



**Gladstone Ports Corporation**

*Growth, Prosperity, Community.*

Our Ref: #1489186

15 March 2019

A/Committee Secretary  
Innovation, Tourism Development and Environment Committee  
Parliament House  
George Street  
Brisbane Qld 4000  
Email: itdec@parliament.qld.gov.au

To whom it may concern

**RE: GLADSTONE PORTS CORPORATION SUBMISSION ON THE *ENVIRONMENTAL PROTECTION (GREAT BARRIER REEF PROTECTION MEASURES) AND OTHER LEGALISATION BILL 2019***

Gladstone Ports Corporation (GPC) as a land owner and operator of the Port of Bundaberg, the Port of Rockhampton and the Priority Port of Gladstone, appreciates the opportunity to review and comment on the *Environmental Protection (Great Barrier Reef Protection Measures) and other legalisation Bill 2019* (the Bill). GPC's Port locations relate to the Fitzroy, Calliope, Boyne and Burnett catchments and the Great Barrier Reef World Heritage Area. The following comments on the Bill and Explanatory Notes (the notes) are made for your consideration.

**Explanatory Notes**

There are challenges in understanding the full implications of the proposed regulation. Primarily, it is not clear how activities other than agriculture (e.g. industrial, mining activities, sewage treatment plants, land-based aquaculture and waste disposal) will be impacted. In particular, how the water quality targets will be applied to non-agricultural, industrial sector Environmentally Relevant Activities (ERAs).

**Policy objectives and the reasons for them**

The Bill responds to the 2016 recommendations from the Great Barrier Reef Water Science Task Force. However it is not clear how the Bill interacts with other regulatory tools that implement the Reef 2050 Long-Term Sustainability Plan (the Reef 2050 plan), in particular the *Sustainable Ports Act 2015* and the subsequent Priority Port Master Plans, as well as existing State and Federal offset legislation.

**Regulatory requirements – agricultural and industrial sector**

This section of the notes makes specific reference to additional requirements for point source industrial activities that release nutrients and sediments to waters. There is currently no indication of what these additional requirements will be and how they will be applied to industrial sector activities where there are already regulations and best practice guidance in place. The notes acknowledge that these industries are not the main source of nutrient and sediment contributions to the Reef catchment.

The broadening and enhancing of Reef protection regulations, *Decision Regulatory Impact Statement*, February 2019, contains a costs and benefits analysis. This analysis does not yet offer an

understanding of the cost implications for potentially impacted activities that are not agricultural, sewerage treatment or banana cropping.

#### **Section 74**

This section indicates that amendments will be made to the *Environmental Protection Act 1994* in order to improve the quality of water entering the Great Barrier Reef. It is not clear how the water quality targets for each catchment area will be applied to non-agricultural, industrial sector activities. Therefore the potential implications to our business is currently difficult to discern. Additionally it is not clear how the current 2025 water quality reduction targets have been reached.

#### **Section 77 – Environmental protection policy**

The notes discuss specific details around the introduction of agricultural ERAs however they do not nominate how the objectives for reduced contaminant loads to improve the quality of water entering the Great Barrier Reef will be applied to non-agricultural, industrial sector activities.

It is important to note that there are existing water quality objectives for the Fitzroy, Calliope, Boyne and Burnett catchment areas under the *Environmental Protection (Water) Policy 2009*. It is requested that GPC and/or the QPA are included in the consultation process associated with the amendment of this policy.

#### **Part 3 – Requirements for carrying out agricultural ERA's**

Whilst this section focuses on defining and categorising agricultural ERAs, it does not appear to identify impacts on non-agricultural, industrial sector activities. It is GPC's understanding that the regulation is relevant to land-based ERAs. The proposed water quality targets would therefore not be applied to ERA 16, where it relates to dredging. Dredging is subject to other initiatives implemented under the Reef 2050 plan framework.

#### **Section 88 – Application of Environmental Offsets Act 2014 to Great Barrier Reef water quality objectives**

Consideration should be given as to how this Bill will interact with the current review of Queensland's environmental offsets framework to ensure they function cohesively together.

GPC would like to express interest in being part of ongoing consultation regarding this Bill and associated amendments to other legislation. GPC is particularly interested in achieving clarity for non-agricultural activities impacted by the Bill. GPC also recommends the QPA as the Peak Body for Queensland Ports as a useful stakeholder for ongoing consultation. Ports are also able provide important linkages with other industries who operate on Port land.

GPC welcomes the opportunity to discuss this feedback further. Please do not hesitate to contact Environment Manager (Acting) Kylee Lockwood on [REDACTED] or [REDACTED]

Yours faithfully



**Anthea Bennett**

**(Acting) Manager Planning and Development**