommended. There are real and current threats to OPP from activities in the catchments such as development and habitat fragmentation which are under the stewardship of Noosa Council. While HBE populations are thought to be stable in the upper Noosa River catchment there is little to no monitoring that occurs (incidental EHMP surveys that are not targeted at best).

Drivata	Lidan't think it good for angush in protecting Lake Weyler and recognizing its importance on a fish purpose. Leften and each note used and hydrets of small fish cought
Private	I don't think it goes far enough in protecting Lake Weyba and recognising its importance as a fish nursery. I often see cast nets used and buckets of small fish caught which has me thinking that whole schools are being destroyed.
Private	I would like to see natural artificial berms placed in the river at strategic points with information for tourists to read how important they become for fish habitat.
Private	Closure of beach netting on the north shore - all the mullet leave the Noosa river and are netted on the beach - I fully support ceasing this activity.
Private	<ul> <li>Determine appropriate locations to reintroduce fish structure/snags.</li> <li>Need to also address commercial beach worm harvesting as well as pipis.</li> <li>Need for research pilot projects in nutrient removal by algal growth.</li> <li>Climate change probability of crocodiles entering the system</li> </ul>
Private	85% of the Benthic fauna has been lost over the last 20 years best advice is this has been the result of a number issues - most prominent is the settling of silt in between the grains of sand - coupled with suspended sediment in the water column creates an ongoing issue for benthic fauna.
Private	Recently, I sent Noosa Council a letter concerning the draft Noosa River Plan and its findings and recommendations and made critical reference of the need for a rural roads sediment study.  - My assumption was that this study, although recommended, would not be actioned.  - I was wrong, and for that I apologise.  - I note in a further reading of the river plan that such a measure is contemplated.  - Hopefully it will be one of the first actions taken, as it will provide clarity and context around the current debate about the benefit and cost of sealing unsealed rural roads in the hinterland.  - I acknowledge that much effort has gone into preparation of the draft Noosa River Plan.
Private	Please return the signs saying "No Dogs on Beach" along the length of Pelican Beach from Weyba Road along to the Yacht Club.  - My friends and I have seen dogs defecating and urinating on the sand and in the water where children play.  - We get abused if we say anything and it would be easier if there were signs as there used to be.  - You can't be serious about keeping the river clean unless signs are erected.
Private	There needs to be more protection put in place for the animals and in particular the sea/shore birds that the river is home to. Education campaigns need to be devised and implemented to  - Ensure the safety and survival of the birds along the river banks and also the migratory birds trying to recoup and nest around the river mouth. Dogs and people/kids are seen on a daily basis chasing huge flocks of seabirds that rest on the sand bars near the river mouth.  - Inspire change in people's attitudes and behaviours so that people will see the need or want to help protect these animals. That is what my daughter Jarrah wants to do, educate and inspire river users to help protect the Noosa River and the animals that call it home.  - I suggest removal of all the out dated, faded, hard to read and damaged signs along the Noosa River. These old/ugly damaged signs could be replaced with fresh signs with beautiful imagery of what the Noosa council is helping to protect and suggestions on how we can help protect the river whilst visiting it. Simple yet attractive informative signs helping to educate and inspire all river users. These signs need to acknowledge traditional land owners, the indigenous peoples.  - There is an increasing concerning problem that involves children of varying ages whom come to the river to picnic with their family, these children threaten and attempt to significantly harm the wildlife (birds) on the banks and in the water, by throwing large rocks at ducks, seagulls and pelicans and show no respect for the wildlife and chase animals with sticks and rocks and try to "get them".  - We have seen people having to intervene and tell the children not to do it whilst their parents are not supervising or just sit back and watch their children trying to harm these animals.  - It is very worrying to see this behaviour in young people, hopefully through education and inspiring these children then they will learn to care for animals and treat them kindly.  - I strongly feel that education is so important in cha
Private	There must be some policing of the river by council so as to enforce non-access to certain areas by for example dogs.
Private	Instead of compliance around 4wd access to the river mouth, the plan should  - progress the closure to car access from the third cutting to the river mouth (apart from the one resident needing access)  - there is no need for this to be accessible by cars and have them parked on the river mouth  - this impacts turtle nesting sites and migratory bird areas (Objective 2).
Noosaville Business Association, Noosa Commercial Boatman's Association	Migratory seabirds  - The Plan describes the current situation but fails to provide any assessment of the current situation and whether alternate strategies are required.  - Plan fails to report why enforcement of current regulations is not undertaken on a regular basis.  - Action required by Council  - Plan should be revised to provide an assessment of the adequacy of current regulations and whether additional strategies are required as well as resourcing.
Noosa North Shore Association (NNSA)	It is extremely disappointing that many of the issues which have existed for a very long time require little to correct them and that simple prioritisation from the incumbent authority responsible would see marked improvement in many areas.  For example, Council, under Local Law 4, established a 'beach closure' on the Noosa North Shore adjacent to the river mouth."  Yet Council does not police nor manage its own local law.  Over the past few weeks, today and in the past, despite a clearly visible sign stating 'No 4WD access', up to hundreds of 4WD's drive in that zone; park there and at times camp there with no fear repercussion for any authority.  It is not a complicated matter to resolve.  Dedicated resources are required to conduct regulatory activities of the Noosa Nth Shore Exclusion Zone – especially after hours.  Both Council's Local Laws and the State's QPWS officers have tried to manage this area in the past, however this approach has been based on availability of resources and priorities. This clearly has not been adequate or satisfactory.  The river plan calls for the establishment of River Management Unit which will lift the priority and provide dedicated resources (including after hours) to proactively, rather than reactively, manage these important habitats of threatened and/or migratory species.  The Units responsibilities will also apply to the management of other river related issues e.g. unauthorised camping, unauthorised marine infrastructures, antisocial behaviour, littering, marine zone education/compliance, monitoring (i.e. water quality, recreational use etc.) and data collection.  References to marine turtles totally 2 pages Objective 2  Plan gives disproportionate consideration of turtles compared to any other marine species at risk.  Plan fails to account for any other growing or declining marine species, education and risk management programs associated with reported growth in bull

Plan is unclear as to whether it is addressing all coastal areas, just the North Shore or just the Noosa River noting that turtles only occasionally enter the Noosa River. Action required Plan should be revised to ensure a consistent approach and either, remove reference to individual marine species; or provide a comprehensive assessment of all relevant species. Plan should provide a risk assessment of species and physical risks to human users and provide appropriate recommendations. Noosa Jetty References to marine turtles totally 2 pages Objective 2 (as per comments above with changes or additions) Builders, Plan gives disproportionate consideration of turtles compared to any other marine species at risk. Plan fails to assess other growing or declining marine species, account for reported growth in bull shark and stone fish populations, address shark netting **Noosaville Business** Association, Noosa practices in Laguna Bay (which is included for some things but not others). Commercial As turtles only occasionally enter the Noosa River, and are a coastal species with only rare sightings of egg laying on adjacent beaches, the relative priority given to the species in the draft Plan seems unbalanced. Boatman's It is also noted that despite this significant discussion, no specific actions are proposed to assist this (or any other) species. Association Action required by Council Plan should be revised to balance reference to any one individual marine species and provide a comprehensive assessment of all relevant species. Focus on marine turtles is inappropriately weighted. Plan should provide a risk assessment of species and physical risks to human users and provide appropriate recommendations. The Draft River Plan refers on p.28 to 'boat strike' and the fact that 'records indicate that an order of magnitude of 50-100 turtles are killed annually form interaction **Boating Industry** Association (BIA) with vessels in Queensland. It says the majority of these occur 'adjacent to cities and ports'. BIA would ask that this context be better represented in the final Plan. Queensland has almost 7000km of coastline and there is no 'city' or 'port' at Noosa. To make any sense of this statement in the context of the Plan, Council must refer to relevant local data for the Noosa estuary where the Plan has effect. To do otherwise is to mislead the public on this matter. Especially where on p.29 there is a call for 'go slow' campaigns to respond to 'boat strikes'. It would seem more appropriate to put energy into controls (education, regulation, compliance) around vehicles and camping on beaches in order to care for breeding turtles. Taxpayers' money should NOT be spent on useless biodiversity projects such as the involving oyster bags. Our money should be spent on eliminating Private sediment run-off from the Kin Kin Creek & its surrounding properties pesticides & fertilizers entering our waterway, even if it means reclaiming land from private owners that refuse to co-operate. Only then can the river be returned to a truly pristine environment. Biodiversity will once again flourish when, & only when, this happens. Noosaville Business Oysters Association, Noosa The Plan does not adequately describe community concerns with the oyster project including the return on investment, lack of accountability and transparency of funding or outcomes. Commercial Boatman's The commitment to "Full restoration seeks to construct reefs at feasible locations" (page 20) is a serious concern in light of no alternatives being presented Association in the paper and the uncertainty of costs associated with the proposal. Action required by Council Plan needs to highlight and properly respond to community concerns with the oyster project. THEME: SUSTAINABLE MANAGEMENT AND USE Private North shore needs restrictive/permit access before it is ruined. Speed Limits and Public Safety Private Unmonitored / excessive boat speeding is causing dangerous and erosion issues in the river stretch from the Noosa River to Lake Weyba. Thank you for the opportunity to have my say. The boat speeds should be restricted to reasonable speeds. Private Currently commercial and private boat owners appear to have an "open" speed limit with the exception of the T Boats to Spit Holiday (only) zone. The wash experienced around places like the Pelican Jetty, Playgrounds etc. is at times damaging to the river bank (despite the buffers in place). More importantly, the safety of people in small craft like kayaks, surf skis etc. are at risk. Private Safety: Speed limits should apply from Tewantin all the way to the mouth, not just the Sound/dog beach area. This river is not big enough to drive at 20 knots with swimmers, kayaks, SUPS, ducks and all the other wildlife trying to survive. Really what is the rush?? The bottleneck between the T Boat / OBoat sand bank and the jet ski hire zone is a death trap to get across in a kayak or on a SUP. Allow kayaks to transit up the north shore side so they don't clog up the middle of the river. Really have a close look at weekends and holidays to see where the pressure spots really are. Thanks! Private The river plan need to adopt an ongoing over all river speed limit of no more than 10 knots (except for current water ski areas and PWC areas). This would ensure the following: Use of the river to all users. At present with the speed boat wakes restrict the rivers use for, rowers, sailing boats, paddle boards and swimmers etc. This is an unfair sharing of the river. Reduce erosion to the river banks with less wake travelling at a slower rate. Keep wild life safer on the water and on the water's edge with smaller wakes / waves. Make the river safer for all users. Reduce pollution in the river with less boat exhaust outputs at lower speed. Make policing of speeding in the river easier (particularly with "water rats") Ensure moored / anchored boats were safe with less wake / wave movement. Firstly, congratulations on the effort in preparing the visionary plan, which is clear, logical and explains many important issues that require urgent or future actions. Private My specific concern, and that of nearly every other person I have spoken to who lives on the banks of the lower river around Munna Point is Public Safety. The concerns directly relate to speed, and the ever-increasing motorised river traffic, and the total disregard a significant percentage of this traffic has for even the most fundamental maritime rules and regulations. These issues have been alluded to in the Draft Plan but unfortunately not in the direct terms I believe they should be in. I believe Council should be very specific and firm in their demands to the Maritime Safety Board given this "Partners" past performance and attitude. In my opinion demands should include permanent all year round 6 knot speed limit on the lower river from T Boats to near the river mouth. Additional visual signage on the river relating to speed limits and safety. Additional and more effective policing. It is noted that very recently some improvement has been made in this area. On this issue the MSB refused my request to release information as to speeding fines issued on the river in recent years, and it isn't hard to work out why. A public awareness campaign advising how, and who to, residents and tourists can readily report dangerous behaviour by motorised craft.

I hope the Council includes these well overdue actions as part of its Final Plan as I have no doubt unless changes are made there eventually will be fatalities or serious injuries on the river, directly related to inappropriate speed limits and reckless behaviour by an unacceptable percentage of the ever increasing number of motorised craft operators. Of great concern to me is that nearly every aspect requires cooperation from a government or semi government authority as a "Partner". History dictates that unless the Council is supported by a committed Community and takes a strong stance on various issues, genuine progress with "Partners" is most unlikely and there is a good chance the whole Plan could become like a script for an episode of the ABC series UPTOPIA. To illustrate my point about "Partners", over several years I have communicated with the Maritime Safety Board at Mooloolaba expressing my on-going public safety concerns, together with details of many instances of serious occurrences that had potentially fatal or serious consequences. All these communications are available for review by any interested parties. The Board has constantly refuted that there were any safety issues and refused my offer to come to my premises and observe what I am seeing on any good boating weather day. The Boards last response was to state they wouldn't communicate with me any further on public safety issues, an unbelievable appalling response from a Government Authority specifically responsible for safety. I mention the above to emphasise the point that unless the Council and residents are very forceful and persistent the "Partners" are unlikely to be helpful in initiating or managing the required changes despite the obvious staring them in the face. If required I am readily available to discuss the above issues in any meeting or forum. Noosaville Business Speed Limits The report rightly notes that speed limits are an issue however fails to identify the full range of issues or properly scope any future assessment which should account Association, Noosa Commercial Impact of vessel wash (boat and jetski) on other boats, jetties, ramps and pontoon (not just swimmers). Boatman's Suitability of the current area of the speed restricted zone (e.g. should the area be amended?). Association Should there be year round speed limit changes in some areas. Adequacy of signage. Lack of enforcements of speed limits in the restricted zone and upriver of the restricted zone particularly in the highly used zone between Noosaville and Tewantin. Lack of any enforcement after hours. Emergent issues such as flight boards not being governed by marine speed limits. Actions required by Council Undertake a comprehensive review of speed limits and speed restricted zones with in-depth consultation with industry and community. Increase speed monitoring and enforcement particularly in areas other than Munna Point and outside daylight hours. Noosaville Business Safety Association, Noosa Our Association considers the risks associated with people (usually teenagers) jumping into the river from the Munna Point and Sofitel Bridges to be a significant risk which is ignored in the report. Our members cite instances where Commercial Boatman's Jumpers land very close to the moving vessels ("playing chicken" and/or being unaware of the oncoming vessel). This puts the swimmer in dangerous proximity to a moving vessel and puts the boat's operator in breach of marine regulations to keep a minimum safe Association distance from swimmers. Complaints to Council have been told to call the police. When they call the police, they are advised to call the Council. Neither agency takes any action. There is a similar issue with teenagers camping on tinnies under the Munna Point bridge. This is a dangerous and inappropriate practice which is not addressed as there is no after hour enforcement. Actions required by Council Acknowledge these significant risks and propose enforcement strategies that will actively mitigate them. Private Want to draw to the council's attention as part of their waterways management plan the existence of Usafe. https://usafe-global.com/ This is an emergency response device designed to respond immediately should a resident or visitor start drowning on the Noosa waterways. It is being adopted by emergency services and municipalities with waterways risk as an important solution for ensuring residents safety on a global scale. The device was invented in Portugal and further refined with the assistance of 2 Australians. It was awarded the DAME award at METS, (the largest marine trade show in the world) as the best new product. And already there are 14 Chinese copies of our product on the market - in breach of our global patent. I mention all this to highlight that our product is becoming viewed as an essential life saving device for waterways and that you may want to consider it as part of your planning. Surf Lifesaving Australia and the Australian Navy are already incorporating our device into their future planning. I am based on the Sunshine Coast and am able to demonstrate the device if you require. Private I believe we need someone like the water police in Noosa. Private Please be more active with illegal camping along the river, there are campers every night along the river on Hilton Esplanade no toilet facilities along there and certainly don't want them as will bring more campers desperately needs to be better policed maybe more signs with a stronger message would help. Private Upstream of Munna Point is becoming more heavily trafficked. Many users obviously not aware of their responsibilities. Kayakers, canoeists, rowers, stand up paddlers and swimmers are frequently subjected to threatening wash. Notices at launching places, formal and informal, and at boat hire locations detailing jet ski use, which side of river to travel on, wash, speed and distance from other craft, swimmers and jetties, moored boats etc., fish habitats. In narrower parts of the river, e.g. Tewantin, channel markers 30+ m from shore indicating channel speed limit and 6 knot speed limit inshore. Declare all river banks sea grass and fish habitat to help combat erosion and possibly enable sea grass to regrow. In my view the Plan is deficient in that there appears to be Private No relationship to Council's zero emissions by 2026 initiative. Nor is there a recognition that any increase in the numbers of boats on the river must surely reach a point where river health is compromised to an unacceptable degree. The Noosa River is already one of the most trafficked in Queensland. I would expect the Plan to take this into account and look at some sort of cap on usage before the waterway is clogged much as some of the roads in the Shire are clogged. Further, there should be long term planning to gradually phase out vessels which contribute to carbon emissions in favour of those with electric motors, and encouragement of non-motorised vessels and activities, such as canoes, kayaks, rowboats (time for oars to make a comeback), surf skis, sail boats and stand up paddling boards. Marine Zone and Jet Skis Private Compliance with the Noosa River Marine Zone rules and objectives should be a high priority. Private I would also favour a complete and immediate ban on jet skis. They launch from the river to access Laguna Bay

