



14 March 2019

Committee Secretary
Innovation, Tourism Development and Environment Committee
Parliament House
George Street
BRISBANE QLD 4000
Email: itdec@parliament.qld.gov.au

Dear Committee Secretary

Cement, Concrete and Aggregates Australia (CCA) is the peak industry body representing the \$15 billion-a-year heavy construction materials industry in Australia. Our members are involved in the extraction and processing of quarry products, as well as the production and supply of cement, pre-mixed concrete and supplementary materials. We welcome the opportunity to provide feedback on the *Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Amendment Bill 2019* (draft Bill).

The Queensland Extractive Industry

The Queensland extractive industry produces approximately 45 million tonnes of material per annum from hard rock, sand and river gravel quarries. The material is used for a range of local construction purposes, most particularly in concrete (made up of about 80% rock, sand and gravel), road base (made up of about 90% rock, sand and gravel) and a range of other applications, such as railway ballasts, landscaping, drainage, water filtration, and sporting fields.

- The vast majority of extractive materials are used *locally* (usually within a 60-80km radius) as transport of goods (usually by heavy vehicle) is expensive. The extractive industry is spread right across the State, particularly in areas closer to population settlement and where the geology is most suitable.
- Compared to other resource activities – quarrying has a relatively small footprint. For example, an average quarry is about 10% the size of an average coal mine.
- The industry has a diverse range of operators – from publicly listed or internationally-headquartered companies with integrated cement, concrete and quarrying operations, to small, family-based operations with 1-2 employees.

Comments on draft Bill

CCA recognises that the health of the Great Barrier Reef is very important for Queensland – not only for its iconic stature and significant biodiversity, but also for Queensland's economy through tourism and employment for which this industry provides the essential land based infrastructure.



CCAA understands that the legislation is focussed on reducing run-off from agriculture and direct sources of pollution from intensive land uses in order to protect the Great Barrier Reef. The heavy construction materials industry is very distinct from these industries and, as such, should not be captured under the proposed legislation changes due to reasons outlined below:

- Quarries are not a source of pollutant load, nor a high risk activity in relation to the Great Barrier Reef. The only potential pollutant is that of suspended solids derived from the quarrying process, however, waters that have the potential to carry these solids are closely managed on site. Compared to other sectors, quarry operations generally do not use fertilisers or other chemicals that cause nutrient run off.
- The extractive industry is already legislated and regulated through a range of Environmental Authorities (EAs) and Environmentally Relevant Activities (ERAs).
- Quarries operate in accordance with stormwater management plans that require operators to manage stormwater runoff on quarries through various engineered and/or procedural controls.
- The quarry sites that are in the Reef catchment areas are, in general, small regional quarries which provide material to their local area – not intensive or broad scale operations.

Set limits for nutrient and sediment loads in each of the Reef catchments

CCAA understands the draft Bill will provide for limits specific for each of the Reef catchments (at the river basin scale) based on the water quality targets in the Reef 2050 Water Quality Improvement Plan, and the limits are end-of-catchment, annual average volumes of nutrient and sediment pollution loads. CCAA also notes that there is to be no worsening of sediment loads from industry.

CCAA believes that additional clarification is required as to the intent of the proposed legislative criteria including:

- Regarding the new Chapter 4A, Part 5 S.87: Would this mean that any quarry within the Great Barrier Reef catchment be subject to the legislation?
- Would the proposed legislation impact on existing quarry approvals, or changes to current approvals; and how would new approvals be affected by the proposed legislation?
- Would the proposed strategy have the power to apply a Great Barrier Reef water quality offset condition as part of any new EA application, or application to amend an existing EA?
- How will the changes impact on the current DES stormwater guidelines in relation to sediment load requirements – ie will the current guidelines be sufficient to demonstrate compliance with the proposed legislation?

CCAA notes that if there was a requirement to provide water quality modelling, there may be significant feasibility and logistical issues associated with such additional studies.

***Catchment specific water quality targets proposed***

CCAA understands that there is catchment specific water quality targets proposed under the Reef Plan that show the main sources of pollutant loads – and quarrying is not one of them. Therefore, it is important, that quarries are not impacted by the proposed legislation, and that the focus should be on other industries of concern.

Water quality offsets

CCAA believes that additional clarification is also required regarding the matter of New Industrial Development, and any requirements to provide water quality offsets including:

- How will the Great Barrier Reef water quality offsets be calculated under the proposed framework? Under the current Environmental Offset Act framework, it is possible to calculate requirements for tree clearing (ie hectares cleared times multiplier), however, such a calculation would be much more difficult with water quality contaminant loads; and
- What is the current timeframe proposed by the State for release of the offsets policy for a Great Barrier Reef water quality offset; and release of environmental protection policy that “sets objectives for reduced contaminant loads”?

Thank you for the opportunity to provide comments on the Environmental Protection (Great Barrier Reef Protection Measures) and Other Legislation Bill 2019. To further discuss any of the issues raised in the submission, please contact Cassandra Koutouridis on [REDACTED] or [REDACTED]

Yours sincerely

A handwritten signature in black ink, appearing to read 'Aaron Johnstone', with a long horizontal flourish extending to the right.

Aaron Johnstone
CCAA State Director – Queensland

