

Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025

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Submission By: Caravan Parks Association of Queensland Ltd
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Committee Secretary

Health, Environment and Innovation Committee
Parliament House
George Street
BRISBANE QLD 4000

**Re: Environmental Protection (Efficiency and Streamlining) and
Other Legislation Amendment Bill 2025**

Caravan Parks Association of Queensland (CPAQ), as the peak body representing Queensland's caravan and residential parks, appreciates the opportunity to provide further comment to the Committee on the *Environmental Protection (Efficiency and Streamlining) and Other Legislation Amendment Bill 2025*. Caravan and residential parks play a vital role in Queensland's tourism economy, regional communities and housing landscape, and a fair and efficient regulatory framework supports these broader public outcomes.

In our original submission to the Department on the consultation paper *Realising efficiencies and streamlining in the Environmental Protection Act 1994 and other portfolio amendments*, we strongly supported the introduction of mandatory codes of practice for selected low-risk Environmentally Relevant Activities (ERA), including small sewage treatment plants and water treatment systems commonly operated within caravan and residential parks. Our submission emphasised that these systems are low risk when properly managed, and that the current Environmental Authority framework imposes disproportionate administrative and financial burdens on small operators.

We note and welcome the inclusion in the draft Bill of provisions that:

- enable ERA codes to replace the need for an Environmental Authority (EA) where risks are well understood and can be managed through standardised conditions
- allow existing operators to elect to remain under their current authority, ensuring fairness and continuity
- ensure that ERA codes will be developed through a transparent process, including public consultation and Parliamentary scrutiny.



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These elements reflect the key principles in our earlier submission and demonstrate responsiveness to concerns raised by our sector.

The current EA process has imposed significant time and cost burdens on caravan and residential parks, with feedback from our members highlighting issues including:

- Onerous compliance requirements which vary by region
- Inconsistent and sometimes adversarial enforcement practices
- Complexity in navigating the EA process, including difficulty obtaining clear advice on compliance pathways and amendment processes due to individual variations in approvals

We reiterate that **treatment plants operated by caravan and residential parks are inherently low risk**, given:

- their risks are well known and management practices are well established;
- their comparatively small design capacity;
- their operation in controlled environments by owners with strong commercial incentives to maintain safe and compliant systems; and
- the predictable nature of contaminant flows within these settings.

On this basis, we encourage the Committee to support the early transition of these systems to a code once the framework is established.

It is important that any codes:

- are clear and designed to accommodate varying site conditions
- establish reasonable and consistent standards that reflect the low-risk nature of well-maintained sewage treatment plants operated by responsible park owners.

We support the recommendation that existing operators may opt out of a code and remain under their current EA and that new operators may apply for an EA if they cannot meet code conditions.

Given the inconsistencies experienced by operators under the current framework, clear transitional guidance and consistent regulatory interpretation will be essential to ensure confidence in the new system. Further, due to these challenges, and the low risk nature of these plants, progressing treatment systems designed for a capacity of up to 1,500 EP) as an early tranche for code development would deliver immediate and meaningful regulatory improvement.

As the Bill establishes the enabling provisions and does not define the details of any codes for sewage and water treatment plants, we wish to express our support of the recommendation that codes undergo public consultation, impact assessment and parliamentary review. We believe it is critical that the development of any codes are undertaken with robust industry consultation. As the recognised peak body for this sector, CPAQ would welcome the opportunity to provide informed advice about treatment plants operated in a caravan and residential park context. Effective co-design or consultation will ensure that any future codes are workable, proportionate, and capable



of being implemented by small and medium caravan and residential park operators across all regions of Queensland, not just those in metropolitan and major regional centres.

We also acknowledge and support the Bill's proposal to streamline tourism operator permitting across protected areas. A more integrated permission system has the potential to reduce red tape, improve accessibility for tour operators, and support new and diverse tourism experiences. These reforms will benefit Queensland's caravan parks by encouraging increased visitor activity and longer stays, alongside the broader regional economic contributions of tourism.

We thank the Committee for its consideration of our views and remain available to provide any further evidence or clarification required.

Kind regards



Michelle Weston

Chief Executive Officer

Caravan Parks Association of Queensland

About Us

Caravan Parks Association of Queensland (CPAQ) is the peak industry body representing Queensland's caravan and residential parks. Our membership represents 325 parks across the state, spanning tourist parks, mixed-use parks accommodating both short- and long-term residents, and dedicated residential communities. Collectively, these parks provide essential accommodation infrastructure that supports Queensland's tourism economy, contributes to regional development, and plays an important role in the state's housing landscape.

As the trusted representative of the sector, CPAQ engages regularly with government and key stakeholders, advocates for practical and proportionate regulatory reform, and provides members with resources, education, and direct operational support. We have a deep understanding of the operational realities of caravan parks, including the management of small-scale sewage and water treatment systems, and are uniquely positioned to contribute constructively to regulatory reform processes.

Contact

For more information about this submission or to speak with us further about issues affecting caravan parks with onsite treatment plants, please contact:

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