One is far more likely to see jet skis rather than dolphins from Dolphin Point and their prevalence must surely be associated with reduced numbers of the dolphin, along with turtles and other marine life. Private More effort to ensure compliance of current marine zone. Jetski's (PWC) restrictions should be abolished. Private I have seen small boats behaving far worse in the river. And why can ski boats operate in the river and not Jetski's (PWC)? I have been down the Gold Coast and there are many Jetski's in operation and there are far more people living on the water down there. If the council is going to restrict Jetski's (PWC) why not all restrict all motorized vessels on the river. I support protecting the river but picking and choosing which vessels are allowed to use and enjoy the river doesn't seem fair and then to not even police the vessels you allow. Private Jet ski area to be extended to the Tewantin boat ramp. Private Address the need to allow jet ski in the river marine zone. A ski boat does a lot more damage to the bank then a jet ski. Private As you are aware, the Department of Transport and Main Roads (DTMR) recently commissioned a report that studied the current and future demand for publicly accessible recreational boating facilities within the Noosa Shire Council area over the next 20 years. The Demand Forecasting Study (2017) identified that the key issues relating to existing boating facilities included overcrowding, capacity and safety. DTMR has therefore recommended as a matter of priority the construction of new boat ramps to meet current and future demand. I think DTMR's proposal to increase boating facilities makes good sense considering the overall increase in population and recreational boating and fishing I note that Council has dismissed any option for additional boating facilities despite the heavy and rapidly increasing demand. It seems that Council's aim is to increase their authority in river management and compliance but there no support for fairer access to facilities for jet ski enthusiasts. The jet ski has become the 'vessel of choice' in recent years for fishing due to the difficulties crossing the bar and the difficulties accessing the only boat ramp available in Noosaville. When events such as the Noosa Triathlon are on, jet ski users are effectively 'locked-out' from accessing the river as there are no alternative boat ramps that can legally be used. People using jet skis for fishing are not those ratbags screaming up and down the river. We generally head off-shore to fish and return a few hours later. We are not the nuisance craft users that Council should be targeting. The current zoning prohibits jet ski use in the river west of the Noosa Waters canal inlet. This unfairly limits river access for jet ski users, particularly given many boaties have shifted to fishing equipped jet ski for fishing purposes. This pushes boaties and other craft users with trailers into local streets, consuming high demand parking areas. Can you please consider extending the personal watercraft zone further up the river into Tewantin? I am a local jet skier and my family, friends and I have been boating, skiing, swimming and enjoying the Noosa River for over 30 years and to this day am on the Private water every week if not more. For all of that time we have also water skied and wake boarded behind the jet skis which is a very healthy sport and as a family we have enjoyed it throughout our generations. My parents water skied regularly in the Noosa River too but because someone says they do not like jet skis we are not being given our right to use our river as everyone else does. We cannot water ski behind our ski now in our river and we live here. We are also very involved in the Variety Jet Ski Group, over 15 years, and they raise a lot of money for kids every year. There are good guys out there too that ride jet skis. We are also very concerned to see first-hand the dangers of what is currently happening in our river on jet skis with them water skiing in the ocean as they cannot use the river and also worried about the current regulations of jet skis not allowed past the point of Noosa Waters inlet, no 3.1.1 in the Noosa River Plan Draft as it seems to be discrimination. When these rules to ban jet skis originally came into the Noosa River Plan I understand to a point as the jet skis were two stroke, noisy and there are many residents on the river that may have complained. The current situation is very different as follows: For many years now the jet skis are four stroke and quieter than most boats on the river which means residents are not subject to heavy boat noises. Jet Skis also give less wake than most other watercrafts which helps save the banks of the river. Jet Skis have nothing on the bottom that can harm the sea and river life such as a motor on a boat than hangs into the water. (I recently witnessed a large turtle in the ocean with a broken back) The jet skis also give out less harmful omissions to the river which destroys life. Jet skis can access places that a lot of boats cannot which means they can save lives in shallow areas, get to residents homes easily as residents are restricted and have to sell their jet ski or drive to a boat ramp if they life on the river. Jet Ski owners should have the right to use the ski zone as does everyone else. Jet Ski owners not only have a boat license but also an added qualification, the jet ski license which means they are more qualified than a boat owner. Jet Ski owners are also subject to not be able to use the boat ramps in Hilton Esplanade and also at the Tewantin Marina. As I live on Hilton Tce I am forced to drive to the busy end of Noosaville at the boat ramp in which parking is far worse, more people, and more traffic. This is not right and as a resident we should have the right to use these two boat ramps. If I and many others could use these boat ramps, we could put our ski in and drop our cars off home as it is across the road, to save parks for others. How many will use jet ski area? Will there be too many jet skis in the ski zone. NO. The majority of jet skiers do not ski behind their ski and there is an expense to getting the ski equipment for this so there is no real issue in getting to many there but the ones that do should be able to take their family and friends and ski like everyone else as there is absolutely no reason why they should not. Education – River Plan – Jet Skis. It is great to see more of a presence on the water of regulation. There could more education in the dangers of the shallow river and bar area on jet skis in particular. Every week I see jet skiers flying over the shallow areas between Noosaville and the Noosa Bar and hold my breath especially when there are kids on board. These people have no idea of the dangers. There is definitely a major accident coming soon just from this lack of knowledge. Education may be more signage, brochures at the marine shops, etc., even information centres, online, in rooms. More discussion around this will save lives. Residents who live up the river need to either sell their jet ski or put it on a trailer, drive it to Noosaville to put in, park in one of the busiest tourist areas and spend a lot of wasted time and inconvenience. Does this make sense to you? I propose that we open the jet ski zone up to the ski zone and give back to the local their right to use the ski zone and the two extra boat ramps at Noosa Marina and Hilton Esplanade without judgement or discrimination. Our family and friends are all courteous and follow the rules like the majority of the jet ski owners. We have also saved many lives, people, kids, over turned boats in the Noosa Bar over these years with rips taking kids out and many people being thrown out of their boats. We also have educated people at the boat ramp and in the water on the rules of jet skis that are visiting as they are not aware of the rules. Only in the last couple of weeks I helped a young 12 year old get across the bar with his surfboard as he could not get back because of the current. Because I could go into the shallow water I could get to him. There are good guys on jet skis.

As a local Jet skier and passionate about our Noosa River this is important because this proposal can help save lives, injuries and keep a balance between water

craft rules and regulations as very rarely do we see any police to support us when idiots turn up and regularly with kids on the back.

	Jet skis are a common form of towing skiers and work well by leaving less wake and less noise than ski boats. Safety comes first, of course and anyone not doing the right think, like any water craft should be fined. Please do not discriminate the people who do the right thing.
	I propose that we open the jet ski zone up to the ski zone and give back to the local their right to use the ski zone and the two extra boat ramps without judgement. Thank you for your time.
Noosaville Business Association, Noosa	Noosa River Marine Zone - The plan describes the current regulation but fails to provide any assessment of the adequacy or suitability of those regulations.
Commercial Boatmans	<ul> <li>Action required by Council</li> <li>Comprehensively assess the results of the Noosa River Marine Zone in consultation with stakeholders.</li> </ul>
Association	- Identify gaps to be addressed in the river plans and/or future regulations.
Private	Join the 2 water ski runs together so make a larger ski run area
Private	Anchoring mooring and living on board  Abandoned and derelict vessels should be removed with a number posing a safety risk in high traffic areas.
	<ul> <li>Many vessels, particularly house boats that are lived on do not demonstrate any effluent waste disposal.</li> <li>Vessels along Hilton Esplanade and elsewhere are tied to trees with chains and ropes causing ringbarking and tree death.</li> </ul>
Private	Council needs to - Initiate identification and publish a list of unregistered moorings jetties and anchorages along the river Especially alone western end of Hilton Esplanade where many vessels are permanently anchored to trees and damaged vegetation, erode the banks and
	reduced the use of a public amenity for all.  - E.g. boats permanently moored on riverbank in front of 5 Hilton Esplanade have clogged up a previously well used swimming area due to their private use of this public area.
Private	I would like to see
	<ul> <li>less derelicts in the river</li> <li>to know for certain all the vessels which are lived on do in fact dump their human sewage in the appropriate sewage dump sites on the river.</li> </ul>
	<ul> <li>How is this policed?</li> <li>MSQ are not located in the river permanently to enforce this happen.</li> </ul>
Private	- All live aboards to pay for weekly pump out.
	<ul> <li>Boats unable to move or provide certificate to be removed.</li> <li>Treat as illegal camping.</li> </ul>
	<ul> <li>Hassle the existing authorities to actually use the powers they have to ensure the river is not abused.</li> <li>Provide and prominently display the telephone numbers and email addresses of the relevant policing authorities.</li> </ul>
Private	<ul> <li>The Live Aboard option in the river needs to be outlawed immediately.</li> <li>Live aboard users generate additional pollution in the river no matter how careful they operate and cannot be monitored 24 hours.</li> </ul>
	- Additionally they use council facilities without a rate payment which is unfair to the remainder of the Noosa rate payers.
	<ul> <li>The anchoring / mooring rules in the river are a disgrace.</li> <li>The MSQ are a worthless impotent group who had years to fix and police this issue but have done next to nothing.</li> </ul>
	<ul> <li>The council urgently need to take control of the mooring layout in the river and implement a world practice mooring system (with limited numbers).</li> <li>There have been threats for years to remove "mooring minder boats and derelict" boats from the river.</li> </ul>
	<ul> <li>The MSQ have again failed here, the council need to urgently take control, remove these eyesores and dangers to other river users.</li> <li>Overall here the Noosa council need to take all responsibility from the MSQ and to a lesser extent the AMSA for management of the Noosa River.</li> </ul>
	- The time is now to implement these changes Hope all the above is of assistance to the council and the future of the river.
Private	Noosa River does not need council intervention it's one of the healthiest waterways in SEQ.
	<ul> <li>Removal of abandoned and poorly maintained vessels</li> <li>Ensuring that moorings are appropriately utilised</li> </ul>
	- Ocean access are the only issues that could possibly need addressing.
Private	Promises must be kept.
Department of Transport and Main	I write in relation to the draft Noosa River Plan (the draft plan) that is currently open for consultation and thank you for the opportunity to provide comment.  Anchoring, mooring, living on the river
Roads - Director	- TMR, through Maritime Safety Queensland (MSQ), is the primary regulator and service provider with respect to marine safety and the prevention of ship-
General Nick Scales	sourced pollution in all Queensland waters, including the Noosa River.  - TMR delivers these services in cooperation with a range of agencies including local governments.
	- A number of the recommendations around anchorage, mooring and prevention of ship-sourced pollution indicated your preference for NC to manage these services.
	- I believe the Queensland Government should remain the primary service provider of marine safety, waterways management and ship-sourced pollution prevention activities. However, I welcome opportunities to develop broader partnerships to improve the delivery of these services.
	<ul> <li>Please note that TMR, largely through the activities of MSQ, has been more actively engaging with NC. This increased level of cooperation will continue.</li> <li>I believe initiatives such as MSQ recently improving its regulatory presence through the targeted activities of its marine enforcement team performing on-</li> </ul>
	water activities, is evidence of our commitment.  - This on-water presence on the Noosa River was welcomed by the community, and MSQ looks forward to conducting further patrols in the future.
	- Additionally, MSQ has created a new marine officer position, specifically tasked with identifying and responding to issues in the Noosa River, and engaging
	with relevant stakeholders to develop cooperative responses TMR looks forward to continuing to work with the NC in the future.
Private	<ul> <li>In favour of removing derelict or abandoned boats from the river NOT in favour of Noosa Council control of the river.</li> <li>In favour of minimizing the interference of the freedom of people in the Noosa Council.</li> </ul>
	- Greater accountability and transparency in financial spending of the Noosa Council.
	<ul> <li>Greater awareness of possible discriminatory considerations between river issues and land residential issues.</li> <li>Most important is to be more educationally oriented than control oriented.</li> </ul>
Private	I do NOT endorse Noosa Council taking control of the river.     I endorse strengthening partnerships with the current state government stewards.
	- Noosa Council already has stewardship over the lands adjoining the Noosa River.
	- There is already a great deal of improvement and maintenance needed to stop polluted runoff and revegetation and maintenance of Council and private land.  This is appeared of a workload without actual control of the river above the high tide mark.
D: :	- This is enough of a workload without actual control of the river above the high tide mark.
Private	- Renew the plan but keep council out of State and federal government areas under their control.

### Imposing further cost onto the Noosa rate payers is not required and or warranted. Private The Noosa River is Estate Government responsibility and that is how it should be. No changes in my opinion. Noosa Council, where are the future budget and expenditure forecasts? Private Noosa Council, can you convince the ratepayers we are not going to pay for this in the long run? Noosa Council, am I going to have to pay you each time I put my SUP in for a paddle, or my kayak, and how much extra for my boat that I already pay registration to the State Govt for? Noosa Council, are you going to make it impossible for existing businesses on the river to survive? Noosa Council, our river is a safe haven for vessels to shelter in time of a crisis such as a cyclone. Are you going to put restrictions on them? Noosa Council, you spent a lot of rate payer/ tax payer money on the Noosa River mouth dog beach. It's eroded again, this was an expensive exercise. How will you go managing the whole river??? Just leave in to the State Government! I am a rate payer and own a small Queensland registered boat kept on a Queensland Maritime Safety licensed mooring in Woods Bay. I support the overall aim of Private the Noosa River Plan but am concerned about The cost to ratepayers for the management of anchoring/mooring in the river under a user pays system. I understand that Council has advertised positions to manage the river use that will involve a cost of \$1m plus over five years which is not welcome as a ratepayer when the same river management results could be achieved under the current system by ensuring the relevant Agencies do their job. The Queensland Maritime Safety moorings are an easy target for user pays system revenue but there are only 112 of them and any useful recovery of costs would require marina level charges to be imposed (without marina level services). Collecting charges from the remaining anchored boats would not be easy because of their movements and the less easily available ownership details. Further, the great majority of boating on the river is shore based from ramps (subsidised by the State). These boats would escape user pays charges unless a ticket collector system was imposed and this is not practical. Additionally, the many boats based at residence jetties would not be charged for using the river. In summary the great majority of boats using the Noosa River would escape user pays charges and the cost of user pays would be borne by the few licensed mooring holders. My observation is that the majority of boats moored and anchored in the river are not super yachts and appear to owned by people of modest incomes. If Council wished to attract the high spending super yacht crowd the river mouth would have to be continuously dredged at high cost and marina facilities constructed like Mooloolaba. Both of these would be in conflict with the draft River Plan. I understand that a Woods Bay marina was not approved by the then Council some time ago for environmental reasons. While improvement of the current mooring and anchoring arrangements in the river is always possible, the current situation is not bad. Obviously deserted craft have been removed over recent years. I consider a more cost effective way to manage river use is to ensure the current Agencies do their jobs. The current presence of Agency personnel on the river during this holiday period is a good start. Council should have a formal role as a point of contact for reporting issues to Agencies and following up on action taken. This would not require the major investment in people and equipment involved in implementing a user pays system with consequent benefits for all rate payers. Q5. Boating Please consider the following additional comments to address specific actions proposed under Sustainable Use and Enjoyment. **Industry Association** Action 1. Continue to work with relevant State agencies to advocate for and support improved monitoring, compliance and enforcement of regulations on (BIA) the Noosa River. SUPPORTED. Action 2. Advance discussions with relevant State agencies regarding local management of anchoring, mooring, living on the river ... SUPPORTED IN PART. That is Council should liaise with Marine Safety Queensland (MSQ), as the latter is the appropriate authority to oversee management of anchoring, mooring and accommodation on boats. Recommendation: Instead of 'advancing' discussions for council to take over boating responsibilities, Council should support MSQ to develop a Noosa Regional Boating Plan which should be evidence-based and apply a Safe System approach i.e. safe people, safe vessels and safe waterways. It should encompass safe navigation (i.e. water traffic) and maritime infrastructure (i.e. access, storage and environmental facilities). Such a plan could well set a new benchmark in local waterway management for the State and Noosa could be used as the pilot for such a program that would deliver ongoing benefits Recommendation: Council should also support MSQ to establish a joint or shared maritime operational facility the area which could house other agencies with responsibilities for marine matters in and around Noosa e.g. Fisheries. This could only help lift the profile of safe and responsible boating and effectiveness of compliance in the area. Action 3. Development of an Anchoring, Mooring and Living on board Management Plan to identify how council intends to manage these activities. SUPPORTED BUT NOT MANAGED BY COUNCIL. MSQ should lead and deliver on this matter with support from Council for the similar reasons outlined under response outlined above. Recommendation: MSQ is the appropriate authority to manage these issues as in addition to its statutory responsibilities, the following is relevant. MSQ is under new leadership which has already moved to lift compliance on the river; and lift education regarding safe and responsible boating. BIA is working with MSQ on issues that include Dealing with wrecks, derelict, abandoned vessels state wide and looking at recycling and repurposing Dealing with sewage discharge from vessels Supporting a strategic approach to boating infrastructure Supporting a triple bottom line approach to ensure a proper balance and outcome for stakeholders Making boating accessible and safe Looking to the regulation, education and compliance model applied to anchoring, mooring and living aboard in other states such as NSW (where permanent living on board is basically prohibited). Recommendation: In the short term, Council should liaise with MSQ to have the latter apply a seaworthiness standard to new and existing vessels on moorings in the estuary. Vessels deemed to be unseaworthy should not be granted or reissued with a permit to moor and or be issued with a notice to remove. Recommendation: Council should also request MSQ to put in place a system of education/ warnings/ inspection/ compliance regarding pollution offences to any owners who have vessels moored or anchored that do not have holding tanks. Action 4. State endorsement of the Plans, and enter into a formalised agreement under relevant waterways legislation. NOT SUPPORTED. MSQ should lead and deliver on this matter with support from Council for the similar reasons outlined above. Action 5. A review of anchoring and mooring locations and types of moorings. SUPPORTED IN PART. That is, such a review should be carried out. However, MSQ is the appropriate organisation to lead on such matters as they hold responsibilities together with TMR for the statutory framework relating to boating. Action 6. Identification of a cap and locations for living on the river. SUPPORTED IN PART. That is, such a review should be carried out. However, MSQ should lead and deliver with support from Council for the similar reasons outlined under response to #2 and 3 Action 7. Effective monitoring and facilitation of waste tank effluent removal and disposal from vessels. SUPPORTED IN PART. That is, such a review should be carried out. However, MSQ should lead and deliver with support from Council for the similar reasons outlined under response to #2 and 3. Action 8. Advocate for removal of unsafe, abandoned and derelict vessels from the Noosa River. SUPPORTED BUT NOT TO BE MANAGED BY COUNCIL. MSQ should lead and deliver on this matter with support from Council for the similar reasons outlined under response to #2 and 3. Furthermore, MSQ is leading on the issue dubbed the "War on Wrecks" on behalf of the State Government and has \$20M in State funding to respond to this very issue. That includes the policy, strategy, capital and operational capability. Action 9. Investigate legislative amendments to control the 'length of stay' for anchoring. SUPPORTED BUT NOT TO BE MANAGED BY COUNCIL. MSQ should lead and deliver on this matter with support from Council for the similar reasons outlined under response to #2, 3 and 8. Action 10. Review of seasonal speed limit restrictions around Munna Point and Noosa Spit (Dog Beach) with Maritime Safety Queensland. SUPPORTED BUT NOT TO BE MANAGED BY COUNCIL. MSQ should lead and deliver on this matter with support from Council for the similar reasons outlined under response to #2 and 3.

- Action 11. Develop a comprehensive database of boat ramps and jetties and review current management of them in the river system. SUPPORTED. The outcome should inform liaison with MSQ and development of an evidence-based Noosa Regional Boating Plan by MSQ for the waterway.
- Action 12. Investigate a means of assessing the carrying capacity of the river in terms of marine infrastructure. SUPPORTED BUT NOT TO BE MANAGED BY COUNCIL. MSQ should lead and deliver on this matter in collaboration with DNRME and support from Council for the similar reasons outlined under response to #2 and 3. This work should be rolled into development by MSQ/ TMR of a Noosa Regional Boating Plan which is built on long-term data / evidence and is framed around a triple bottom line of Social, Economic and Environmental Benefits for the region. The Draft River Plan also makes statements about the influx and increase in boating on the river without any demonstrated evidence of data to support. Council must work with MSQ to develop a robust data capture system to deliver the robust, evidence-based decision making necessary prior to making any significant amends to boating activity.

