

Address all communications to  
The Chief Executive Officer

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The Acting Committee Secretary  
Innovation, Tourism Development and Environment Committee  
Parliament House  
Cnr George & Alice Streets  
BRISBANE QLD 4000

Dear Madam,

**Re: Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Bill 2019**

I refer to the Parliamentary Committee's review of the abovementioned Bill recently introduced into the Queensland Parliament.

The Burdekin Shire Council is a proud Reef Guardian Council that supports the principle of protection of the Great Barrier Reef and the natural environment. We are at the forefront of innovative activities aimed at protecting our reef.

Council anticipated that any review of legislation surrounding protection of the Great Barrier Reef would involve a considered and scientific approach to the needs of the environment and local communities in the catchment of the reef. Unfortunately, the proposals seem to focus wholly towards protection of the reef with no regard for the impact on the community and the flow on effects from greatly increased administrative, energy, monetary and opportunity costs in supporting human populations in north and far north Queensland.

Council believes that the science being used to support some of the measures proposed is flawed. As a result, environmental gains appear to have been considerably over estimated. Therefore, the considerable negative effects resultant from the proposed policy and regulation changes will have a much higher unitary cost than might have been considered in the drafting of the legislation. Due to the limited consultation period allowed for the proposed Bill, this Council and other Councils are unable to provide a thoroughly considered response to the proposals, but we have prepared a list of issues that do not appear to have been adequately addressed and thought through by the Department of Environment and Science.

These issues include:

1. Adoption of economically and practically unsupportable levels for nitrogen and phosphorus in sewage effluent which may prevent environmental discharge after treatment, with no practical total nutrient removal solutions available. This will require councils to engage in offset schemes, which appear to be effectively shifting the administrative and regulatory burden of encouraging farmers to rehabilitate their lands and riparian zones to councils rather than the State.

2. The offset arrangements are not yet in place, meaning no-one can realistically estimate what might be involved in meeting the onus placed upon water service providers (WSPs) at this time. Without this quantifiable target, no one can reliably predict what the real economic and administrative cost of shouldering the burden will be in these cases. This should be clearly indicated to law-makers and affected parties before any legislation is enacted.
3. The level of actual nitrogen and phosphorus loads contributed by WSPs appears to be greatly overstated in the calculations used to support the changes. These have been disproven for quite some time now, yet the department continues to incorrectly calculate the nutrient footprint of WSPs, especially in the relationship they have to the non-point sources in their effect on the reef.

The Burdekin Shire Council would like to encourage the Committee to take a considered and supportable approach to the protection of the Barrier Reef and the human habitation of the reef's catchment. This should include the Department of Environment and Science being required to undertake genuine consultation over a suitable period, inclusive of the communities with the biggest stakes in the outcomes; give proper consideration to the ideas and concerns put forward by the representatives of these communities; and provide supportable evidence for the science they are relying upon to validate the heavy focus on point sources of WSP.

The Council requests that its submission be taken into consideration in the review of the proposed legislation.

Yours faithfully,



Terry Brennan  
**Chief Executive Officer**