

# Sunshine Coast Waterways Authority Bill 2026

**Submission No:** 038

**Submission By:** Take Action for Pumicestone Passage

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## SUNSHINE COAST WATERWAYS AUTHORITY BILL 2026

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### SUBMISSION DETAILS

**Organisation:** Take Action for Pumicestone Passage (TAPP Inc.)

**Representative:** [REDACTED]

**Email:** [REDACTED]

**Phone:** [REDACTED]

Take Action for Pumicestone Passage (TAPP) is a community-led environmental advocacy organisation focused on protecting the ecological integrity, water quality, and long-term resilience of the Pumicestone Passage and its connected waterways, including Coochin Creek and associated catchments.

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### 1. EXECUTIVE SUMMARY

TAPP supports the intent of establishing a coordinated waterways authority. However, the current Bill requires **critical strengthening** to ensure it functions as a framework for **ecological protection and improved management**, rather than simply consolidating existing practices.

The Pumicestone Passage is directly connected to a **Ramsar-listed wetland system**, making it nationally and internationally significant. Governance arrangements must reflect this status. This submission identifies key gaps in the Bill and provides targeted recommendations to ensure:

- Ecological integrity is prioritised
  - Cumulative impacts are addressed
  - Governance is transparent and accountable
  - Community and catchment-level knowledge is embedded
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### 2. OVERARCHING PRINCIPLE: ECOLOGICAL INTEGRITY AS A BASELINE

While the Bill promotes “balanced” outcomes, it does not clearly establish **ecological protection as a non-negotiable baseline**.





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#### **Position of Take Action for Pumicestone Passage:**

Waterway management must ensure:

- No decline in ecological condition
- Active improvement where degradation exists

#### **Recommendation:**

Amend the Bill to require that all management actions:

- Maintain or improve ecological health
- Apply the **precautionary principle** where uncertainty exists

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### **3. ALIGNMENT WITH THE EPBC ACT (CRITICAL OMISSION)**

The Bill currently fails to explicitly recognise the **Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)** under *Part 1, Section 4 – Relationship with Other Acts*.

#### **Why this matters:**

- The Pumicestone Passage connects to a **Ramsar-listed wetland**
- Impacts may affect **Matters of National Environmental Significance (MNES)**
- Federal environmental obligations must be embedded in governance

#### **Recommendation:**

- Amend the Bill to explicitly include the EPBC Act
- Require referral and consideration where MNES may be impacted. It is inconsistent to recognise the international significance of the Passage without embedding the primary federal legislation designed to protect it.

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### **4. CUMULATIVE IMPACTS (KEY LEGISLATIVE GAP)**

The Bill does not adequately require assessment of **cumulative environmental impacts**.





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### **Position of Take Action for Pumicestone Passage:**

Cumulative impacts from multiple activities are a primary driver of ecological decline in coastal systems.

### **Recommendation:**

Legislate a requirement to assess cumulative impacts across:

- Dredging
- Infrastructure works
- Vessel activity
- Catchment inputs

This must apply to both:

- Strategic planning
- Operational decision-making

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## **5. ECOLOGICAL RISK ASSESSMENT (MANDATORY REQUIREMENT)**

### **Recommendation:**

Require **ecological risk assessments prior to all management activities**, including:

- Dredging
- Shoreline works
- Infrastructure installation

This aligns with best-practice environmental governance and ensures decisions are:

- Evidence-based
- Defensible
- Transparent

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## **6. MONITORING, EVALUATION AND TRANSPARENCY**

Effective management requires robust monitoring frameworks.





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**Recommendation:**

The Bill must mandate:

- Use of **scientifically robust ecological indicators**
- Public access to monitoring data
- Transparent reporting and review mechanisms

Monitoring should include:

- Water quality (e.g. E. coli, nutrients, pH)
- Sediment dynamics
- Habitat condition
- Biodiversity

TAPP's on-ground experience, including independent water quality testing, highlights the importance of **consistent and transparent monitoring frameworks**.