### Noosa North Shore Association (NNSA)

Our Association has a constituency of residents and land owners - many of whom have properties that directly front the Noosa River - arguably the most in the shire on a permeant basis whose daily activity has a direct relationship with the river.

- As such, we have unique insights into the issues facing all as well as having a long-term historical understanding of both positives and negatives that impact our river and would therefore like to provide the following formal commentary and feedback on the Draft Noosa River Plan ver. 2.
- Firstly, we wish to reaffirm our original submission made in August of 2018.
- The underlying principle we have adopted is that we oppose separate management powers being given to Council from the State (and/or the Commonwealth).
- We strongly support the need for the State and its agencies to be given legislative powers where needed and that urgent priority be given to management of the issues raised in the Draft River Plan.
- It is extremely disappointing that many of the issues which have existed for a very long time require little to correct them and that simple prioritisation from the incumbent authority responsible would see marked improvement in many areas.
- For example, on P9 of the Draft it is stated..."Surveys of migratory shorebirds have revealed the Noosa River mouth, sandbanks and adjoining Noosa North Shore as an area of 'National and International Importance' for shorebird conservation in Australia. More than 50 species of shorebirds have been recorded, including many species protected under international agreements". On P27 it is stated 'To ensure Noosa's important shorebird habitats are protected from human disturbances, Council, under Local Law 4, established a 'beach closure' on the Noosa North Shore adjacent to the river mouth." Yet Council does not police nor manage its own local law. Over the past few weeks, today and in the past, despite a clearly visible sign stating 'No 4WD access', up to hundreds of 4WD's drive in that zone; park there and at times camp there with no fear repercussion for any authority. It is not a complicated matter to resolve.
- In summary, the NNSA Inc. recommends that every issue identified in the Draft be delegated and prioritised with the appropriate State Authority/Agency and that funding be provided and that legislative powers be given to manage and police them as a matter of urgent priority.

### Noosa Jetty Builders

### Anchoring

- The Plan makes various statements about the regularity of boats breaking free from moorings and causing damage.
- I know of few such incidents to warrant the alarm expressed in this Plan.
- Mechanisms and organisations already exist to respond in a marine incident.
- Council's involvement will not add value.
- The Plan makes inaccurate statements about the duration that vessels may anchor.
- Action required
- Take more practical action to enhance anchoring and safety in the Noosa River by ensuring:
- Navigation channel markers are improved and well lit.
- Marine Safety Queensland promotes preferred anchorages and highlights poorer holding areas.
- Mooring buoy locations are revised to widen the 'pinch point' adjacent to Hilton Terrace.
- Marine Safety Queensland and Coast Guard are given greater assistance (including insurance) when required to intervene with the occasional drifting vessel.
- Boat owners voluntarily register their details so they can be contacted if their (anchored) vessel drifts from its mooring or is involved in an incident.

# Moorings

- Low mooring fees are described as an "issue" without justification of why it is an issue or any data.
- It therefore appears to be an unsupported perception of Council staff.
- As above, I do not believe vessels regularly break moorings and cause damage.
- Action required
- Remove reference to "low fees" as an issue.
- Correct references to mooring breakages to refer to them as rare instances.

# Living on the river

- Council and Marine Safety Queensland already have powers to stop houseboats permanently mooring to shorelines to control liveaboards etc.
- Neither agency enforces these regulations unless a complaint is lodged.
- Both agencies are understood to claim lack of resources are the issue.
- I do not support Council's goal of taking control simply because MSQ and Council lacks sufficient resources to enforce those existing powers.
- I am aware of complaints being made about such houseboats and Council not acting on them.
- It is irrelevant that liveaboards use parks but do not pay rates as this analogy is applicable to every visitor to the region.
- Action required
- Council and Marine Safety Queensland to secure adequate funding to enforce existing regulations.
- Council to take a proactive approach to riverbank activities rather than wait for complaints.
- Council to address the illegal riverbank village that has been developed on the North Shore of the Frying Pan.
- Council to address the large number of illegal riverbank moorings adjacent to Hilton Terrace.

### Noosaville Business Association, Noosa Commercial Boatman's Association

Anchoring (as per comments above with changes or additions)

- The Plan makes various statements about the increased regularity of boats breaking free from moorings and causing damage.
- Our Association knows of few such incidents to warrant the alarm expressed in this Plan.
- Mechanisms and organisations already exist to respond in a marine incident.
- Council's involvement will not add value.
- The Plan makes inaccurate statements about the duration that vessels may anchor
- The Plan does not refer to Noosa Shire Council Subordinate Local Law No. 4.
- Council officers are currently seeking to apply this law to vessels casually anchored for a few hours as well as "stored" which contradicts international maritime regulations.
- The plan lacks any data to support statements in the Anchoring section and relies on perceptions to argue increased regulation and fees being charged.
- There are actually few instances of vessels breaking free of moorings and causing damage.
- Night navigation is risky because there is no lighting of any navigation beacons.
- The report fails to note that many of the older boats have no engine and are known to be uninsured.
- There is no obligation to register a vessel without an engine resulting in no third party insurance cover or current records of the owner or their contact details.
- The report objects to older and less attractive boats as the cause of issues when many modern, well maintained boats are anchored side by side with the older boats in the same waterway.
- The issues associated with cluttering and anchoring zones should not be generalised to older boats.
- The report notes opposition to new moorings but does not consider the cost / benefit of increasing moorings (or adopting a new mooring layout that increases capacity and safety) as a solution to the broader anchoring issues that are presented.
- Action required by Council
- The Plan should propose practical actions to enhance anchoring and safety in the Noosa River such as:
- Navigation channel markers are improved and well lit.
- Marine Safety Queensland promotes preferred anchorages and highlights poorer holding areas.

Designated channel is widened and mooring buoy locations revised to widen the navigation 'pinch point' adjacent to Hilton Terrace. Marine Safety Queensland and Coast Guard are given greater assistance (including insurance) when required to intervene with the occasional drifting vessel. Boat owners voluntarily register their details so they can be contacted if their (anchored) vessel drifts from its mooring or is involved in an incident. The Plan should ensure local laws are consistent with international maritime regulations and consistently understood and applied by Council officers. Ensure statements are suitably referenced with accurate data rather than outdated perceptions. Investigate the creation of a contact register to enable ease of communication with owners. Consider clearer designation of anchoring zones and the cost/benefit of new/additional/redesigned mooring zones and marinas to address current clutter. Consider strategies to enhance insurance cover of all vessels. Moorings Low mooring fees are described as an "issue" without justification of why it is an issue and appears to be an unsupported perception of Council staff. As above, we do not believe vessels regularly break moorings and cause damage. Action required Remove reference to "low fees" as an issue unless an explanation is provided. Correct references to mooring breakages to be based on actual data rather than perceptions. Living on the river Noosa Council and Marine Safety Queensland already have sufficient powers to stop houseboats permanently mooring to shore and to control liveaboards but do not act on them. We reject the need for further controls when current regulations are not even monitored or enforced. It is our understanding that neither agency enforces regulations unless a complaint is lodged. Both agencies are understood to claim lack of resources limits their ability to respond. As such, our Association does not support Council's goal of taking control simply because agencies do not allocate budgets to enforce existing regulations. We consider comments that liveaboards use parks but do not pay rates as irrelevant as this analogy applies to every visitor (tourist and/or visiting family member). We consider the task of investigating the relatively small number of boats being used as permanent liveaboards for sewerage discharge records to be a relatively small task. The numbers are only in the dozens and the boats are easily identified. We note the report fails to acknowledge there are liveaboards in Woods Bay and along Gympie Terrace, Hilton Terrace and beyond the Tewantin Marina. The report does not acknowledge international regulations for marine pollution. Actions required by Council Council and Marine Safety Queensland to cooperate and ensure adequate funding to enforce existing regulations. Council to take a proactive approach to riverbank activities rather than wait for complaints. Council to address the illegal riverbank village that has been developed on the North Shore of the Frying Pan. Council and MSQ to identify and address the small number of permanent liveaboards in relation to sewerage. Council to address the obvious permanent riverbank moorings between Mill Street and the Noosa Marina. Ensure the report is properly referencing all regulations. Noosa Jetty Visual impacts **Builders** The description of 'visual impacts' of older vessels is inappropriate and Council's ambition to set aesthetic standards should be amended to reflect State and Federal legislation. Action required Ensure any references are aligned to State and Federal legislation. **Noosaville Business** Visual impacts (as per comments above with changes or additions) Association, Noosa The description of 'visual impacts' of older vessels is inappropriate and simply asserts Council's ambition to set aesthetic standards. This should be amended to reflect State and Federal legislation. Commercial Boatman's There are actually only a few derelict boats and "mooring minders' in the Noosa River. Most boats are reasonably maintained and presented. Association The overall standard appears generally consistent with most anchorages and rivers in Australia. Action required by Council Ensure any references are aligned to State and Federal legislation. Remove personal perceptions that are not based on data or marine regulations. **Marine Infrastructure** I note that the draft plan makes several recommendations in relation to marine infrastructure management. Department of Transport and Main Several of these recommendations highlight the need for accurate data to inform future policies and projects. In 2017, TMR engaged a consultant to develop a series of forecasts for the future demand of recreational boating facilities. Roads – Director General Nick These forecasts are available online at www.tmr.qld.gov.au by clicking on (1) 'Projects', (2) Projects by name - R', Scales (3) 'Recreational Boating Facilities' and (4) 'Boating infrastructure projects and program - Recreational Boating Facilities Demand Forecasting Study 2017'. TMR looks forward to continuing to work with the NC in the future. Private Consider supporting the state government to build a new boat ramp near the Ferry on Moorindil Street to take pressure off high parking demand areas. There is high demand for additional boat launching ramps. Private Private Better access to the lakes should be an outcome, including walkways and boardwalks along Lake Doonella. The more connected to the waterway the more people are going to protect and understand its importance. This could be achieved along the north western end of Lake Doonella with a loop track and walking trail with minimal impacts (along existing unitywater infrastructure lines). **Queensland Parks** The Upper Noosa River catchment area within protected area is managed in accordance with national park management principles, ensuring riparian and Wildlife Service vegetation protection, sustainable use by visitors and environmental impact mitigation of existing and any proposed infrastructure. Within legislatively enshrined management principles, QPWS reserve the right to install, operate and maintain public recreational infrastructure including (QPWS) and Partnerships access jetties, campgrounds, toilet facilities and access trails. Department of **Environment and** Science Noosa Jetty Infrastructure **Builders** Plan notes that there is a high / growing demand for marine infrastructure but fails to comprehensively describe what infrastructure exists, usage, adequacy and/or issues associated with it. Outline what future infrastructure might be required, when and where. Distinguish between the infrastructure requirements of recreational users and commercial users. In the years Council staff have been rewriting this Plan, baseline research should have been completed to inform an infrastructure plan for inclusion in this

Plan makes multiple references to minimising vessel sewerage into the river but does not address the lack of adequate pump out stations (there is only 1

pump at the Tewantin Marina). Boats using it must moor outside the marina's lease. Council does not monitor usage. Plan makes little reference to the importance of availability and capacity of emergency services operating on the Noosa River.

Action required

- Plan should define and assess the reasonable infrastructure requirements of both recreational users and commercial users now and into the future.
- Specifically, the report should address known infrastructure issues including adequacy of boat ramps and associated parking
- Feasibility of dry rack storage facilities being installed to alleviate demand on ramps
- Development of a commercial ferry station / jetty at the Noosa Woods end of Hastings Street to replace the 'Sofitel jetty' which is a small, private jetty being used for commercial purposes in a narrow inlet that is regularly blocked when used
- Ensuring marine repair facilities meet requirements
- Ensuring adequate pump out stations
- Lighting all navigation markers throughout the river
- Ensuring marine facilities are flood proof
- Ensuring river mouth is navigable
- Ensuring adequate public jetties.
- Plan should assess options to increase availability and demand for pump out stations including providing them free of charge to maximise usage.
- Plan should assess the adequacy of emergency services and marine facilities to support them in terms of protecting users and environment in a marine incident.

### Noosaville Business Association, Noosa Commercial Boatman's

Association

Infrastructure (as per comments above with changes or additions)

- Plan describes the growing usage of the river but fails to adequately or comprehensively address marine infrastructure currently or future requirements including
- Does not comprehensively describe what infrastructure exists, usage, adequacy and/or issues associated with it.
- Outline what future infrastructure might be required, when and where based on factual assessments rather than biased political agendas to constrain capacity.
- Distinguish between the infrastructure requirements of recreational users and commercial users.
- Consider options for new or different locations of any infrastructure.
- In the four years Council staff have been writing this Plan, baseline research should have been completed to inform an infrastructure overlay for the river.
- Plan makes multiple references to minimising vessel sewerage into the river but does not address the lack of adequate pump out stations.
- Plan does not address Council waste treatment plants and their potential risks to associated waterways. In December 2019, Lions Park and Witta Circle areas were again displaying signage warning of sewerage leaks into the river. Council and business' sewerage infrastructure should be made foolproof.
- Plan gives little regard to the availability and capacity of emergency services operating on the Noosa River. Volunteer organisations have limited capacity.
- The Plan fails to adequately address current infrastructure and future requirements giving only passing mention to commercial and private jetties.
- A detailed infrastructure assessment and plan is required to account for essential economic infrastructure including
- Adequacy of public jetties
- Adequacy of boat ramps and associated parking
- Adequacy of ferry and charter boat terminals
- Adequacy of boat repair facilities / slipway infrastructure
- Adequacy of pump out facilities
- Adequacy of marina/s
- Potential for dry stack storage for vessels.
- Action required by Council
- Plan should define and assess the reasonable infrastructure requirements of both recreational and commercial users now and into the future.
- Specifically, the report should consider known infrastructure issues including
- Adequacy of boat ramps and associated parking
- Adequacy of commercial jetties, ferry terminals and charter boat facilities
- Adequacy of boat repair facilities / slipway infrastructure
- Adequacy of pump out facilities
- Adequacy of marina/s
- Potential for dry stack storage for vessels
- Lighting all navigation markers throughout the river
- Ensuring marine facilities are flood proof
- Ensuring river mouth is navigable
- Ensuring adequate public jetties (noting that some jetties are so high that they are unable to be used by boats)
- Community access to foreshores and river areas (eg. Wheelchair ramps, foreshore facilities etc).
- Plan should assess options to increase availability and demand for pump out stations including providing them free of charge to maximise usage.
- Plan should address risks associated with Council waste treatment plants and sewerage infrastructure that will result in pollution if breakdown or damaged.
- Plan should assess the adequacy of emergency services and marine facilities to support them in terms of protecting users and environment in a marine incident.
- Prepare a comprehensive infrastructure plan for the Noosa River to guide future decision making.

# Waste Water (page 48)

- Dot point 3 [page 49) states "Noosa Marina and the Noosa Yacht and Rowing Club has disposal facilities" and infers that these two sites provide adequate services for the river users.
- We note that Noosa Yacht Club's pump out facilities are however only for its members and may not be used by non-members as the Club does not have a commercial jetty.
- We also note that a vessel using the Noosa Marina's facilities will be moored outside the boundary of its commercial lease. Noosa Council is currently prosecuting Pelican Boat Hire for this practice.
- As such, the Plan should state that no legal pump out stations are available in the Noosa River and put forward a specific strategy to develop a public pump out station and other strategies to minimise sewerage releases from vessels in the river.
- Action required by Council
- Amend the report to note that the pump out stations are not available based on Council's own guidelines (seeking to restrict commercial activities to commercial jetties and ensure vessels using those facilities are moored completely within their lease boundary).
- As such, Council must commit to provide a public pump out station to ensure there is a legal and accessible solution to pump out sewerage from vessels.
- Consider alternatives to pump out stations such as a sewerage boat that visits moored vessels and takes their waste to a pump out station.

### Noosaville Business Association, Noosa Commercial Boatman's Association

# Recreational Boating

- The second paragraph notes that increased demand for infrastructure can affect user's enjoyment of the waterways however the draft river plan fails to assess current or future infrastructure requirements to manage and mitigate this problem.
- The plan fails to properly assess safety risks for recreational users or the lack of enforcement of existing powers.
- For example, a key safety risk affecting the river and its users is the number of unlicensed, unsupervised minors (often in unregistered vessels with fake horsepower stickers) with little knowledge of marine rules operating dangerously around swimmers and the river generally.
- Similarly, bridge jumpers and vessels travelling at night without lights are not recognised as significant risks which can be mitigated.
- Action required by Council
- Comprehensively assess infrastructure requirements.
- Comprehensively assess safety issues affecting recreational and commercial river users and propose strategies to mitigate those risks.
- Recent compliance blitz by MSQ in Dec '20 addressed the youths in unlicensed unregistered vessels with fake horsepower sticker. Refer MSQs overview of their blitz activity (email? media release?)

# Private

I'd like to see dredging in the river mouth

# Private

There needs to be a safer option to the existing moving and dangerous Noosa bar.

- In 1990's images the river mouth runs next to the northern breakwater.
- From experience this is how most world ports control their exit and entry to ports.
- It only required a dredging after an in depth study of long term sand movement.

