

The Research Director
Environment, Agriculture, Resources and
Energy Committee
Parliament House
George Street
BRISBANE QLD 4000

12 August 2011

Our ref 12220/80119639

Dear Mr Hansen

Submission regarding Water and Other Legislation Amendment Bill 2011

We refer to the Water and Other Legislation Amendment Bill 2011 (**Bill**) which was referred to the Environment, Agriculture, Resources and Energy Committee on 17 June 2011.

Thank you for the opportunity to make a submission on the Bill.

Seqwater notes that the amendments proposed to the Water Act 2000 (**Water Act**) by the Bill provide for, among other things, the concurrent development of water resource plans (**WRPs**) and resource operation plans (**ROPs**). This concurrent development process also appears to include a concurrent period for making submissions about draft WRPs and draft ROPs.¹

Given that the submission period for both draft plans will run contemporaneously, Seqwater is concerned that this may not give sufficient time for both plans to be properly considered. In order to make informed submissions on a draft WRP or ROP, Seqwater requires time to test and confirm the various assumptions involved in the modelling that underpins the plan. The 30 business day period provided under the current regime may not be sufficient to undertake this process in relation to both plans at the same time.

In terms of risk mitigation, Seqwater, as a Resource Operations Licence holder has a high degree of interest in ensuring the conditions imposed through ROPs are achievable and do not impose excessive regulatory burden.

Therefore, Seqwater submits that the minimum period for submissions under s. 49(3) and s. 100(5) be extended from 30 business days to 45 business days.²

Please contact us if you would like further information regarding this issue. Our contact is Claire Thorstensen (A/Manager Integrated Asset Planning), who can be contacted on (07) 3035 5595.

Yours faithfully



J. Alce

¹ Under proposed new s. 100(3) of the Act, public notice regarding the draft ROP must be published together with the public notice regarding the draft WRP. This means that both submission periods will begin on the same day.

² Section 49 and s. 100 are proposed to be amended under clause 19 and clause 35 of the Bill. Our reference to s. 100(5) is a reference to the section as it is proposed to be renumbered (currently s. 100(3) of the Act).