

gnaraloo wilderness foundation

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To: Hon. Benjamin Wyatt MLA

Treasurer & Minister for Finance; Aboriginal Affairs; Lands

11th Floor Dumas House 2 Havelock Street

WEST PERTH WA 6005

Via: minister.wyatt@dpc.wa.gov.au

NOTICE OF HARM TO ABORIGINAL AND ENVIRONMENTAL HERITAGE VALUES AT GNARALOO CAPE FARQUHAR SOUTHERN NINGALOO COAST NATIONAL AND WORLD HERITAGE AREA

The Gnaraloo Wilderness Foundation Incorporated (**GWF**) is a not-for-profit charity in Western Australia with a broad membership in Australia and overseas. Its work focuses on the Gnaraloo location (~90,000 hectares) in the Ningaloo Coast.

The Gnaraloo Coast is indicative for the southern Ningaloo National and World Heritage Areas and the southern portion of the Ningaloo Marine Park. The GWF is the lead NGO for the Gnaraloo location with a long-established reputation, on-ground presence since 2005 and an in-depth scientific knowledge of the area. Information about Gnaraloo can be found at <https://gnaraloo.org/the-gnaraloo-wilderness-area/> and [The Southern Ningaloo Coast and Ningaloo Reef - Gnaraloo Wilderness Foundation](#)

Work by Deloitte Access Economics values the contribution of the Ningaloo Coast to Western Australia (**WA**) at more than \$110 Million during 2020. Ningaloo is estimated to have supported more than 1,000 full time jobs in WA in 2018-19, with employment concentrated in tourism-related industries. Since then, there has been ever increasing tourism demand on the Ningaloo Coast. Responsible management is required to protect the Ningaloo asset by looking after the environment.

The Minister is hereby notified of a current matter at Gnaraloo which is placing a mosaic of national and world heritage values at risk in the area, including unique Aboriginal, paleontological, cultural, archaeological, geological and biodiversity values (information below).

The matter is referred to the Minister for action and redress under s17 of the *Aboriginal Heritage Act 1972 (WA)* and Regulations 6 - 10 of the *Aboriginal Heritage Regulations 1974 (WA)*, which provides for the recognition, protection and preservation of Aboriginal sites and objects.

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An important heritage locality at Gnaraloo, being the **Gnaraloo Cape Farquhar area**, is presently subject to damage given on-ground impacts from uncontrolled tourism. This stems directly from the decision by the Shire of Carnarvon on 24 November 2020 to open the unsealed track in the Gnaraloo coastal north on 1 December 2020 that had been closed-off to public use for decades, without adequate risk and safety assessments and management measures being in place. Their minutes of 24 November 2020, and the letter in dissent from the Department of Biodiversity, Conservations and Attractions WA (DBCA), at [Minutes and Agendas - Shire of Carnarvon](#)).

This unsealed track is now subject to traffic which will increase significantly during school holiday periods as it connects the Gnaraloo, Quobba and Warroora localities on the Ningaloo Coast with Coral Bay, access which was previously not possible due to the track being closed to public use.

The opening of the unsealed Gnaraloo Cape Farquhar track to the public, without adequate assessment and management in place, is causing active damage to the unique heritage values of the area. There is now rife uncontrolled public usage of the area with illegal camping and 4WD traffic (more information below). The present situation being allowed to occur at the Gnaraloo Cape Farquhar area is akin to the damage caused to the Juukan Gorge in the Pilbara during 2020 over which there was worldwide concern.

Please see: https://fb.watch/2rRvyl0C_X/

Some of the harm to the heritage and environmental values at the **Gnaraloo Cape Farquhar area** is set out below.

1. Most of the **unique Aboriginal values** of the Gnaraloo Cape Farquhar Area have not yet been formally catalogued and are at serious risk of destruction and loss due to 4WD traffic and illegal camping prior to recognition and protection measures being put in place.

The Baiyungu Tribe of the Ganyara People are the Traditional Owners of the Gnaraloo locality. They are legally represented by the Nganhurra Thanardi Garrbu Aboriginal Corporation RNTBC (**NTGAC**).

2. The opening of the unsealed Gnaraloo Cape Farquhar track, without adequate assessment and management in place, may potentially affect listed '**Matters of National Environmental Significance**' under the *Environmental Protection Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**), namely:
 - i. world heritage properties: the Ningaloo Coast World Heritage Area.
 - ii. national heritage places: the Ningaloo National Heritage Area.
 - iii. listed threatened species and ecological communities: the *Caretta caretta* and *Chelonia mydas* species at the *Gnaraloo Cape Farquhar Turtle Rookery* (information below).