#### Noosa Jetty Sediment build up linked to river's inability to flush (page 20) **Builders** Plan should address the importance of a navigable river mouth in terms of marine safety as well as water flows. Plan notes that sediment is largely created upriver and links commercial fishing as a significant contributor however gives no data on the scale of trawling activities which are understood to be minimal. Reference to motor boat traffic contributing to sediment in upriver areas is questionable given the lack of boat traffic on the river. Action required Plan should have a clear Objective to ensure the river mouth remains navigable year round to optimise the safety of recreational and commercial users. The extension of river walls and other infrastructure and strategies should be assessed to achieve the required outcome. Plan needs to provide reference data to support statements which otherwise appear to be based on loose perceptions. Noosa River Mouth The Plan does not provide an explanation for unforeseen erosion, an overview of the future forecasts or outline any strategies other than continue to monitor erosion. The River Plan should set clear objectives for the river mouth, particularly that it is provide a safe and navigable channel all year round. Action required Include a specific goal that the river mouth be maintained as a safe and navigable channel for all vessels. **Noosaville Business** Sediment build up linked to river's inability to flush (as per comments above with changes or additions) Association, Noosa Plan should address the importance of a navigable river mouth in terms of marine safety as well as water flows. Commercial Plan lists potential implications of climate change but does not provide an adequate assessment of associated risk or links to responsive strategies to respond or counter the implication. Boatman's Treatment is cursory and unbalanced compared to the assessment given to other topics. Association The plan gives a vague statement that "these interventions aim to increase the resilience of high-value habitats to stressors, maintain water quality and secure vital refuge for native wildlife, including aquatic life" however does not directly address or link to Council's other environmental strategies or climate change emergency plans etc. indicating a disjointed strategic framework. Plan notes that sediment is largely created upriver and links commercial fishing as a significant contributor however gives no data on the scale of trawling activities which are understood to be minimal. Reference to motor boat traffic contributing to sediment in upriver areas is questionable given the lack of boat traffic on the river. Actions required by Council Plan should have a clear Objective in relation to the river mouths navigability year round to optimise the safety of recreational and commercial users. The extension of river walls and other infrastructure and strategies should be properly assessed before Council assumes it is inappropriate. Expand assessment of impacts and strategies associated with climate change. Plan needs to provide reference data to support statements which otherwise appear to be based on loose perceptions. Noosa River mouth The Plan does not provide an explanation for unforeseen erosion, an overview of the future forecasts or outline any strategies other than continue to monitor erosion. The Plan does not acknowledge sand replenishment programs. The Shoreline Erosion Management Plan and/or intervention triggers need to be properly accounted for in the plan as they are potentially significant interventions in the foreseeable future. The River Plan does not acknowledge significant issues associated with constrained water flows associated with the river mouth congestion. The River Plan should set clear objectives for the river mouth, particularly its capacity to provide a safe and navigable channel all year round and what intervention triggers will be applied. Action required by Council Plan should state what is the goal for the river mouth in terms of whether it is to be maintained as a safe and navigable channel, maintenance of optimal water flows and extent of intervention that will be considered. Ensure the Plan marries to the Shoreline Erosion Management Plan. Noosa Jetty Lower estuary The Plan (Recreational Boating) incorrectly states that the lower estuary is the busiest part of the Noosa River during holiday periods. It is the busiest area **Builders** year round. The Plan (Recreational Boating) incorrectly infers that increase in use during peak holiday periods is by tourists when there is no data to support this statement. It is also the period when local residents use the river more often. Plan does not address human safety and social service issues such as kids jumping off Sofitel and Munna bridges, "river rats" sleeping under Munna Bridge etc. Plan does not address safety of vessels crossing the river mouth and the adequacy of emergency response. Action required Plan should remove casual perceptions unless based on data or evidence. Plan should assess risks to human safety and provide appropriate response strategies. Plan should ensure river mouth is navigable year round, that the channel is well publicised and that cctv is provided free-of-charge to inform boats of likely conditions when planning their crossing. **Noosaville Business** Lower estuary (as per comments above with changes or additions) Association, Noosa The Plan (Recreational Boating) incorrectly states that the lower estuary is the busiest part of the Noosa River during holiday periods. It is the busiest area all year round. Commercial Boatman's The Plan (Recreational Boating) incorrectly infers that increase in use during peak holiday periods is by tourists when there is no data to support this Association statement. Local residents use the river more often at this time as well. Plan does not address human safety and social service issues such as kids jumping off Sofitel and Munna bridges, "river rats" sleeping under Munna Bridge etc. Plan does not address safety of vessels crossing the river mouth and the adequacy of emergency response. Action required by Council Plan should remove casual perceptions unless based on data or evidence. Plan should comprehensively assess risks to human safety and provide appropriate response strategies. Plan should ensure river mouth navigability is well promoted with free-of-charge CCTV and current information to inform boats of likely conditions and safest routes when planning their crossing. Commerce Private I think that businesses that operate on the river need to provide information about how to look after the river whilst enjoying it. Just like a safety talk when you board a boat or hire a jet ski, there needs to be a brief talk about the rivers health and safety also.....nothing too lengthy, just a few minutes to make people aware of how to look after the river today while they are here to enjoy it. It's all education and I see it as a perfect opportunity to educate river users. Private I support some additional commercial dining/food/coffee use in specific river and beachfront locations such as Gympie Tce and Hasting St. Please consider the following additional comments to address specific actions proposed under Sustainable Use and Enjoyment. Objective #1 Q5. Boating **Industry Association** Action 13. Develop a MOU with DNRME to clarify and improve obligations related to ongoing management of commercial jetty leases. SUPPORTED. (BIA) Action 14. Review Noosa Council's Guidelines for the establishment of new businesses on the Noosa River and investigate other mechanisms to guide and manage commercial activity on the river. SUPPORTED IN PART. That is, Council should develop policy and guidelines relating to planning controls for businesses to the mean-high water mark (i.e., on land).

# - MSQ/ TMR must lead on policy and guidelines for commercial activity on the river, in partnership with AMSA as the latter holds the regulatory responsibility for domestic commercial vessels.

(For further information relating to the above refer page xx).

### Noosa North Shore Association (NNSA)

With regard to the latest draft we wish to draw to Council's attention

- A need to include in the State's management of new commercial operations not specially covered thus far.
- New technologies will see new forms of commercial and recreational uses.
- These will need to be caught as a principle under an umbrella of sorts.
- For example a recent business initiative on the river is electric powered surfboards.
- The operators have no commercial base and simple take bookings online and meet clients on the riverbank at Noosaville.
- There they take from 4-6 clients out on these surfboards and teach people how to use them in front of riverfront properties along Wygani Drive, Noosa North Shore.
- The operators use a jet ski for supervision.
- These boards are capable of speeds of greater than 20 knots and when used within close proximity of marine structures such as jetties pose a safety risk to inexperienced clients, children swimming and others.
- Furthermore when instructors continually shout instructions at clients, the calm and peaceful ambiance in the area is broken for 1 1.5 hours a session!
- A defined zone is needed for activity such as this.

#### Noosa Jetty Builders

#### Jetty leases

- The Plan continues to argue Council's political ambition for control over the commercial leases however does not describe a single significant issues associated with any jetty lease that warrants such intervention, cost and risk of legal appeal.
- Detail any community, environmental or economic benefits from such intervention.
- Properly describe the State's opposition to the move.
- Disclose that no leaseholder supports the proposal.
- Disclose that no leaseholder has been consulted.
- Disclose that Council is aware that legal challenges to such a takeover are likely.
- Council continues to operate in a confrontational manner with jetty leaseholders and has failed to act on previous suggestions of forming a Working Group to work cooperatively and positively.
- Action required
- While the Plan can describe Council's political and revenue raising ambitions, this Plan must transparently describe the many reasons why it cannot be achieved.
- The Plan should instead recommend that Council move away from its traditional adversarial model of operation and enter into a new, positive dialogue with commercial leaseholders and marine businesses to support the positive management of the river.
- Establish a River Management Committee to better advise the Mayor and Councillors.

### Noosaville Business Association, Noosa Commercial Boatman's Association

#### Jetty leases (as per comments above with changes or additions)

- The Plan continues to inappropriately argue Council's political ambition of control over the commercial leases however does not
- Describe a single issue or risk associated with any jetty lease or commercial operator that warrants such intervention or cost.
- Describe the legal obstacles and strong opposition from leaseholders who would need to agree to any assignment.
- Detail any community, environmental or economic benefits from such intervention.
- Describe the State's known opposition to the proposal.
- Disclose that no leaseholder has been openly consulted.
- To this end, we note that Council continues to operate in a confrontational manner with jetty leaseholders and has failed to act on our Association's previous suggestion of forming a Working Group to work cooperatively and positively.
- Action required by Council
- Amend the Plan to at least acknowledge the strong opposition and unlikely prospect of Council gaining control over Crown leases and the high risk of legal appeal if Council attempted to take over such leases.
- Establish a River Management Committee to better advise Council.
- This aligns to recommendations in the Noosa Fishing Futures (page 32-33) and best practice to work cooperatively with community and stakeholders.
- The Plan should recommend Council move away from its traditional adversarial model of working with river businesses and commercial leaseholders and enter into a new, positive dialogue to support the positive management of the river.

#### Noosa Jetty Builders

# New businesses

- The report states "The Noosa River is already congested during peak holiday periods and activity has reached a level where stringent control over new businesses is now required".
- There is no data to support this perception or description of any issues that substantiate this statement.
- Recreational vessels significantly exceed the number and impacts of commercial vessels operating on the Noosa River.
- There is no data to support the view that commercial vessels have greater impacts on the Noosa River than recreational vessels.
- As a commercial operator on the river in the construction industry I avoid to the best of my ability working in the river during peak periods primarily as a safety objective as my employees safety is first and foremost.
- That being said the biggest risk to the safety of our operators in unlicensed, unsupervised minors quite often in unregistered vessels having very little or no knowledge of marine rules, regulations or signage yet they are not mentioned.
- There is no data to support the suggestion that the volume of businesses requires "stringent control" particularly in light of no actual issues actually being described in the document.
- I consider it highly unlikely that Council is overwhelmed with business inquiries not least because Council approval is only required for food businesses or businesses wishing to operate from public land.
- A new business can legally commence operating from a commercial jetty without even informing Council.
- Council has no strategy to inform nor any mandate to assume it can control any business regardless of whether it is on land or water beyond existing legislation.
- In relation to Council's ambition to control and cap marine businesses, I note Council has no meaningful information on existing businesses, understanding of consumer demand for marine businesses on which to base any future strategy, strategy on which to assess or control anything let alone benefit the
- I reject the current Council's attempts to 'cap tourism' by seeking to control capacity, type and manner of operation of marine businesses that comply with State and Federal legislation.
- The report incorrectly states that Council approval may be required for subleases of commercial leases.
- Council is not a party to such leases and/or the approval of subleases.
- Council does not know what subleases or sub-tenancy agreements exist.
- The plan states that Council does not support Floating Shops but gives no basis for it nor regards its limited powers under State and Federal legislation.
- The plan states in several instances that boat ramps exist for <u>private</u> boat owners and may not be used by commercial vessels
- This is not correct.
- While marine businesses may not operate their business from those ramps, commercial vessels are equally entitled to use ramps.
- The plan states any vessel selling food must have a food business licence.
  This is incorrect as such is only required if they are processing food.
- Action required
- Amend any emotive and inaccurate statements.
- Ensure any critical statements are supported by evidence or data.
- Amend the Plan to ensure any Council ambitions are consistent with and do not contravene State and Federal legislation.
- Remove any actions from the Plan that are not directly and transparently linked to significant issues that have significant negative impacts.
- The Plan should instead recommend that Council move away from its traditional adversarial model of operation and enter into a new, positive dialogue with commercial leaseholders and marine businesses to support the positive management of the river.

Establish a River Management Committee to better advise the Mayor and Councillors. Ensure any update of the Guidelines for new businesses is prepared in consultation with community and existing businesses and not prepared in isolation by Council staff. Remove this reference. Ensure any reference to commercial leases is legally correct. Ensure references are legally correct. Moderate Council's aspirations so they do not contravene State and Federal legislation. Ensure references are correct. Moderate Council's aspirations so they do not contravene State and Federal legislation. Ensure references are legally correct. Moderate Council's aspirations so they do not contravene State and Federal legislation. Ensure there is no increase in regulation, red tape and bureaucracy which impacts negatively on new or existing small businesses. Noosaville Business New businesses (as per comments above with changes or additions) The report states "The Noosa River is already congested during peak holiday periods and activity has reached a level where stringent control over new Association, Noosa businesses is now required". Commercial No data is provided or known to be available, and no issues are put forward, to support this statement. Boatman's Recreational vessels significantly exceed the number and impacts of commercial vessels operating on the Noosa River. Association No data is provided or known to be available, and no issues are put forward, to support this statement. The report fails to describe a single issue affecting the river associated with marine businesses and inappropriately infers congestion is a result of marine businesses rather than recreational vessels. Recreational vessels significantly exceed the number of commercial vessels operating on the Noosa River. Council has no mandate or jurisdiction to control marine businesses outside of the existing legislation. We specifically note that Council has no meaningful information on the size, number of or types of existing businesses, understanding of consumer demand for marine businesses, any strategy to guide future decision making if it did have any control. To this end, our Association opposes the current Council's desire to 'cap tourism' and the marine services available to residents and visitors that enable them to experience the Noosa River. The report incorrectly states that Council approval may be required for subleases of commercial leases. Council is not a party to Crown leases and their approval is not required nor to any sub-tenancy agreements by that lessee. It is our understanding that Council has no data on what subleases or sub-tenancy agreements even exist. No data is provided to support the inference that Council is overwhelmed with inquiries for approval of marine businesses and our Association believes this suggestion to be unlikely and exaggerated. The plan states that Council does not support Floating Shops but does not provide a legal basis for the statement that floating shops cannot operate from a commercial jetty. Reasonable ancillary uses are allowable if primary use is a marine facility. The plan states in several instances that boat ramps exist for private boat owners and may not be used by commercial vessels. While marine businesses may not operate their business from those ramps, commercial vessels are equally entitled to use ramps. Action required by Council Ensure any statements that are critical of marine businesses are supported by evidence or data otherwise remove the statements. Amend the Plan to ensure Council ambitions are consistent with and do not propose to contravene State and Federal legislation and jurisdictions. Remove any actions from the Plan that are not directly and transparently linked to solving identified issues. The Plan should recommend that Council move away from its traditional adversarial model of operation and enter into a new, positive dialogue with commercial leaseholders and marine businesses to support the positive management of the river. Establish a River Management Committee to better advise the Mayor and Councillors. Ensure any update of the Guidelines for new businesses is prepared in consultation with community and industry and not prepared in isolation by Council Ensure the Plan corrects references to when Council approval is required or not for marine businesses operating from a commercial jetty. Provide data to substantiate claims of excessive demand for new businesses or remove the perceived exaggeration. Ensure future guidelines not that any reasonable ancillary uses are acceptable if the primary use is a marine facility. Ensure references to boat ramps and marine businesses are correct. THEME: WORKING TOGETHER I support that Kabi Kabi are included in the governance and ongoing management of the river catchment. Private Queensland Parks QPWS commend and support NSC's efforts to ensure best management of the Noosa River and catchment and welcome the opportunity to continue our and Wildlife Service collaborative relationship in achieving this end. (QPWS) and Partnerships -Department of **Environment and** Science Department of I write in relation to the draft Noosa River Plan (the draft plan) that is currently open for consultation and thank you for the opportunity to provide comment. Transport and Main I note Noosa Council's (NC) vision is that 'the Noosa River is recognised as the healthiest and most biodiverse system in South East Queensland'. Roads / Director The Department of Transport and Main Roads (TMR) supports your vision and will work with NC to achieve this vision to the greatest extent possible. General **Neil Scales** Working Together Noosa Jetty **Builders** The Plan (again) fails to acknowledge commercial operators, jetty leaseholders and marine businesses as key stakeholders in its development. I note Council did not respond to formal feedback on the 2018 draft plan and has not sought to consult with any commercial operator in the intervening 1.5 years ahead of issuing draft 2. I dispute Council's suggestion of wanting "genuine partnerships" as suggested on page 53. The Plan fails to present a meaningful schedule of consultation with community before the second draft is presented to Council. Any consultation should extend outside the peak holiday season which constrains the capacity of all businesses in the shire from responding adequately. I strongly oppose to Council rushing the second draft through when it is in caretaker mode and proposing radical steps ahead of an election. I strongly recommend Council extend the consultation until after the election. The 3rd paragraph (page 53) incorrectly states that the community feedback has initiated Council's push to control recreational use of the river. No data is provided to support this political ambition and the statement is strongly questioned by me. In contrast, I note however that there is a strong and concerted opposition to many aspects of Council's river plan and political ambitions to cap tourism and commercial capacity in the region. Action required Amend plan to acknowledge commercial operators as a significant stakeholder group that has not been actively consulted. Provide a written response to the feedback received to the 2018 draft plan as well as this submission. The Plan should instead recommend that Council move away from its traditional adversarial model of operation and enter into a new, positive dialogue with

commercial leaseholders and marine businesses to support the positive management of the river.

Establish a River Management Committee to better advise the Mayor and Councillors.

Extend the draft plan's consultation to after the election.

Correct this statement.

