

Comment – Capricorn Coast Marine Community Inc.

Comment

This submission outlines practical barriers affecting marine wildlife rehabilitation capacity and stranding response effectiveness in Central Queensland. It highlights the challenges faced by a newly established not-for-profit organisation seeking to develop a sea turtle rehabilitation facility, including high upfront planning and approval costs, and limited access to funding for pre-construction stages.

The submission also identifies coordination issues within marine wildlife reporting systems (QWildlife and 1300 services), where inconsistent visibility of authorised response organisations can reduce the efficiency of wildlife rescue operations.

Overall, it argues that current regulatory, funding, and operational arrangements can delay or constrain the delivery of conservation infrastructure, resulting in increased transport distances, pressure on existing facilities, and reduced regional response capacity. It recommends improved integration of wildlife response networks, streamlined approval pathways, and better alignment of funding with the full lifecycle of conservation projects to improve outcomes for marine wildlife in Queensland.



Submission to the Queensland Productivity Commission

Impact of the Australian Government's 2025 Environmental Protection Reforms on Queensland

1. Introduction

Our organisation is a volunteer-based not-for-profit established on 18 December 2024 to develop marine wildlife rehabilitation capacity in Central Queensland, with a specific focus on sea turtle rescue, stabilisation, and rehabilitation.

We secured a lease for our proposed facility site on 18 March 2025 and are currently progressing a staged development (Stages 1 and 2), with an estimated total capital cost of approximately \$4 million or more.

The purpose of this submission is to highlight practical operational barriers affecting the establishment of marine wildlife rehabilitation infrastructure and the effectiveness of the marine wildlife stranding response system in Queensland.

These issues are directly relevant to the inquiry's focus on:

- Regulatory burden
- Implementation risks
- Operational arrangements
- Regulatory efficiency

2. Project Purpose and Conservation Need

The proposed facility aims to strengthen regional capacity to respond to stranded and injured marine turtles in Central Queensland.

At present, turtles requiring rehabilitation are often transported long distances to existing facilities, including travel along the Bruce Highway between Yeppoon and Gladstone. These transport requirements introduce additional stress and risk for both animals and volunteer carers.

A local rehabilitation facility would:

- Reduce transport distances and associated animal welfare risks
- Improve response times for stranded or injured turtles
- Provide stabilisation and overnight veterinary support locally
- Strengthen coordination between rescue, veterinary, and rehabilitation services

- Improve safety outcomes for volunteers involved in transport operations

The Central Queensland region currently has limited localised marine turtle rehabilitation capacity relative to incident frequency and geographic spread.

3. Marine Wildlife Stranding Response System Coordination

A key operational issue relates to the consistency and visibility of marine wildlife response options within public reporting and coordination systems, including QWildlife and the 1300 wildlife reporting service.

Where all authorised marine wildlife rescue and rehabilitation organisations are not consistently visible or clearly integrated into these systems, it may:

- Limit effective use of available local response capacity
- Increase reliance on a small number of receiving facilities
- Reduce flexibility during peak stranding events or emergencies
- Create delays in matching stranded animals with the most appropriate local responder

The effectiveness of the stranding response system could be improved by ensuring all appropriately authorised organisations are clearly and consistently listed within official reporting and referral systems, where operationally suitable.

4. Barriers to Establishing Rehabilitation Infrastructure

A significant barrier to establishing new rehabilitation capacity is the cost and complexity of early-stage planning and approval processes.

We have been advised that progressing to the development approval stage requires approximately \$100,000 in reports, assessments, and technical documentation prior to construction commencing.

For volunteer-based not-for-profit organisations, these upfront costs represent a major barrier and must often be incurred before eligibility for many grant programs.

This creates a structural issue where:

- Conservation need is established
- Community support exists
- Suitable land is secured
- But projects cannot progress due to upfront regulatory and planning costs.

5. Funding and Sequencing Gap

Current funding arrangements for conservation and wildlife projects often prioritise:

- Operational delivery
- Equipment purchase
- Program implementation

However, they less frequently support:

- Planning approvals
- Environmental assessments
- Development application costs
- Pre-construction feasibility requirements

As a result, projects can stall at early stages of delivery, not due to lack of merit or demand, but due to misalignment between regulatory requirements and funding eligibility pathways.

6. System-Level Impacts

These combined issues can result in:

- Delayed establishment of rehabilitation capacity
- Increased transport distances for injured wildlife
- Greater pressure on existing rehabilitation facilities
- Reduced redundancy in regional response capability
- Missed opportunities for localised, rapid intervention

From an operational perspective, conservation policy effectiveness should be assessed not only by regulatory intent, but by whether it enables timely and practical delivery of conservation infrastructure and outcomes.

7. Recommendations

We respectfully recommend consideration of the following reforms:

1. **Improved integration of marine wildlife response organisations**
Ensure all appropriately authorised rescue and rehabilitation groups are consistently listed and accessible through QWildlife and the 1300 wildlife reporting system.
2. **Streamlined approval pathways for rehabilitation infrastructure**
Develop clearer and more proportionate approval processes for not-for-profit conservation infrastructure projects.
3. **Better alignment of funding with project lifecycle stages**
Expand funding eligibility to include early-stage planning, approvals, and development costs.

4. **Recognition of rehabilitation facilities as critical conservation infrastructure**

Acknowledge marine wildlife rehabilitation facilities as essential components of Queensland's stranding and conservation response system.

5. **Support for distributed regional capacity**

Encourage multiple regional rehabilitation options where appropriate to improve resilience, reduce transport distances, and enhance response capability.

8. Conclusion

The primary constraint on expanding marine wildlife rehabilitation capacity in Queensland is not a lack of conservation need, community support, or operational demand.

Rather, it is the combination of:

- High upfront planning and approval costs
- Limited funding coverage for pre-construction stages
- Coordination limitations in public response systems

This results in a misalignment between conservation intent and conservation delivery in practice.

Addressing these issues would improve the efficiency and effectiveness of conservation delivery, strengthen marine wildlife outcomes, and enhance the operational resilience of Queensland's stranding response system.

We appreciate the opportunity to contribute to this inquiry.