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- iv. migratory species: the *Caretta caretta* and *Chelonia mydas* species at the *Gnaraloo Cape Farquhar Turtle Rookery*.
3. The Gnaraloo Cape Farquhar area is in the **Carnarvon Basin National Biodiversity Hotspot** (Ref. Commonwealth Government 2003 and State Government 2006) with mega-fauna remains and fossils within its dune systems. This area falls in and immediately adjacent to the Ningaloo National Heritage Area, the Ningaloo Coast World Heritage Area and the Ningaloo Marine Park.
4. The Gnaraloo Cape Farquhar area is a unique reference site for the Ningaloo Coast given previous unusually low human and stock impacts and disturbances for decades. The area is noted as an “**Area of Environmental Management Priority with high conservation value which should be managed to a high status of protection**” (Ref. State Government 2004), with endemic flora species and a Karst sub-surface environment that are habitat to Troglodfauna and Stygofauna species, some of which are rare and believed to face extinction.
5. Gnaraloo has important coastal rookeries at *Gnaraloo Cape Farquhar* and *Gnaraloo Bay* for threatened, vulnerable and endangered loggerhead sea turtles (*Caretta caretta*) and green turtles (*Chelonia mydas*), which are protected species under the EPBC Act. Information at: <https://gnaraloo.org/our-reports-and-papers/>.
 - a) The GWF’s *Gnaraloo Turtle Conservation Program (GTCP)* undertook scientific monitoring of sea turtle nesting activities on the Gnaraloo coastline for a decade from 2008 – 2018 (see <https://gnaraloo.org/gnaraloo-turtle-conservation-program/>). The GTCP worked intensively in the Gnaraloo Cape Farquhar area for 15 years. The important **Gnaraloo Cape Farquhar Rookery** is 14km long which coincides with the *Farquhar Marine Sanctuary Zone* of the Ningaloo Marine Park.
 - b) The annual sea turtle nesting season at Gnaraloo is generally from November to May based on the GTCP data over 10 years (note: this period may become subject to change if impacted by climate change, therefore it is uncertain when the turtles are actively nesting. Human disturbances should always be kept away from key turtle nesting rookeries, including those at Gnaraloo).
 - c) The opening of the unsealed Gnaraloo Cape Farquhar track, without adequate assessment and management in place, have facilitated illegal camping and 4WD traffic in, and on, the *Gnaraloo Cape Farquhar Sea Turtle Rookery*. These disturbances are negatively impacting sea turtle nesting activity and may impact hatching success during the current active sea turtle nesting season, which is unacceptable.
 - d) Mujan (turtles) are an extremely important species to Traditional Owners and feature strongly in dreaming stories and as a totem to the Baiyungu Tribe. The international importance of the Ningaloo Coast as a turtle rookery is partly why the area is World Heritage listed. The important *Gnaraloo Cape Farquhar*

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Turtle Rookery and the *Gnaraloo Bay Turtle Rookery* at Gnaraloo are part of this dreaming timeline and should not be compromised or lost.

6. The Gnaraloo Cape Farquhar area includes the **Farquhar Marine Sanctuary Zone** of the Ningaloo Marine Park which is now subject to illegal fishing impacts.
7. The GTCP strictly controlled its vehicle movements over a 10-year period at the **7Mile-Beach-Point-and-Weather-Station location** within the Gnaraloo Cape Farquhar area (one of the GTCP's survey point assembly areas). This successfully allowed revegetation of the area which was previously blown out. This area is in a fragile and harsh coastal environment with constantly mobile dunes and large movements of wind-blown sands. This area is now subject to 4WD traffic and illegal camping with the vegetative gains over a decade at risk of loss.

We call for the State Government to:

1. Protect the unique and valuable Gnaraloo Coastal North, from Gnaraloo Bay to the Gnaraloo/Warroora boundary, to ensure responsibly managed visitor access and enjoyment.
2. Linked to this, to consider specific legislative recognition of the important *Gnaraloo Bay* and *Gnaraloo Cape Farquhar* loggerhead beach rookeries as turtle nesting sanctuaries.

The Gnaraloo locality is indicative for the southern Ningaloo Coast National and World Heritage Area, an area which historically has received little financial investment and management resource allocation, with most attention focused on the northern Ningaloo Coast around Exmouth.

We urgently call on the State Government to act to stop the damage and destruction of the Gnaraloo Cape Farquhar Area as soon as possible through closure of the 6Mile gate with adequate assessment and management in place prior to a re-opening of the unsealed track being considered.

The GWF offers its help to cooperate in investigation and resolution of this issue.

Yours sincerely

Karen Hattingh

Chairperson

For the GWF Committee

Gnaraloo Wilderness Foundation Inc.

Ningaloo Coast World Heritage Area, Western Australia