Working Together

**Noosaville Business** 

Association, Noosa

### Boatman's despite their economic significant, cultural and recreational importance and role as major employers. Council did not respond to any of the feedback provided by our Association on the 2018 draft plan. Association Council has not sought to consult with any commercial operator or our Association in the intervening 1.5 years since the first draft. Based on this experience, our Association disputes Council's suggestion that it wants "genuine partnerships' as suggested on page 56. Page 56 second and fourth dot points state that there have been forums with local community and environment organisations and broad public consultation through to 2019 however our association and members are unaware of any single event, activity or opportunity since the first draft closed in mid-2018. Draft 2 of the plan is now being circulated for comments in a compressed timeframe and during the peak holiday period which indicates Council has no appetite for genuine consultation or feedback on its plan. We believe these decisions contradict and contravene the plan's own Objective 1 (page 56) that the "Noosa community is genuinely engaged and involved in the management of the Noosa River." We are strongly opposed to Council rushing the second draft through when it is about to enter caretaker mode when radical steps are proposed and major flaws in the plan need to be addressed. We strongly recommend Council extend the consultation until after the election. The 3rd paragraph incorrectly states that the community feedback has initiated Council's push to control recreational use of the river. No data is provided to support what our Association considers to be a purely political ambition. Our Association strongly opposes Council claiming any mandate or jurisdiction to restrict or control recreational users. In contrast, we note however that there is a strong and concerted opposition to many aspects of Council's river plan and political ambitions to cap tourism and commercial capacity in the region. Action required by Council Amend plan to acknowledge commercial operators as a significant stakeholder group that has not been actively consulted with to date. Provide a written response to the Noosa Commercial Boatman's Association feedback to the 2018 draft plan as well as its response to this submission. The Plan should recommend Council move away from its traditional adversarial model of operation and enter into a new, positive dialogue with commercial leaseholders and marine businesses to support the positive management of the river. Establish a River Management Committee to better advise the Mayor, Councillors and management on the long term planning and management of the Noosa River. Extend the draft plan's consultation to after the election to ensure meaningful and adequate consultation. Provide data to substantiate this statement or remove it. Ensure all statements and strategies abide by existing State and Federal legislation rather than Council's political ambitions. Establish a River Management Committee and commit to active and open consultation with all stakeholders responsible for the river's health. DRAFT RIVER PLAN (document structure, content, approach etc.) It is an impressive document to me because of the focus on collaborative effort. The Draft Noosa River Plan is extensive without being unreasonable. It seems Private possible to achieve the goals in the action plan. I would like to see access to the Noosa River Plan available on the council web site for everyone to be able to access. I cannot go to the council chambers for Private viewing. **NICA** NICA applauds the overall ambition, scope and initiatives of the River Plan and looks forward to participating and supporting Council in its implementation subject to final approval and adoption. Nevertheless, NICA specifically notes the following as areas that may require additional clarity or consideration The proposed water monitoring program remains undefined in scope, distribution and key measurement parameters. NICA looks forward to working with Council to designing and implementing this program. Management of riparian areas adjacent to the Noosa River system should ideally encompass "whole of catchment" principles including specific program initiatives to identify, monitor, and where necessary, rehabilitate, key areas of seagrass, mangrove, saltmarsh and adjacent habitat. These works will complement existing in-river and upstream initiatives undertaken in the BBF project. The enhanced Council (and presumably other stakeholder) attention on compliance of existing regulations is welcome and overdue, though note these measurements are only effective if enforced regularly and in combination with education programs to encourage behaviour change. NICA amongst other organisations would design and implement community education programs in parallel with these initiatives in addition to notifying Council of absences in compliance where necessary. NICA notes the continuing lack of consideration of the Noosa River as part of an integrated transport solution linking to existing terrestrial networks. Whilst NICA acknowledges it is not the role of Council to provide point-to-point on-water transport links, both the River Plan and Transport Strategy remain silent on this issue. Thoughtful consideration of how Council can assist river-based commercial operators devise solutions to Noosa's chronic peak transport issues including the use of Council infrastructure would be welcome. NICA Notes under the "Working Together" section that Council intends to support community groups assisting in the implementation of various initiatives of the proposed River Plan. Nevertheless, the Plan lacks clarity on which initiatives community groups can assist Council in implementing along with provision of funding for same. As the only community organisation directly committed to the sustainable use and conservation of the Noosa River Catchment, NICA looks forward to working with Noosa Council across new and ongoing programs and initiatives of the River Plan to ensure its every success. Noosa Parks Version 2 is a considerable improvement to version 1. At least it now has a recognisable logic. And it is a good enough attempt to bear the Noosa Council logo, Association which V1 was not. However it lacks a strong stretch strategic vision, choosing instead one that is the status quo: "Our vision is that the Noosa River is recognised as the healthiest and most biodiverse system in South East Queensland". This failure of vision causes the rest of the plan to unravel toward a rather timid list of actions. Disappointingly, there is more than a little Noosa Council preening about its prior track record in Noosa River planning and protection, but no acknowledgement of Noosa Council's track record in being the principal destroyer of the Noosa River estuary's ecological flows, marine habitat, and Perhaps unsurprisingly, at the action end of Version 2, there is little more than vague rhetoric on lower estuary restoration. Using river health and biodiversity, sustainable use, and working together as major themes makes The V2 superior to V1. Sticking to these themes in the same order in each section of the plan would improve it further. And using them to structure the risk assessment matrices would lead to more credible matrices than those in V2, which appear to have been reverse engineered from the action list. Despite the above misgivings, Noosa Parks Association congratulates and thanks Noosa Council for producing Noosa River Plan V2. It's the first Noosa River Plan ever produced by Noosa Council that NPA has been able to endorse. With regard to the Oyster Reef Habitat section we find the opening paragraph very misleading and inaccurate. Noosa North Shore Association (NNSA) It is stated ..."In the Noosa River system oyster reefs that were once plentiful, became commercially and functionally extinct by the 1940s as a result of intensive dredging of oyster lease areas and the removal of live oyster beds and the underlying bedrock (Thurston 2015). As a consequence, large areas of intertidal and subtidal 'hard substrates' required for oyster spat to settle, grow and form reefs, were lost. There is ample empire evidence and consensus amongst expert scientists that this is a false statement. We have to remember that back around the turn of the 20th century, there were essentially 2 types of oyster stocks – oyster banks and dredge oysters. The oyster banks reported in Hansard indicate that they were in 50 acre lease sites in shallow tidal areas such as Lake Weyba, whereas dredge oysters were found in isolated areas where solid formations such as rocks and hard river bottom is found. The actual 'size' of naturally formed oysters in the river was not immense as portrayed by Council's selective excerpts from Dr. Thurstan's report. The facts are that the rock oyster industry in southern Queensland peaked in 1891 producing around 21,000 sacks (at 90 kg per sack = around 1890 tonnes; Smith 1981; Lergessner 2006; Diggles 2013). Smith (1981) noted that around 80% of the production at this time was generated by oyster banks, while dredge oysters comprised only about 20% of the harvest after the dredge sections were damaged by the floods of 1887, 1889 and 1890. Even though production dwindled from that time onwards, during the decade 1901-10 the industry reached its peak for the number of men employed, banks and sections leased, and boats licensed (Smith 1981). For example, the total number of dredge sections in Queensland reached an all-time high in 1904 with 64 leased, but from then on there was a gradual decline.

The Plan fails to acknowledge commercial operators, jetty leaseholders and marine businesses as key stakeholders in relation to "Working Together"

Commercial

- According to Glen S. Smith 'Southern Queensland Oyster Industry" 22/10/1981, by 1936 Queensland itself was importing New South Wales oysters, a situation that still continues.' Along with the effects of mud worm disease, this rise of the New South Wales industry was the major contributor to the decline of Queensland's industry.
- Furthermore, the 'positive research results 'spin' for the oyster trial borders upon deception. Results have been positioned as convincing. The reality was that the 12 month oyster trial showed 60% of bags had a decline in insert spat and 40% of oyster necklaces had no data or showed a decline. None of the bags solidified and silt is a major concern. The 'positive' result was achieved by growth of larger, fewer oysters on fewer bags to achieve an overall result. Given that Council cut short the test by 2 years and results are very much inconclusive and it is from any scientific standpoint misleading to use the results data the way in which it has been.
- The entire Oyster reef section and all future public communication should be rewritten accordingly to accurately state the facts.

### Department of Environment and Science (DES) – Environment Policy and Planning

Thank you for the opportunity to provide feedback on the Draft Noosa River Plan. As an aquatic ecologist, I am pleased to see the value placed on headwaters and tributaries, and the recognition of priority areas outlined in Map 5. From a management perspective, this is highly useful. Overall I think this is a comprehensive report, and a good prioritisation of the key environmental issues and actions required for the region. Page specific comments:

- Page 13: Objectives 2 and 3 will require extensive and ongoing water quality monitoring (including base and event monitoring of nutrients, pesticides and sediments. This currently does not occur in the freshwaters of the Noosa Catchment. This should be included in more detail in the Action Table on page 61, and the monitoring and Evaluation Table on page 66. See further comments below.
- Page 24: (Benthic biodiversity) Refers to proposed actions as part of this report, however does not include the sections of the report where these are included. If the sections/ titles/sub-titles of this document were numbered (see suggestion below) this could be used to guide the reader as to where these proposed actions are within the report.
- Page 29: suggest including 4WD regulation in threat mitigation.
- Page 30-31: requires water quality monitoring post implementation of remedial works and best management practices. (also relevant to the Action Plan table on page 61)
- Page 38: Monitoring and identification of the source of nutrients influencing blooms of Hincksia is suggested in the report, but this is not included in the Action Plan table on page 62.
- Page 51-52: No mention of seagrass damage and turbidity / re-suspension of sediments from the T5 trawling. (Note we have received letters of concern from the public regarding this).
- Page 61: "development an integrated water monitoring program.....including event monitoring of sediments, nutrients, and litter for the Noosa catchment". To achieve the key objectives outlined on page 13, this should be an ongoing program rather than short term. In addition, Healthy Land and Water no longer monitoring these water quality parameters in freshwater, so local council would need to develop a long term water quality monitoring program to achieve these objectives. This is especially important for the Kin Kin region where limited comprehensive water quality data exists, despite the known rural runoff issues (listed on page 30). Finally, it is essential that this data is of adequate quality (following the methods outlined in the QLD government Monitoring and Sampling Manual <a href="https://environment.des.qld.gov.au/">https://environment.des.qld.gov.au/</a> data/assets/pdf\_file/0031/89914/monitoring-sampling-manual-2018.pdf) so that data may be compared to current water quality objectives for the region. A citizen-science based program will only be useful to inform management if the data is obtained using these methods.
- Page 66: Monitoring and evaluation table. This should also include a target for improved water quality (especially in Kin Kin and other rural areas) with ongoing monitoring for sediments and nutrients as per the key objectives on page 13.

### Department of Environment and Science – Marine Protected Area Policy, Strategy and Investment

#### Sustainable use and enjoyment

- The Department of Environment and Science (DES) notes the addition of the program / initiative to establish a marine protected area in the Noosa area which was not included in version 1 of The Noosa River Plan.
- Also noted is that there is no timeframe associated with the completion of this objective.
- This objective would require extensive consultation with the DES.
- The Great Sandy Straits is referred to in objective 3 as a marine protected area but the marine park covers a much larger area than that and is the Great Sandy Marine Park.

# Private

I am a recreational user of the Noosa River and I have some concerns about the Noosa River Plan Draft 2. My concerns relate to:

- The omission of 'community well-being' in the Noosa River plan Draft 2 in its Vision Statement.

  I was sitting in Noosa Chambers (public) when the recommendation was made to take 'community- well-being' out of the Vision Statement. It is my opinion that the Councillors may not have understood the 'unintended' consequences of this change.
  - I do not believe any legal opinion was sought.

    "Public health researchers Wiseman and Brasher definition: Community wellbeing is the combination of social, economic, environmental, cultural, and
- political conditions identified by individuals and their communities as essential for them to flourish and fulfil their potential."

   Community Consultation period during a peak tourism period is neither appropriate nor reasonable.
- I am concerned that residents and stakeholders have not been given adequate time to seek expert advice or understand the changes as many are away or working during the busiest few weeks of the year.

# I therefore ask that Council:

- Reinstate or at least seek legal opinion on the term 'Community Wellbeing' in its Vision Statement and
- Extend the immediate consultation deadline of 13 January 2020 to allow fair and proper community feedback.

### Noosa Jetty Builders

I am a fourth generation resident who owns and has been operating a business primarily from Noosa's waterways for over 19 years this in combination gives me an intimate knowledge of the waterways workings, movements and ISSUES. I have watched the area grow and through this growth came an increase in the recreational users on our once quiet waterway. I welcome the development of a Noosa River Plan to ensure the river is managed and used safely, sustainably and positively but DO NOT believe draft 2 is adequate or complete and call for:

- Issues highlighted in this submission, and any other public feedback should be formally addressed before the plan is adopted.
- Community consultation should extend beyond the peak holiday season to allow businesses, the local community and visitors alike sufficient time to engage with the plan.
- As the plan has been on and off the drawing board for nearly 4 years, it creates suspicion that the current sitting members of Council are trying to rush the adoption of this flawed plan through political desperation.
- There has been no meaningful or recent consultation with major stakeholders such as the marine and tourism industries.
- As the owner and operator of one of the only construction and maintenance businesses on the river I have not been contacted or consulted regarding any drafts of the Noosa River Plan.
- Any decisions on this plan should be deferred until sufficient consultation, studies (that provide accurate, relatable data), solution with reasonable completion dates that have measurable and defendable outcomes have been carried out and developed. This will ensure that the 2030 target date is achievable.
- Inclusion of meetings and discussions with State Government departments to ascertain the likelihood of them ceding powers to Council.
- Consult with the Gold Coast Waterways Authority which was established in 2012 for advice on how they approached and developed their plan/strategy and how it was adopted. Their Waterways Management Plan is a four year rolling investment plan that is updated and published annually. It is also funded by a portion of the \$120 million state wide marine infrastructure fund. It should also be noted that even though the Gold Coast Waterways Authority was established they still have limited authority and the State Government departments still maintained theirs.
- Consideration to the development of a Noosa Waterways committee or authority be established to assist and advise in the development and implementation of a Noosa River Plan / Strategy that is beneficial to the community as a whole.
- I welcome the opportunity to meet with Councillors and Council staff to discuss these issues in full so they can be properly accounted for in future revisions. For additional comments on draft plan refer below-
- Vision
   The published vision has been amended to remove reference to "the greatest possible community wellbeing now and into the future" and Councillors have adopted a vision limited only to "the healthiest and most biodiverse system in South East Queensland".
  - This vision is inappropriately limited and lacks appropriate regard for social, cultural, historical and economic factors that are essential and appropriate factors in the long-term stewardship of the river and the Shire generally.

- The unilateral raising of environment above all other factors fails to meet the Council's own objectives of its 2018 Corporate Plan specifically Theme 3 to support an economy that is diverse and resilient and with a sustainable tourism sector.
- This amendment may create an inappropriate mechanism for future Councillors to ignore non-environmental factors including indigenous history, social inclusion, industry and community amenity when it balances decisions against environmental factors.
- Action required
- Revise the vision to ensure it accounts for factors such as community wellbeing as previously proposed.
- Provide clear and measurable performance indicators that address all community wellbeing factors.
- Ensure the Noosa River Plan's Vision is aligned to all the themes of Council's Corporate Plan and not singularly limited to Environment.
- Council should form a River Management Advisory Group to help guide its policy direction.

#### Legal Mandate

- Council proposes to take various actions without a legal mandate and in contravention of State and Federal legislation.
- The Plan variously proposes Council taking on compliance and enforcement of responsibilities over issues such as mooring, waste disposal, safety etc.
- Current State and Federal legislation excludes Council from having authority or mandate to "take control of the river" as variously proposed in the Plan.
- While various suggestions are made that Council needs to negotiate such powers, it cannot put forward actions to 'take control' until such time as legal processes are resolved.
- River users cannot be subjected to Council harassment and attempts to enforce compliance if Council has no authority.
- Council has long advocated taking 'control of the river' but is no closer to gaining the required authority or mandate.
- The draft River Plan (and a large number of actions within it) should not be premised on Council's unachievable aspiration to takeover powers that will not be ceded to it.
- Action required
- Plan should be restructured to:
- Ensure any actions align to existing legislative powers.
- Develop a partnering approach with key agencies to increase resources allocated to the Noosa River so compliance and environmental goals can be better achieved (rather than seeking to do it all by Council).
- Direct Council staff to consult with community and industry on the application of State and federal legislation to better inform any future references in subsequent draft plans.
- If Plan recommends any takeover of powers, the Implementation Plan must set out the process, timetable and communication plan for stakeholders.

#### Lack of Strategic Options

- The Plan argues for "taking control of the river" without addressing options or alternatives to achieve desired outcomes.
- Plan needs to be restructured to ensure any issue that is described is substantiated with data, assessed, prioritised and specifically mapped to action plans/actions that will address it.

### Actions put forward do not properly align to or respond to key issues

- The plan describes "issues" based on personal perceptions and appear to lack data or evidence to support such observations or their declaration as "issues" which need to be addressed (e.g. Houseboats regularly breaking free and causing damage; increased boat traffic during holidays being a bad thing; safety is compromised without referring to any data on marine incidents etc.).
- The plan gives inadequate consideration of the relative priority of issues, their seriousness or their impacts.
- The plan fails to describe some issues at all before recommending actions.
- In particular, the Plan makes multiple recommendations about taking control of commercial businesses and leases but does not describe any issues associated with those businesses, does not associate any negative impacts created by them, does not refer to any significant legislative breach by any of them nor put forward any reasoned argument for seeking to take such action.
- Action required
- Plan should delete any actions that cannot be linked to a significant issue which are otherwise seen as peripheral and unnecessary.
- Plan should demonstrate consultation with responsible State and Federal agencies in relation to safety, compliance and risk before making ill-informed assessments without data or reference.

# Plan needs to define the scope of waterways actually being addressed (page 5)

- Plan defines its scope as "Noosa's freshwater creeks, wetlands, lakes, river estuary, coastal creeks and groundwater and incorporates a whole of catchment management approach".
- The Plan however variously discusses the Noosa River and Noosa Waterways but extends into making arbitrary recommendations for singular matters relating to North Shore beaches and a single recommendation for Laguna Bay.
- Plan does not address broader issues associated with Laguna Bay, southern beaches, river mouth or any local coastal or offshore waters.
- The Plan fails to comprehensively assess sub-zones within the river such as lakes or urban areas or provide specific responses to zone issues (e.g. Sediment runoff from North Shore's dirt roads adjacent to river).
- Plan does not address broader issues with pollution, infrastructure and management of the coastal and marine issues and only selectively chooses a few for reference.
- The current piecemeal approach is considered inadequate in scope nor properly consulted with key marine environmental reference and research groups.
- Action required
- Plan needs a defined scope as to whether it is referring to inland/upriver waterways or all river and ocean areas.
- Plan then needs to be revised to align its scope (e.g. If it is only addressing upriver areas, then it should delete ocean references.
- If it is addressing upriver and ocean issues, then it needs significant additional work rather than the current piecemeal approach to selective species and
- Plan should comprehensively assess and profile each major region in the river to provide strategies and actions that are properly responsive to each region's individual issues.
- Plan should either include or exclude all coastal areas rather than refer to selective issues on selective beaches.

# Actions not related to issues

- The first draft of the Plan (page 7) stated that the river was under pressure from many sources including recreational users and environmental impacts but did not attribute a single issue to commercial operators.
- The second draft similarly does not attribute a single issue or environmental impact from commercial operators however the report continues the inappropriate targeting and controlling of commercial operators.
- Action required
- Council should ensure any actions are directly linked to clearly identified/and prioritised issues.
- It should not include vague political agendas in the plan if they are not causally linked to an actual issue that has a significant negative impact on the Noosa River.

# Marine knowledge and experience

- Plan makes various references to marine safety and marine infrastructure however appear to lack proper referencing to existing legislation, agency responsibility or appropriate marine qualification.
- Many statements appear to be personal opinions and lack baseline data (eg. Boats regularly break free of their moorings and damage infrastructure) or understanding of marine regulations (eg. Duration for anchoring).
- Plan appears to be a desktop study and has no reference to baseline data for marine incidents.
- To our knowledge, Council staff/authors do not have any marine qualifications and/or on-river experience.
- Action required
- Report needs to be peer reviewed by marine industry experts.
- Report needs to be peer reviewed by State and Federal agencies before further considered by Council (noting it would be inappropriate for Council to approve a plan with actions that are potentially illegal).
- Report needs to be edited to remove personal perceptions and unsupported anecdotes and linked to appropriate baseline data.
- Report needs to engage with industry in relation to marine infrastructure issues and strategies.

# Implementation Plan

- To be effective, Objectives need to be specific, measurable and have a completion date.
  - Most actions lack a completion date and are inappropriately vague which makes them unaccountable.
  - Actions listed as for completion by 2030 need to have sub-actions with earlier completion dates so progress can be tracked.

- Action required
- Revise the Implementation Plan to provide more specific, measurable actions with clear completion dates.

#### Users

- The report makes inappropriate and subjective distinctions between residents and visitors (e.g. Objective 2 Residents and Visitors are compliant ....") without reference to any data or baseline data to infer either group causes different impacts or warrants different approaches.
- Council has no data that would enable them to differentiate between residents and visitors using the river.
- Marine regulations apply equally to all users.
- Action required by Council
- Remove inappropriate distinctions between residents and visitors.

### Message from the Mayor (page 4)

- Accolades to environmental activists being the exclusive protectors of the river are inappropriately dismissive of the community and industry's efforts over decades.
- The Mayor's accolades for the Noosa Parks Association represent a direct conflict of interest given his personal relationship and past book commissions.
- Our members have operated continuously on the Noosa River for 70 years and are significant stakeholders who have contributed to the river system's success and sustainability.
- The broader community are significant contributors to the river system's success and sustainability.
- Action required
- Rewrite the Mayor's Message to respect the many stakeholders that have contributed and continue to contribute as stewards of the river on a daily basis.