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## **7. MANAGEMENT OF EXISTING INFRASTRUCTURE (BALANCED APPROACH)**

Take Action for Pumicestone Passage recognises the need for:

- Maintenance dredging
- Navigation safety
- Revetment and shoreline protection
- Beach nourishment (e.g. Golden Beach)

However, current approaches must not simply continue without review.

**Position of Take Action for Pumicestone Passage:**

Existing management practices must be:

- Reviewed
- Scientifically assessed
- Improved over time

**Recommendations:**

- Review effectiveness of current dredging and nourishment practices
- Assess ecological impacts and long-term sustainability





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**Recommendations (continued):**

- Investigate and prioritise management approaches that align with natural sediment transport processes
- Reduce long-term reliance on repeated artificial interventions, including beach nourishment, where sustainable alternatives exist

**The continued need for recurrent intervention indicates that existing management approaches are not optimally aligned with natural coastal processes and require strategic review.**

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## **8. FISH HABITAT AREAS AND SAND EXTRACTION**

Activities within declared Fish Habitat Areas (FHAs) must be carefully managed.

**Recommendation:**

- Require scientific justification for sand extraction
  - Ensure ecological values are prioritised
  - Integrate FHA considerations into cumulative impact assessments
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## **9. GENUINE LOCAL INPUT AND CATCHMENT-BASED GOVERNANCE**

The Bill references “greater local input” but does not sufficiently embed this.

**Recommendation:**

Amend the Bill to require:

- Consultation with:
  - Catchment Management Groups
  - Traditional Custodians (Gubbi Gubbi, Kabi Kabi and Joondoburri People)
- Establishment of **catchment-based subcommittees**
- Integration with existing Catchment Management Plans





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Local stakeholders provide:

- Place-based knowledge
- Early identification of issues
- Community representation

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## 10. CLARITY ON JURISDICTION AND RESPONSIBILITY

The Bill lacks clarity on:

- Geographic boundaries
- Roles across State and Local Government
- Responsibility for dredging and maintenance

### **Recommendation:**

Clearly define:

- Jurisdictional limits
- Decision-making authority
- Funding responsibilities

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## 11. BOARD COMPOSITION AND GOVERNANCE INTEGRITY

### **Recommendation:**

Board composition must include:

- Sunshine Coast Council
- Noosa Council
- Traditional Custodians of the region
- University of the Sunshine Coast

And:

- Independent environmental expertise
- Community representation





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This ensures:

- Balanced decision-making
- Scientific credibility
- Public trust

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### **12. STRATEGIC OPPORTUNITY FOR REFORM**

The establishment of the Sunshine Coast Waterways Authority presents a critical opportunity to:

- Undertake a comprehensive review of existing management practices
- Align decision-making with contemporary scientific evidence and best-practice coastal management
- Deliver measurable improvements in long-term ecological outcomes

**The Authority must not function solely as a mechanism for continuing existing practices, but as a framework for their systematic review, improvement, and reform.**

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### **13. CONCLUSION AND REQUEST TO APPEAR**

The proposed Sunshine Coast Waterways Authority has the potential to significantly improve the governance and management of the region's waterways. However, without targeted legislative strengthening, there is a material risk that the Authority will:

- Prioritise administrative efficiency over ecological integrity
- Continue existing management practices without sufficient review
- Fail to adequately assess cumulative environmental impacts

This presents a critical opportunity to align waterways management with contemporary science, robust governance, and long-term ecological sustainability.

Take Action for Pumicestone Passage urges the Committee to adopt the recommendations outlined in this submission to ensure the Authority delivers improved environmental outcomes, rather than perpetuating existing practices. We respectfully request the opportunity to appear before the Committee at the public hearing to:

- Provide evidence in support of this submission
- Contribute local, place-based knowledge from the Pumicestone Passage catchment