#### Errors (page 31)

- Spelling errors
- Action required
- Correct spelling errors with NICA and Sea Shepherd

### Hincksia (page 34)

- Hincksia research is 2006.
- Action required
- Plan should reference more recent research.

### Pithy political statements

- There is no evidence or data to support the statement that ceding control of the river to Council will "encourage a welcoming, friendly boating community which supports visitors as well as the expectation of residents".
- To date, Council has shown no intent to manage the river in a consultative manner or to work cooperatively with the "boating community."
- Action required by Council
- Amend the Plan to either remove pithy political statements.
- Reinstate community wellbeing to the Vision.
- Include community engagement and stakeholder satisfaction as a Measurable Outcome.

#### Jetty leases (page 43)

- The Plan should be revised to ensure the last two paragraphs are related to the heading and should be separated to a section relating to community use of the foreshore.
- Action required
- Restructure this section.

### Implementation Plan (page 60)

- Sustainable Use & Enjoyment Objective 1
- Action required
- Plan needs to first report on how it can take over State and Federal obligations and a basis for this waterway being treated uniquely to any other waterway in Australia.
- Plan should have a target for ensuring adequate resources for State agencies responsible for marine compliance.
- Plan should state what it will do after it develops a database that identifies unapproved river structures and jetties.

#### Noosaville Business Association

The Noosaville Business Association is pleased to see the development of a Noosa River Plan is underway, and supports the objective of ensuring the river is managed and used safely, sustainably and positively.

- For the purposes of this submission we would like to clearly state that when referencing the business community, the majority of business owners are also residents of the Noosa Shire. There should not be a distinction made between a resident and a business owner in the Noosa Shire.
- The Noosaville Business Association represents a large cross section of industries operating in the Noosa Shire, many of which either operate on the Noosa River or provide services to those that operate on the Noosa River. These businesses are all major employers in the region and with their staff and families, and all rely on the river being well managed from a safety and health perspective.
- Our members help residents, visitors, tourists and other businesses to experience and operate on the Noosa River. They assist people of every demographic group who use the available services and facilities to experience the Noosa River and Noosa's natural environment in a safe and positive way.
- The Noosaville Business Association strongly believes that the time provided for public consultation on the draft plan is unreasonably short, and unfair given that December and January peak holiday season.
- Many residents and businesses are overwhelmingly busy during this period, which has left them with next to no time to understand the draft document and make appropriate comment.
- Upon review the Noosaville Business Association strongly believes that the version 2 draft of the plan needs much more work, consultation with the public and other stakeholders, and is not adequate in its current state to achieve the desired community objectives.
- Proposed Way Forward
- Issues highlighted in this submission, our prior submission and other public feedback to be formally and openly addressed so the approved plan is sufficient.
- The public consultation period be extended to allow businesses and community sufficient time to understand and respond to the draft plan.
- The plan has been in the making for next to 4 years, which would indicate there is no reason to rush through such an important plan affecting the Noosa Shire.
- Significant changes are needed to the draft plan which will require further public consultation in accordance with the Local Government Act. (please refer to the attached addendum of issues and suggested action from the Noosa Commercial
- Boatman's Association, which is fully supported by the Noosaville Business Association).
- More consultation with the community by forming a suitable committee to provide input and expertise into the river's management plan and ongoing programs.
- Our understanding is that there has been no meaningful consultation with any major stakeholders in recent weeks or months.
- We welcome the opportunity to meet with Noosa Councillors and Noosa Council staff to discuss this submission in more detail. We hereby ask the Noosa
  Council to ensure the Noosa River Plan is a comprehensive document that will adequately protect the value of Noosa River and continue to provide an
  important precinct for the entire community.

### Noosa Commercial Boatman's Association

The Noosa Commercial Boatman's Association represents the marine tourism and related industries operating in the Noosa Shire. Our members' businesses have operated continuously on the Noosa River for over 70 years with marine industries dating back to Noosa's earliest industry.

- Our members represent some of Noosa's oldest businesses including charter boat operators, commercial jetty / boat hire operators, tourism companies, transport companies, marine repair and service business, construction businesses, fuel suppliers, consumer goods suppliers, retailers and hospitality businesses who work on and around the iconic Noosa River.
- We are major employers in the region and with our staff and their families, we have a vested interested in a safe and healthy river.
- Our members are also individuals who use the Noosa River on a daily basis. We are recreational boaties, paddlers, surfers, environmentalists, sailors and families who get wet in the river more than nearly anyone. We live on, work on and navigate it daily and bring an intimate knowledge of its workings, its movements and its issues to this response.
- Our members help residents, visitors, tourists and other businesses to experience and operate on the Noosa River. We assist people of every demographic group who use our services and facilities to experience the Noosa River and Noosa's natural environment in a safe and positive way.

- Our Association believes the time available to consult on the draft plan is inappropriately short and disappointed its own response has been curtailed to match the timeframe available and the constraints of the peak holiday season.

The Noosa Commercial Boatman's Association welcomes the development of a Noosa River Plan and the goal of ensuring the river is managed and used safely, sustainably and positively but we do not believe draft 2 is adequate or complete and call for:

- Issues highlighted in this submission, our prior submission and other public feedback to be formally and openly addressed so the approved plan is sufficient.
- Community consultation to be extended beyond the peak tourism season to allow businesses and community sufficient time to engage with the plan.
- The plan has been on the drawing board for nearly 4 years and there is no legitimate basis to rush it through now with minimal consultation just ahead of an election.
- This draft 2 contains sections which are erroneous and/or redundant.
- At a minimum, Marine Safety Queensland's announcement of a permanent presence on the Noosa River makes Council's goal to "take control" of the river a flawed statement that will require significant rewriting of the plan.
- Significant changes are required to the draft plan which will require further community consultation in accordance with the Local Government Act.
- Consult openly with industry and community by forming a River Management Committee or Trust to provide input and expertise into the river's management plan and ongoing programs.
- There has been no meaningful consultation with any major stakeholders in recent times.
- Council's community jury did not provide a mandate as it lacked industry input or marine expertise and participants were given briefing papers that were heavily biased towards Council's goals.
- We welcome the opportunity to meet with Councillors and Council staff to discuss these issues in full so they can be properly accounted for in future revisions of this Plan. We call on the Noosa Council to ensure the Noosa River Plan is a comprehensive and substantial plan that can properly protect the iconic Noosa River and continue to provide a key recreational precinct for the community.

For additional comments on draft plan in conjunction with the Noosaville Commercial Business Association refer below-

#### Vision (as per comments above from Noosa Jetty Builders with changes or additions)-

- The published vision has been amended to remove reference to "the greatest possible community wellbeing now and into the future" and Councillors have adopted a vision limited only to "the healthiest and most biodiverse system in South East Queensland".
- This vision is inappropriately limited and lacks appropriate regard for social, cultural, historical and economic factors that are essential and appropriate factors in the long-term stewardship of the river and the Shire generally.
- The unilateral raising of environment above all other factors fails to meet the Council's own objectives of its 2018 Corporate Plan specifically Theme 3 to support an economy that is diverse and resilient and with a sustainable tourism sector.
- This amendment may create an inappropriate mechanism for future Councillors to ignore non-environmental factors including indigenous history, social inclusion, industry and community amenity when it balances decisions against environmental factors.
- Similarly, we question the relativity of arguing for the river to be the most biodiverse system in the region when no data is provided on its current status relative to other systems.
- Proposed action
- Revise the vision to ensure it accounts for factors such as community wellbeing as previously proposed.
- Provide clear and measurable performance indicators that address all community wellbeing factors.
- Provide a clear definition of what 'healthiest system' means and how it will be measured.
- Ensure the Noosa River Plan's Vision is aligned to all the themes of Council's Corporate Plan and not singularly limited to Environment. Provide analysis of current biodiversity and relativity to other "systems" and define if this refers to river systems or adjacent terrestrial and coastal systems.
- Council should form a River Management Group or Trust to guide its policy direction and implementation.

#### Legal Mandate

- Council proposes to take various actions without a legal mandate and in contravention of State and Federal legislation.
- The Plan variously proposes Council taking on compliance and enforcement of responsibilities over issues such as mooring, waste disposal, safety etc. as well as powers over commercial vessels that are vested in AMSA.
- While various suggestions are made that Council needs to negotiate such powers, it cannot put forward a plan that is full of actions dependent on gaining such controls until an appropriate legal process is documented and agreement reached (if ever).
- Our members strongly doubt such State and Federal powers will ever be ceded to a small regional Council.
- As such, we strongly oppose any river users being subject to Council's proposed River Management Unit seeking to enforce compliance when Council has no authority over them.
- Council has long advocated taking 'control of the river' but is no closer to gaining the required authority or mandate despite four years of discussion.
- The draft River Plan (and a large number of actions within it) cannot be premised on Council's unachievable aspiration to take over powers that will not be ceded to it.
- Proposed action
- Plan should be restructured to:
- Ensure any actions align to existing legislative powers for State and Federal agencies.
- Ensure any actions align to international marine regulations such as MARPOL and COLREGS.
- Develop a partnering approach with key State and Federal agencies to increase resources allocated to the Noosa River so compliance and environmental goals are achieved by the responsible agency (rather than Council seeking to do it themselves).
- Direct Council staff to consult with community and industry on the application of State and Federal legislation to better inform any future references in subsequent draft plans.
- If the Plan still recommends takeover of any legislative powers, then the plan must set out the process, timetable and communication plan for stakeholders to achieve that goal rather than just assume it will happen on the adoption of the plan.
- At present, no outcomes or milestones are listed towards a goal of a 'taking control'.

# Lack of Strategic Options

- The Plan argues for "taking control of the river" without addressing options or alternatives to achieve desired outcomes.
- Proposed action
- Plan needs to be restructured to ensure any issue that is described is substantiated with data, assessed, prioritised and specifically mapped to action plans/actions that will address it.

# Actions put forward do not properly align to or respond to key issues

- The plan describes "issues" based on personal perceptions and without data or evidence to support the statements or the declaration that they are "issues" which need to be addressed (e.g. Houseboats regularly breaking free and causing damage to infrastructure is cited as a major issue but rarely happens).
- Similarly, increased boat traffic during holidays is described negatively without explanation as to why it is so bad.
- Safety is also described as being compromised but there is no reference to any data on marine incidents in the Noosa River to substantiate the claim etc.).
- The plan gives inadequate consideration of the relative priority of issues, their seriousness or their impacts in any objective form.
- Rather, the Plan continues to nominate what some individuals think are the key issues without any comparative assessment or relativity.
- The Risk Assessment provided on page 59 is simplistic.
- We specifically note the risk assessment on page 59 does not attribute a single issue as a priority which relates to the commercial businesses operating on the river. Council however is proposing many actions and interventions in those businesses which are not supported by Council's own risk assessment.
- Proposed action
- Plan should delete any actions that are not directly linked to solving an identified and assessed risk.
- High risk items must be prioritised over low risk items even if Council's political agenda is in favour of them.
- Plan should properly consult with responsible State and Federal agencies in relation to safety, compliance and risk before making ill-informed assessments without data or technical reference.

# Plan needs to define the scope of waterways actually being addressed

- Plan defines its scope as "Noosa's freshwater creeks, wetlands, lakes, river estuary, coastal creeks and groundwater and incorporates a whole of catchment management approach" (page 5).
- The Plan however variously discusses the Noosa River and Noosa Waterways but extends into making arbitrary recommendations for singular matters relating to North Shore beaches and a single recommendation for Laguna Bay.
- Plan fails to comprehensively assess issues associated with Laguna Bay, southern beaches, river mouth or any local coastal or offshore waters.

- The Plan fails to comprehensively assess sub-zones within the river such as lakes or urban areas or provide specific responses to zone issues.
- The current piecemeal approach is considered inadequate in scope nor properly consulted with key marine environmental reference or research groups.
- Proposed action
- Plan needs a defined scope as to whether it is referring to inland/upriver waterways or all river and coastal areas.
- Plan then needs to be revised to align its scope (e.g. If it is only addressing river, then it should delete coastal references).
- If it is addressing upriver and coastal issues, then it needs significant additional work rather than the current piecemeal approach to selective species and topics.
- Plan should comprehensively assess and profile each major region in the river to provide strategies and actions that are properly responsive to each region's individual issues.

#### Actions not related to issues

- The first draft of the Plan (page 7) stated that the river was under pressure from many sources including recreational users and environmental impacts but did not attribute a single issue to commercial operators.
- The second draft similarly does not attribute a single issue or environmental impact from commercial operators however the report continues to inappropriately recommend Council taking control of commercial operators.
- The second draft similarly does not attribute a single issue or environmental impact to commercial operators, however the report continues to inappropriately recommend Council taking control of commercial operators.
- Action required by Council
- Council should ensure any actions are directly linked to clearly identified/and prioritised issues.
- It should not include vague political agendas in the plan if they are not causally linked to an actual issue that can be objectively assessed as causing negative impacts on the Noosa River.

#### Marine knowledge and experience

- Plan makes various references to marine safety and marine infrastructure however does not properly reference existing legislation, agency responsibilities, international regulations or do so with the input of appropriate marine qualifications.
- Many statements appear to be personal opinions and lack baseline data (eg. Boats regularly break free of their moorings and damage infrastructure) or understanding of marine regulations (eg. Duration for anchoring and marine pollution).
- Plan appears to be a desktop study and has no reference to baseline data for marine incidents.
- To our knowledge, Council staff / authors do not have any marine qualifications and/or on-river experience nor have they consulted with any industry members or marine experts.
- Actions required by Council
- Plan needs to be peer reviewed by marine industry experts.
- Plan needs to have input of State and Federal agencies before further considered by Council (noting it would be highly inappropriate for Council to approve a plan that recommends Council taking actions that would breach State and Federal laws (e.g. in relation to authority to enforce compliance).
- Plan needs to be edited to remove personal perceptions and unsupported anecdotes that have no baseline data.
- Plan needs to engage with industry in relation to marine infrastructure issues and strategies.

#### Implementation Plan

- To be effective, Objectives need to be specific, measurable and have a completion date.
- Most actions lack a completion date and are inappropriately vague which will make the plan fail and responsible officers unaccountable.
- Actions listed as for completion by 2030 need to have sub-actions with earlier completion dates so progress can be tracked on an annual basis.
- Actions required by Council
- Revise the Implementation Plan to provide more specific, measurable actions with clear completion dates that happen on at least an annual basis.

### Users

- The report makes inappropriate and subjective distinctions between residents and visitors (e.g. Objective 2 Residents and Visitors are compliant ....") without reference to any data or baseline data to infer either group causes different impacts or warrants different approaches.
- Council has no data that would enable them to differentiate between residents and visitors using the river. State and Federal marine regulations apply
  equally to all users.
- Action required by Council
- Remove inappropriate distinctions between residents and visitors.

# Message from the Mayor

- Accolades to environmental activists being the exclusive protectors of the river are inappropriately dismissive of the community and industry's efforts over decades.
- The Mayor's accolades for the Noosa Parks Association adds to a community perception of a conflict of interest given his relationship with NPA.
- Our members have operated continuously on the Noosa River for 70 years and are significant stakeholders who have contributed to the river system's success and sustainability, yet are denied meaningful consultation and their feedback to draft 1 has been ignored.
- The broader community are significant contributors to the river system's success and sustainability through their careful use, volunteerism and advocacy.
- Action required by Council
  - Rewrite the Mayor's Message to respect the many stakeholders that have contributed and continue to contribute as stewards of the river.
- Remove reference inferring that business owners have been actively engaged in this process as Council has had no active engagement with them.

# Introduction (page 5)

- The document states "The Plan applies to Noosa's freshwater creeks, wetlands, lakes, river estuary, coastal creeks and groundwater, and incorporates a whole of catchment approach to land based and on-river activities.
- The Plan also seeks to reduce diffuse pollution flowing from the land, to enhance the health of our coastal waters, beaches and reef."
- This scope is not applied consistently throughout the document nor is adequate regard given to non-river borne pollution issues that are affecting Laguna Bay.
- Examples of weaknesses includes usage issues associated with adjacent coasts (eg. dune protection, camping, 4WDs on beach, camels, national park etc).
- No reference to usage and litter issues associated with Hastings Street / Main Beach being the most highly used zone.
- There is no reference to litter pollution strategies such as beach cleaning.
- There is no comprehensive review of species. Most coastal species are ignored however there is an unusually large focus on the occasional marine turtle visit to the North Shore.
- No regard is given to significant species changes such as reported reduction in sand and mud crabs in the river or matters such as growing whale migration through Laguna Bay.
- No reference to shark nets.
- No other reference to "reef" in the report despite there being several in close proximity.
- Action required by Council
- Broaden the report to ensure it is comprehensive and addressing all known issues before prioritising strategies.
- Undertake public consultation on new strategies.

# Errors (page 31)

- Spelling errors
- Action required
- Correct spelling errors with NICA and Sea Shepherd

# Hincksia Blooms (page 37)

- Hincksia research referred to is 2006.
- Plan states Council "put in place a more proactive strategy should Hincksia blooms occur again" but the examples provided refer to a workshop and a sample collection program.
- Reference is made to a management strategy being developed in future however we believe sufficient time has passed for Council to have formed a view on what it will do if elevated nutrient levels are detected and/or another outbreak occurs.
- Actions required by Council
- Plan should reference more recent research if available.
- Plan should provide details on what Council will do in the event of another Hincksia outbreak.

# Living on the river (page 45-46)

- The Plan describes legal authority to enforce river matters then inappropriately segues into a randomly asked question "Local management now seems like a viable option, however would the community be supportive of this approach?"
- The sentence appears to be a badly edited leftover of some discussion document or timeline when the section should arguably end with a statement that Council has (like every other Council in Queensland) no power to enforce anything on water.
- Action required by Council
- Restructure this section to remove inappropriate questions and align headings.
- Amend Plan to properly acknowledge that many jury suggestions do not provide a mandate, were not based on any marine expertise or industry
  consultation or expert participation.
- Prepare a comprehensive cost benefit analysis of whether Council pursuing its aspiration to "get control" is an appropriate allocation of community funds.

#### Community Jury

- The section discusses community jury aspirations under the heading "Living on the river" which is a poor structure.
- Our Association views most of the jury's suggestions from 3 years ago as largely redundant as State and Federal
  agencies will not cede control, a permanent MSQ officer has been announced to bolster enforcement and risk profiles have
  changed.
- We believe the plan inappropriately infers that the community jury's aspirations (noted in detail) give Council a mandate when the process was deeply flawed. The jury who are understood to have lacked any marine qualifications were given briefing papers prepared by Council and with a strong bias towards Council's aspirations and little information explaining State and Federal legislation.
- It is inappropriate to state the jury made recommendations to Council when the process was based on Council's briefing papers to jury members which strongly promoted Council's preferred outcomes.
- Actions required by Council
- Amend report structure.
- Amend the report to note that the jury were given briefing papers that promoted Council's preferred outcomes.

### Pithy political statements (page 46)

- There is no evidence or data to support the statement that ceding control of the river to Council will "encourage a welcoming, friendly boating community which supports visitors as well as the expectation of residents".
- To date, Council has shown no intent to manage the river in a consultative manner or to work cooperatively with the "boating community."
- Action required by Council
- Amend the Plan to either remove pithy political statements.
- Reinstate community wellbeing to the Vision.
- Include community engagement and stakeholder satisfaction as a Measurable Outcome.

#### Jetty leases (page 43)

- The Plan should be revised to ensure the last two paragraphs are related to the heading and should be separated to a section relating to community use of the foreshore.
- Action required
- Restructure this section.

#### Sustainable Use (page 41)

- Objective #1 refers to "respects the river's carrying capacity" without any reference to how "capacity" will be assessed and by what Agency. It is noted that there is State jurisdiction over the Noosa River and Council offers no criteria or studies to inform such an assessment. No consultation with any stakeholders is referenced. This objective also fails to reference Council and State responsibilities to provide adequate infrastructure to support safe usage of the river.
- Objective #2 inappropriately infers "recreational and commercial fishing" determines fish abundance and diversity.
- This ignores the vast range of environmental factors influencing a species or the health of their environment.
- Objective #3 states the Objective of "River mouth and foreshores are preserved and protected to ensure the natural form, process and function of the river are not impacted". This statement is inappropriate given the vast number of historical and likely future interventions by Council to the river mouth, Noosa Sound, Main Beach and Munna Point. The reference does not correspond to Council's own recent Erosion Plans or other studies that suggest further interventions may be required.
- Actions required by Council
- Refine the wording of objectives to be more accurate and appropriate. Remove biased references within the objectives.

# Objective 2 (viii) page 62

- Refers to a new initiative of "Conduct regular compliance activities of the North Shore exclusion zone" when this is already a Council responsibility that is rarely actioned.
- The report should explain why Council does not carry out such responsibilities now rather than present them as new initiatives.
- Action required by Council
- Report should provide details of Council's commitment and results in enforcing compliance of current responsibilities rather than present them as new initiatives.

# Objective 3 (vi) page 63

- Suggests Council will undertake a roads sediment study.
- Recent works on the Noosa North Shore abutting the Noosa River and associated wetlands has seen dozers widen the road with little regard for debris clearance or road sediment runoff.
- Actions required by Council
- Ensure all road works minimise sediment runoff.

# Objective 1 (ii) pages 63-64

- Community jury recommendations are flawed as noted above. They do not provide a mandate or appropriate strategy.
- Re (a): Council is not responsible for anchoring and cannot "manage these activities"
- Re (b): There is strong opposition to Council pursuing this objective to take control of the waterway.
- Re (c): The objective should be to have State agencies undertake the review with input from Council.
- Re (d): The plan gives no indication of who./ how this determination will be made.
- Re (e): The report should state why these current responsibilities are not completed and argue for resources to deliver it. This is not a new initiative.
- Actions required by Council
- These objectives should be rewritten and rephrased to comply with jurisdictional responsibilities of State agencies.
- Council should remove any reference to having a mandate because of its flawed community jury process.

# Objective 1 (v) page 64

- As noted in reference to page 50, the report rightly notes that speed limits are an issue however fails to identify the full range of issues or properly scope any future assessment which should account for:
- Impact of vessel wash (boat and jetski) on other boats, jetties, ramps and pontoons (not just swimmers).
- Suitability of the current area of the speed restricted zone (e.g. Should it be extended or reduced?).
- Merits of some areas should having a year round speed limit change.
- Adequacy of signage.
- Lack of enforcement of speeds in the restricted zone.
- Lack of enforcement of speed limits upriver of the restricted zone particularly in relation to speeding jetskis and boats in the highly used area between Noosaville and Tewantin.
- Lack of enforcement after hours.
- Emergent issues such as flight boards not being governed by marine speed limits.
- Actions required by Council
- Broaden the review of speed limits to provide a comprehensive assessment

# Objective 1(vi) page 64

- This objective is considered inadequate.
- As noted previously, the Plan describes the growing usage of the river but fails to adequately or comprehensively address marine infrastructure requirements including:
- Does not comprehensively describe what infrastructure exists, usage, adequacy and/or issues associated with it.

- Outline what future infrastructure might be required, when and where.
- Distinguish between the infrastructure requirements of recreational users and commercial users.
- Consider options for new or different locations.
- In the four years Council staff have been writing this Plan, baseline research should have been completed to inform an infrastructure overlay for the river.
- Actions required by Council
- Plan should define and assess the reasonable infrastructure requirements of both recreational and commercial users now and into the future. Specifically, the report should address known infrastructure issues including:
- Adequacy of boat ramps and associated parking.
- Adequacy of ferry and charter boat terminals.
- Adequacy of boat repair facilities / slipway infrastructure.
- Adequacy of pump out facilities.
- Adequacy of marina/s.
- Potential for dry stack storage for vessels.
- Ensuring adequate marine repair facilities.
- Lighting all navigation markers throughout the river.
- Ensuring marine facilities are flood proof.
- Ensuring river mouth is navigable.
- Ensuring adequate public jetties (noting that some jetties are so high that they are unable to be used by boats; there are no published usage policies etc).

#### Objective 1(vii) page 64

- As noted, this objective to "improve obligations related to the ongoing management of commercial jetty leases" is a nonsense as the report fails to provide or describe a single material issue relating to the jetties or their management at present.
- An appropriate river plan should engage the leaseholders as key stakeholders but not seek to put forward interventions and actions that are not directly linked to any identified risk or issue.
- Actions required by Council
- Delete proposed actions to impose greater control or intervention on commercial leaseholders in the absence of a single risk or issue being attributed to their operation.

#### Objective 1 (viii) page 64

- As noted, Council has no authority to control commercial activities on the river if they are conducted lawfully in accordance with Federal and State legislation.
- It cannot assume jurisdiction.
- Similarly, Council's plan does not describe or attribute a single material issue or risk to river businesses other than apparently overwhelming staff with inquiries.
- Council has no jurisdiction, mandate or strategy to "guide and manage commercial activity on the river" and should respect existing legislation.
- Actions required by Council
- Delete proposed actions to impose greater control or intervention on marine businesses in the absence of a single risk or issue being attributed to their operation.

### Objective 2 (ii) page 64

- No cost benefit is provided to warrant Council conducting a buyout of any fishing licences.
- Actions required by Council
- Council should refer any buyout requests to the State.

### Objective 3 (ii) and 3 (iv) page 65

- Council has failed to properly engage or include community or industry in the development of this draft river plan.
- It is disingenuous to put forward an action proposing "establish appropriate communication and engagement mechanisms" without describing them in detail so the community and industry can be confident that they will be given greater involvement than provided to date.
- Actions required by Council
- Council should detail what engagement will be undertaken.
- Council should note our recommendation that a River Management Committee or Trust be formed.

# Objective 3(iii) page 65

- Council has no authority to enforce compliance of anything on the river.
- This action is flawed as Council lacks appropriate jurisdiction.
- Actions required by Council
- Amend any reference to jurisdiction to enforce compliance on river to refer to the appropriate agency. Council cannot assume a mandate or jurisdiction.

# Objective (vii) page 65

- Council has not provided adequate detail to the community to explain the implications of the marine protected area.
- Significantly greater information is required.
- Actions required by Council
- Amend any reference to marine protected areas to refer to Council prepare a detailed report for community consideration.

# Measures page 66

- An effective monitoring program will require significantly more specific and granular detail to assess progress towards any
- Every Target must be measurable with a specific date, and if that date is several years away, then progressive steps towards it must be stated.
- The Measures lack any reference to key elements of the plan including:
- marine safety
- river usage
- industry and community satisfaction and participation in decision making
- cultural impacts
- economic impacts
- marine species health/diversity/population
- cooperation with stakeholders
- cooperation with State and Federal agencies and their commitment to provide adequate resources
- Compliance
- waste impacts other than litter (eg. Sewerage)
- suitability of marine infrastructure
- Significantly, the proposed Measures do not even relate to the nominated vision of the river being the "healthiest and most biodiverse system in South East Queensland".
- Actions required by Council
- Ensure all measures are specific and measurable with suitable increments for monitoring outcomes.
- Include additional measures to ensure Council focuses on all key aspects of the river plan.
- Ensure Measures exist that relate to each Objective and the Vision itself.

### The Nature Conservancy -Reviewer 1

# General observations

- The Plan pulls together an impressive bank of information and has clearly been based on a consultative, collaborative and well-intentioned process across a diverse pool of Noosa River stakeholders.
- It gives a comprehensive account of the available information underpinning each priority area and, in most cases, the issues (e.g. threats, knowledge gaps, need for more management action) that the Plan seeks to resolve in order to achieve its ambitious vision of the healthiest waterway in SEQLD.
- However, at times I found the document a little unwieldy and was regularly re-reading guiding sections (e.g. Introduction, objectives) and seeking higher level summaries of key information to reorient myself. Some suggestions are below on ways to improve this.
- Introduction
- Suggest including a summary diagram of how the key sections of the document connect to and support each other to ultimately produce the Action Plan, i.e. a map of the document. The structure seems to be loosely based around the DPSIR (or similar) framework (i.e. with the River Health and Sustainable

- Use sections summarising the "Driver, Pressure, State and some of the "Impact" elements, and the Implementation, Action Plan and Monitoring sections summarising the "Response" element), so this could be a useful starting point for summarising the logic flow that underpins the Plan.
- Enhance the overarching objective of the Plan the vision is clear, but the objective gets a bit lost.
- Given the diversity of supporting documents and strategies that the Plan draws on (e.g. the 2017 Condition Assessment, research or community projects on particular ecosystem elements, Noosa River Community Jury outcomes, Noosa Council's Environment Strategy and Sustainability principles etc.), it would be really helpful to have a table or diagram that summarises these information sources and the parts of the Plan they support. This could go as an Appendix, but it would be helpful to flag this as a reference point early in the document.
- The current Managing for Change subsection seems more like a summary of major threats. Suggest renaming it as such, then finishing with a short subsection that summarises the planned management approach for dealing with the key challenge, e.g. an adaptive management strategy?
- River Health and Biodiversity
- This section contains a wealth of information, but I think would benefit from the following.
- A bit more structure at the front end to help unpack the flow.
- Trimming out some of the detail in some subsections, e.g. benthic biodiversity.
- More consistency in the type of information presented in each of the habitat sections (e.g. some contain background and recommendations, some are a mix of background, status-quo, threats and proposed actions etc.).
- Repackaging the *Rural runoff, Urban runoff and Wastewater treatment* sections as collective threats (or management issues) to the habitats identified in the Riparian and Wetland habitats section. Some overlap and repetition does creep in, however, given that the latter section also sometimes addresses threats. On this point, the "climate change considerations" subsection in the Riparian and Wetland habitats section seems out of place, given it is an overarching threat.
- Sustainable Use and Enjoyment
- Similar comments to above.
- Suggest the "Speed limits & public safety" subsection is better placed in the Recreational Boating section.
- Living on the river subsection is repeated from the River Health and Biodiversity area.
- Working together
- This is an integral part of the Plan, as stated in the Introduction. While the objectives are clearly stated, how all the stakeholders are brought together doesn't come through as clearly. Again, suggest including some kind of summary diagram that illustrates the stakeholder links to the Plan.
- Implementation
- Community input section seems better placed in "Working together".
- Noting the extent of information needed to produce the risk assessments, they are given a surprisingly low profile (and the text in the table is difficult to read, though perhaps this is an issue with the document resolution).
- Suggest a succinct summary paragraph highlighting the key risks that have been identified.
- Action Plan
- Great to see the Action Plan table that ties back to the objectives identified in each priority area, and consistently identifies the roles and desired outcomes for each.
- I would also suggest including an additional column that identifies the measurable targets for each (where possible). For example, rather than simply "Riparian areas are protected to stabilise banks.....", how much area over the next 5 years (e.g. an additional 15%?).
- Otherwise, there is a risk that stakeholders lose trust in the document. Additionally, undertaking a review of "progress against the stated objectives of the Plan" (as identified in the Monitoring and Evaluation section) is difficult when there are few quantifiable benchmarks against which to gauge success.
- Some of these targets have been included in the Monitoring and Evaluation section, and could be integrated into the Action Plan table.

# Does the plan identify and adequately address major conservation challenges?

- Yes, the Plan identifies the key conservation challenges to different ecosystem components and societal values at various stages throughout the document.
- As identified above, however, these could be more succinctly summarised to avoid diffusing the message.

### How does it compare with current best practice?

- The Plan often integrates best available information that is in many instances comprehensive, relevant and recent.
- It also touches on plans for best practice approaches with regard to restoring lost habitat, such as oyster reefs.
  However, it is unclear how widely some other relevant best practice approaches will be adopted in the Action Plan.
- For example, the River Health and Biodiversity section identifies clear knowledge gaps in the "habitat condition" of Noosa's waterways (p13). While occasional references are made to overarching health assessment programs (such as the Healthy Land and Water program), it is unclear how comprehensively each of the key ecosystem components in the Noosa River will be assessed and monitored for health status (e.g. report card grades) under the Plan.
- It is also unclear how widely predictive ecosystem modelling approaches will be used to better anticipate the likely impacts of key stressors, and adjust management strategies to suit.

# Are the proposed interventions commensurable with the threats?

- In general, yes.
- However, measuring the success of interventions in mitigating the impact of threats can only be achieved if clear benchmarks are established, quantitative indicators of ecosystem status are identified and regular monitoring and reporting systems are established.
- While baselines and monitoring are sometimes suggested in the Plan, it is unclear how widely they will be applied.

# Is there sufficient scope for research and innovation, community engagement?

- There is considerable scope for research and community engagement in the extent of work outlined in the Plan.
- It may also be useful to identify somewhere in the document (perhaps in the Action Plan section) the key knowledge or information gaps that could best be filled by these pathways.

### The Nature Conservancy – Reviewer 2

- The plan is comprehensive and well thought out, providing a full understanding of the factors that impact the health of the watershed / catchment area.
- The plan considers and describes well the physical, ecological, economic and social factors that characterize the watershed and its community.
- The plan balances economic and environmental health well and doesn't promote one over the other.
- (Page 20) It would be well for the community to evaluate baseline fish population conditions in the basin. With the commercial and recreational importance of fisheries in the community well-documented, a baseline population survey of fisheries in the watershed is merited and sets a foundation for adaptive management.
- There is a keen respect for indigenous peoples, the larger community and for cultural and historic resources. These sensitive areas may be threatened in the future by changing sea levels and development pressures. The community should be prepared to respond to these challenges.
- The plan provides measurable outcomes that are realistic and feasible. Community coordination and action will be required for success, but the value of the watershed to the community seems strong and well documented.
- In addition to providing measurable outcomes, the plan has developed a strong framework for accountability among various stakeholder groups.
- Unless I missed it (and I very well may have), it was not clear to me if the volume and quality of drinking water was a concern in the watershed. Healthy communities rely on clean, readily available drinking water as essential to the integrity of the community and economic and environmental health.

# A couple of additional minor points:

- Consider a different cover photo. I am concerned for the health of the boy on the dock and what may have just transpired. In all seriousness, a photo that has people and fish and boats, etc. could better represent the values of the community.
- On page 5, "Introduction," the "." is not needed after "Working Together" in the second column.
- Change 2019 to 2020, where appropriate.

### The Nature Conservancy – Reviewer 3

Water quality does not seem to be as elevated as I would expect.

- I think the report mentioned water quality has been decreasing and this can be a tipping point issue that affects everything else (habitat, fishing, oysters, recreation etc.). Water quality does not seem to have its own target on the monitoring and evaluation table (although I do see the A rating grade target). A lot of watershed plans in the US have TMDL (total max daily loads) assessments and goals for reducing loads but many of our systems are more impaired so it is hard to compare without knowing more.

I am also curious about the rate of development in the catchment or a projected development layer (maybe that's not a big deal yet).

- Same for impervious surface. It appears from the report that development and changing land use is not a threat? Hard to say because I am not very familiar with the catchment.

- Is protecting land within the catchment a strategy that has been considered? Old school acquisition can address some of the identified issues. Although best management practices can be helpful for reducing sediment and nutrient inputs, preserving land along the river and within the catchment (where feasible) can be more effective.

For the bit about dams, it is hard to tell if flood control and/water quantity management are an issue.

- We are finding in the US the decisions made long ago about where and when to store water are biting us on the arse now that the precipitation patterns are changing.

The septic tank situation also sounds a bit dreary. 41% percent are non-compliant.

- In Florida, local governments are now requiring many homeowners and businesses to convert septic to sewer (at the homeowners expense) because there have been so many problems with algal blooms.

Maybe I missed it but I don't have good sense about whether the rivers have high levels of hardening which can impact nutrient loads.

- It would also be nice to see some map that overlays the various priorities to see if there are hotspots in which you can really make a difference.

Overall this is pretty much in line with other plans I have seen.

#### Private

#### Overall comments

- This draft Plan is not good enough for the 2020s, for a sophisticated, modern, highly qualified, Australian community like Noosa, for the complex socio-ecological system that is the Noosa River, and which is the core of a 'world class' Biosphere Reserve.
- While producing this Plan would tick the Council's box of "produce a new Noosa River Plan", this draft does not do justice to the current Council's efforts to operate as a high-quality, professional administration. If anything, this Plan would demonstrate only that Noosa Council lacks the capacity to plan and establish an adequate management scheme for the Noosa River.
- Implementing this Plan will see flurries of ad hoc activity, but will not produce the substantive results and outcomes that are required for the future conservation and sustainable use of the Noosa River and catchment.
- In my view, the draft Plan should not be ratified in this Council's term; it should go back to the drawing board and its basic flaws should be rectified.

### More specific comments

- LACK OF GENUINE COLLABORATIVE APPROACH
- LACK OF COHERENT LOGICAL STRUCTURE
- LACK OF RIGOUR AND SUBSTANCE

### LACK OF GENUINE COLLABORATIVE APPROACH

- The overall Noosa river management scheme should be designed and established as a complete Co-Management Program, in which all the main stakeholder organisations are properly engaged and participating, in all the components of the program: planning, resourcing, governance, coordinated implementation and monitoring & evaluation of the (river management) scheme.
- It is difficult to understand why after 6 years, Noosa Council have not been able to establish an adequate mechanism to work with the other agencies involved and produce a plan together for co-management of the Noosa River.
- It is not good enough to suggest, as this draft does, that Council can govern or deliver an adequate river management program by itself; it does not have the authorities or capacities that will be required. The management scheme cannot be governed and managed by Council alone, working separately from (i) agencies (QG) with direct responsibility and authority over various aspects of the river system's well-being and use; or from (ii) the other LGAs with jurisdictions overlapping with Noosa's.
- Why was this Council not even able or willing to form at the outset of the process a suitably qualified external advisory group to guide the preparation of a new Noosa River Plan. It would have been so easy and constructively useful to have done so.
- The draft section WORKING TOGETHER is weak, too vague and wordy to be of value. It contains no clear strong specifications of whose or what work will be "done together". Significantly this section comes before the start of the IMPLEMENTATION section, confirming the impression that "working together" is merely a vague motherhood idea. The IMPLEMENTATION section makes it clear in the first paragraph who owns this plan and who intends to be the governing body with authority over all aspects of the river's and catchment's management:
- "The River Plan heralds a new era of catchment management in Noosa, and it is Council's primary role to coordinate and implement the programs and initiatives outlined within the Action Plan."
- (It is perhaps indicative that the author(s) could not resist inserting "and implement..." in this hubristic statement).
- It is disappointing that even the introductory Message from the Mayor makes no reference to the Noosa River as the ecological core of the regional biosphere, and thus misses the opportunity to place the management of the Noosa River clearly within the context of the Noosa Biosphere Reserve program. For me this exemplifies the mis-placed Council-centricity of this Plan, for which there does not seem to be an adequate reason.
- A related issue further negates the value of this being (only) Noosa Council's plan for the river's management: the catchment boundary and Shire boundary are not aligned; significant parts of the Noosa river catchment are in the contiguous Gympie Regional LGA; a significant portion of Noosa Shire is in the Mary River catchment rather than Noosa's; and the southern edge of the Noosa river system, Lake Weyba, is shared with the Sunshine Coast Regional Council area. Similarly, although the Message makes passing reference to the fact that "much of the river resides in the Cooloola section of the National Park", it does not take the opportunity to explain that this means that any Noosa River management strategy needs to be based on collaborative governance between 3 LGAs plus the State Government agencies with authorities over National Parks, waterways and coastal marine resources.
- These factors make the title of this draft Plan a lie: "The Noosa River Plan Whole of catchment management"; adding this cliché to the title of the plan will not make it happen if there is no genuine collaborative basis to the management scheme.

# LACK OF COHERENT LOGICAL STRUCTURE

- This draft Plan is very weak in terms of logical structure and specification of meaningful SMART actions and planned Results; it is a "shopping list" style of action plan with no clear strategic logic. There is no logical hierarchy of objectives providing the plan with a strong core framework. There are simply 2 sets of 3 Objectives, none written as SMART statements. Similarly there are no baselines, targets, milestones specified for any of the objectives, which further reduces their value.
- The core Management Plan draft 2 is as follows; there is no logical framework structure and no rigour or substance in the specified objectives:

River Health and Biodiversity – Not further specified as an Objective

Objective 1. Water quality is improved through whole of catchment management and sustainable land use management on land and in riparian areas

Objective 2. Aquatic biodiversity is improved, preserved and enhanced in diverse instream,

riparian and wetland habitats

Objective 3. Pollution sources are identified, and discharge into the river is effectively

managed to reduce impacts on waterways, wetlands and coasts.

Sustainable Use and Enjoyment - Not further specified as an Objective

Objective 1. Recreational and commercial use of the Noosa River waterways and foreshores is

undertaken in a way that protects ecosystem health, respects the rivers carrying capacity and environment values, and prioritises visual amenity and public safety.

Objective 2. Recreational and commercial fishing is undertaken in a sustainable way so there

is no long-term decline in fish abundance and diversity.

Objective 3. River mouth and foreshores are preserved and protected to ensure the natural form, processes and function of the river are not impacted.

Working Together – NOT an objective

- The lack of any logical structure and SMART wording makes this draft Plan rather meaningless, in the same way as its predecessor. The lack of clear, rigorous objectives means that success or Recreational and commercial use of the River is to be..... managed? in some vague ways;
- Recreational and commercial fishing is to be "undertaken in a sustainable way";
- The river mouth and foreshores are to be "preserved and protected" somehow.
- The objectives statements are vague and wordy rather than rigorously SMART. All of them need re-writing as SMART "single level" objectives.
- For example, "Water quality is improved through whole of catchment management and sustainable land use management on land and in riparian areas" is a (wordy and vague) two-level objective statement: the higher level objective is to "improve water quality" (more specifications should be provided); in

particular through the lower-level objective to extend "sustainable land-use management" practices (somehow, through fostering "whole of catchment" approaches, perhaps especially in riparian areas). In the logical framework, the higher objectives should be pushed up, above the lower-level objective.

### Boating Industry Association (BIA)

The BIA is the peak industry body in Australia which represents the interests of the boating industry, advocates for the boating public and supports safe, responsible and enjoyable boating. Boating is a way of life for many Australian families and that applies to the Noosa region in South East Queensland with its range of rivers, lakes, estuarine areas and access to the ocean. The vast majority of boating in the area occurs in family runabouts and small sail, and paddle craft. Boating on the Noosa waterways delivers social benefits for people of all ages, gender and ability; spanning the following: recreational and commercial participation in paddle, power and sail. It also supports: the economy; business; employment; tourism; environmental outcomes; and public health and well-being. In summary the BIA support:

- Safe, responsible and enjoyable boating across paddle, power and sail for the social, economic and environmental benefits that it can provide.

  This promotion should be delivered through an appropriate balance of regulation, education and compliance.

  Boating can deliver benefits across this 'triple bottom line' from improved mental and physical health, support for local business and local jobs, to low-
- impact access to the environment and more.

   An evidence-based approach to management of the waterways that delivers social, economic and environmental benefits.

Statistics used to inform and guide policy, and strategy must be relevant to the waterway and accumulated over ideally 10 years to support appropriate trend analysis. For example, the use of state-wide statistics regarding boat strike on turtles should be replaced with any such statistics for the Noosa River to ensure relevance for any proposed counter measures.

Appropriate data must be collected that supports policy, regulation, education and compliance; this should cover type/time/area data relating to vessels such as activity, incidents (safety/ pollution), complaints, visitation trends (type of vessel, postcode of origin etc.), tourism, business, economic benefit and demographics. This data/ statistics collection should also include Climate Change trends.

- Marine Safety Queensland (MSQ)/ Transport and Main Roads (TMR) to lead on vessel management on the waterway.

MSQ/ TMR manage the statutory framework for safe and responsible boating state-wide.

The state marine safety agency should lead in boating safety and infrastructure to ensure consistency and avoid duplication, confusion and additional red tape when it comes to boating – especially regarding public safety.

MSQ is under new leadership and is already taking measures to step up compliance and education in the Noosa area.

Meanwhile MSQ/TMR to step up education and compliance activity with immediate effect.

- MSQ/TMR to develop a Noosa – Regional Boating Plan which should be evidence-based and apply a Safe System approach i.e., safe people, safe vessels and safe waterways.

This plan should encompass safe navigation (i.e. water traffic) and maritime infrastructure (i.e. access and storage).

The aim should be less clutter from anchoring/ mooring, improved environmental outcomes, improved infrastructure to support safe and convenient access for people of all ages and abilities, and a culture of safer boating.

Such a Plan could well set a new benchmark in local waterway strategic management for the State and Noosa could be used as the pilot for such a program that would deliver ongoing benefits state-wide.

Council should recommend to MSQ the establishment of a Noosa Waterways Boating Advisory Group that could help inform development and delivery of a Noosa – Regional Boating Plan.

Additional to comments made under Sustainable Use and Enjoyment-

### Action 1.

No other Council in the State has such as role and BIA does not support the proposal to handover these responsibilities to Council as that would result in duplication of processes; a likely 'bubble effect' regarding state wide responsibilities for safe navigation, maritime products and services, and maritime infrastructure support; likely confusion amongst stakeholders regarding who is managing maritime issues such as safe navigation including responsibilities under the International Maritime Organisation (IMO) International Regulations for Preventing Collisions at Sea, 1972 and other state statutes. For example, Maritime Safety Queensland and the Department of Transport and Main Roads jointly administer the following maritime legislation in Queensland:

- Maritime Safety Queensland Act 2002
- Transport Operations (Marine Safety) Act 1994
- Transport Operations (Marine Safety) Regulation 2016
- Transport Operations (Marine Safety—Queensland Regulated Ships Miscellaneous Equipment) Standard 2017
- Transport Operations (Marine Safety—Domestic Commercial Vessel National Law Application) Act 2016
- Transport Operations (Marine Pollution) Act 1995
- Transport Operations (Marine Pollution) Regulation 2018
- Transport Infrastructure (Waterways Management) Regulation 2012

In addition, there is the Federal role that the Australian Maritime Safety Authority manages under the Marine Safety (Domestic Commercial Vessel) National Law Act 2012. AMSA consequently manages vessel survey and operations, and crew certification for such vessels which include hire and drive, charter, ferries, commercial fishing vessels.

Setting up Council to run a 'bubble' regulatory approach would likely lead to:

Additional costs (as Council does not have an appropriate system or structure in place to deal with boating at a suitable level (incl., of boating expertise) in HR, IT, Policy, Strategy, Capital Assets, Operating/ Compliance expenditure etc.);

Inconsistencies, confusion and or duplication of systems, products, programs and services to support safe and responsible boating;

Confusion regarding the designated 'combat agency' response to marine pollution events; and

Reduced capability to fund local programs, as the State agency can move resources and programs to meet demand and maximise efficiencies.

Action 3.

The Federal Govt announced the intention to support a new approach to recycling in Australia. The BIA has engaged the Federal Government on the issue of including recycling of vessels as part of this program.

If a vessel has no holding tank then people should not be licensed/ permitted to live aboard and there must be compliance/ audit of same to ensure any vessel licensed or permitted to be used as live aboard is complying i.e., any discharge of untreated sewage into the waterway should be dealt with by the full weight of the law

A Boating Infrastructure Strategy is required and it needs to be delivered and funded by the State Govt who has state-wide responsibilities for boating. BIA supports a system where funds raised by boating are ploughed back into boating.

Infrastructure must be built with safe navigation in mind along with the triple bottom line of Social, Economic and Environmental Benefits.

'Unseaworthy' - whilst the application of the term can include subjective elements and encompass ability of master and crew, in general it describes a vessels which is unfit for a sea voyage (of a boat or ship) not in a good enough condition to sail on the sea, or not 'reasonably fit in all respects to encounter the ordinary perils of the seas of the adventure insured (Dixon v Sadler (1839)). Unseaworthy criteria would include the following - unable to complete a voyage, as is and under its intended and designed method of propulsion (e.g., sail, paddle or power) without undue risk of capsize, sinking, polluting the waters or causing death or injury to a person.

# Action 5.

MSQ should lead and deliver on this matter with support from Council for the similar reasons outlined under response to #2 and 3. Especially, looking to the regulation, education and compliance model applied to anchoring, mooring and living aboard in other states such as NSW (where living on board is basically prohibited). Consider having moorings managed by commercial operators such as marinas that would deliver better social, economic and environmental outcomes. Action 12.

Council should apply innovation and solutions which are customer focused. For example, look to sustainable boating solutions such as minimal wash, electric water taxis such as those being trialled in Europe.

Promote water activities such as boat hire across power, paddle and sail.

Encourage water tourism that is delivered by professional operations.

Encourage the use of boating infrastructure such as boat storage, marinas which can deliver social, economic and environmental benefits. Be innovative, collaborative and solutions and customer focused.

To address Council's invitation posted on its consultation pages of its website to 'provide any other comments you would like', the following is offered for consideration in review of the draft Plan:

Social Benefit

Boating delivers social benefits for people of all ages, gender and ability; spanning the following: recreational and commercial participation in paddle, power and sail; public health and well-being; employment; tourism; environment; and economic.

Boating in Australia has a connection with the Aboriginal people of this land who were using watercraft such as back canoes an estimated 8000 years ago. This was for transport, exploration and food gathering. Those themes continue today for boating in all its forms across paddle, power and sail. It is recommended that the Welcome and Introduction pages of the draft Plan better reflect Aboriginal cultural significance to this area. This should be addressed to seize upon an opportunity to make a strong statement about Aboriginal stewardship and cultural significance. Perhaps the Plan can help better engage Aboriginal peoples into the Plan. As it currently stands, and not to forget those in our community who are less fortunate, Australians are collectively wealthier, living longer and better educated than ever before; and are settling in coastal areas for the lifestyle benefits which includes being on, in, under and by the water. The Federal Government says more than 85 per cent of the population live within 50km of the coast. Little wonder almost 1 in 5 households can have a boat or watercraft. Whilst metropolitan areas across the nation do provide a concentration of population and therefore are areas where boating has a strong foothold, a significant amount of boating activity takes place in rural and regional areas nationwide. Boating is a vibrant and significant part of the social (including cultural), economic and environmental fabric of the nation. Health and Well Being

The marine biologist Dr Wallace Nichols is internationally renowned for his study which, though a scientific evidence-based approach, has shown getting out on the water in a boat promotes rest, with significant physiological and psychological benefits. He has found that with our lives getting increasingly busy and stressed, boating is the perfect way to unwind and relax. His research includes the vast cognitive, emotional, psychological, social, physical, and spiritual benefits that we can all derive from healthy waters and oceans throughout our lives.

Through his research work, Dr. Nichols has identified that the mere sight and sound of water promotes wellness by lowering cortisol, increasing serotonin and inducing relaxation. Being on the water promotes physiological and psychological benefits that help manage trauma, anxiety, sleep, autism, addiction, fitness, attention/focus, stress, grief, PTSD, build personal resilience, and much more.

His study in the US has shown that 84% of parents think their kids would be more likely to unplug on a boat trip versus a road trip. On a boat, feel-good hormones (dopamine, serotonin, oxytocin) go up, while stress (cortisol) goes down. Dr Nichols says: "Being on a boat is one of the best ways to access the wellness benefits of the water".

As just one example, the waterway has considerable potential to support the Sailability program which runs across Australia and provides people of all ages and ability the opportunity to experience low-impact and safe enjoyment of the waterways.

#### Economic Renefit

In Australia, there are more than 910,000 registered vessels and a countless number of craft (such as paddle craft) which do not require registration or licensing. New boat registrations number 15,000 a year.

The BIA represents more than 1100 businesses in Australia with members operating in manufacturing, wholesale and retail of products and services within the boating industry. This includes commerce such as: new boat sales; charter operators; mooring and marina operators; yard/trade services; engine and aftermarket products; used boat sales and services; retail and wholesale operators across all sectors; boat builders; component manufacturers and fabricators; professional service providers such as insurers, lawyers etc.; media; education providers; boat storage operators; and kindred sporting groups such as sailing and boating clubs. Whilst metropolitan areas across the nation do provide a concentration of population and therefore are areas where boating has a strong foothold, a significant amount of boating takes place in rural and regional areas nationwide.

The boating economy generates significant social benefits through employment, much of which is supported by family businesses.

In 2018-19 the industry had a turnover of \$8.65 billion, directly employed more than 28,000 people with more than 14,500 contractors. Seventy-five per cent are in small businesses, employing local workers and supporting local communities.

Boating plays a significant role in tourism in Australia, through recreational and commercial activities ranging from hire boat operations in regional areas through to events that register on an international scale such as yacht racing.

In total, tourism contributes more than \$57 billion to the national economy with more than 640,000 tourism jobs with the boating sector a significant contributor. Boating contributes to the tourism economy through both recreational and commercial activities ranging across fields such as recreation boating and fishing, through to transport and charters.

Boating is significant for employment, communities, social wellbeing, culture and economy.

The Draft Noosa Plan often refers to increasing boating numbers but there is scant data presented to validate those claims. The BIA supports improvements in collection of relevant and robust data to inform appropriate strategy and policy.

### **Environmental Benefit**

The BIA supports the language in the Draft Noosa Plan that reads: 'Noosa's Local Economic Plan identifies rural enterprise as a priority sector moving forward. The plan recognises that Noosa is already well known for food, and the increasing demand for clean, green, sustainably-produced local food and beverages suggests there are opportunities to build on the local agriculture sector and establish a premier food and beverage brand.'

The BIA is committed to the care and sustainability of the aquatic environment which is fundamental to ensuring ongoing and improving economic, social and environment benefits. Boating is best enjoyed in a clean and healthy environment, and the industry is a strong advocate of measures and controls to enhance the quality of the environment.

The boating public observe the quality of the marine environment first-hand and are positioned to play an active role in protecting it.

The industry continues to move with the times and respond to market demand. Powerboats have increasingly lower carbon monoxide emissions and improved fuel efficiency. Advances in technology have led to engines, such as the new breed of clean technology outboards that are increasingly quiet, with some producing barely audible noise at idle. The market is responding to consumers who are looking to invest in clean and efficient technology; reducing their burden on the environment, and which are inexpensive to run. There is also the emergence of electric-powered boats which produce zero emissions and virtually zero noise. This is all a far cry from the old two-stroke outboards that were known to emit relatively high levels of noise and smoke.

Personal watercraft are the fastest growing sector of powered vessels with 76,000 now registered across Australia. These craft have also undergone a transformation to 4 stroke engines which are much quieter, produce less emissions and the latest models facilitate on-water braking. Boats provide a relatively low-impact opportunity to access and explore the environment when compared with the significantly higher impact (e.g., roads, pathways and rail corridors) necessitated by the use of other modes of transport such as motor vehicles, trains, and even bicycles and foot traffic in popular areas.

Responsible use of paddle, power and sail boats can provide a unique opportunity to access the environment and to leave no visible signs when compared with virtually any land-based mode of transport.

Vessel waste containment and treatment systems are improving all the time, especially with installation of sewage holding tanks and pump-out facilities for boats. Marine coatings used for anti-fouling on the hulls of vessels are also improving all the time.

Marinas and slipways now employ environmental systems to prevent pollutants from entering the waterways. With contained hardstand facilities at marinas for boat maintenance, rubbish collection and recycling facilities and the modernisation of boats with holding tanks to comply with environmental legislation there has been a dramatic improvement in water quality and preventative environmental practices. In Australia, 89% of marinas, provide boaters with information about environmentally responsible boating practices and 91% practice recycling of paper, plastic, glass, metal and batteries. The Marina Industry Association has also committed to removing single-use plastics from its marina / shipyard / business by 2025 by encouraging members to take a pledge of action. BIA supports the principle to reduce and eventually eliminate the use of single use plastics in our industry. This includes an understanding that we need to proactively address the single use of plastics in our supply chain. Marinas also allow for boat storage and servicing facilities to be concentrated in the existing and accredited commercial marina facilities which in turn help to manage environmental risk, improve environmental outcomes and public benefit. Marinas (including dry-boat storage) provide a unique opportunity to manage environmental impact whilst delivering safe and convenient access for a growing population.

The Boating Industry Association (BIA) commend Noosa council for the opportunity to provide our input. The BIA is available to consult further on this subject.