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**Attention:** Prue Leng - Stakeholder Relations Advisor

**Email:** [prue.leng@sunwater.com.au](mailto:prue.leng@sunwater.com.au)

**Date:** 2<sup>nd</sup> November 2023

**Re: Submission to the draft Bundaberg and Burnett Regional Water Assessment**

Dear Prue,

As the states peak environment non-government organisation, the Queensland Conservation Council (QCC) welcomes this opportunity to provide the following comments and recommendations regarding the draft Bundaberg and Burnett Regional Water Assessment (BBRWA).

## **1. Comments and recommendations**

### **1.2 Failure to consider all non-infrastructure options**

According to Figure 1 on page 3 of the draft BBRWA, a key strategic objective of the RWA program is to *“consider non infrastructure options including improving the efficiency of existing water supply schemes and maximising the benefit from existing water resources and infrastructure.”*

Despite it being a strategic objective of the RWA program, the draft BBRWA has not assessed all potential non infrastructure solutions, such as implementing actions to reduce future demand for water and to improve the efficiency of existing water supply infrastructure, both of which have the potential to save a considerable volume of water that could be used to underpin new economic development at a small fraction of the economic and environmental costs of building new water supply infrastructure.

As they could potentially deliver a substantial volume of water that could be utilised to support new economic development at a fraction of the economic and environmental cost of building new water supply infrastructure, QCC strongly recommends that a detailed assessment is undertaken as part of the BBRWA to determine the volume of water that could be provided by implementing robust demand management and improved water use efficiency measures across the BBRWA region.

**Recommendation:**

- Undertake a detailed assessment of the volume of water that could be potentially provided by implementing robust demand management and improved water use efficiency measures across the BBRWA region.

## **1.2 Economic viability of shortlisted options**

In order to be economically viable, water supply infrastructure and other types of development proposals must have a minimum Benefit Cost Ratio (BCR) of 1. Despite this fundamental economic principle, the draft BBRW contains several proposed water supply infrastructure projects that have a BCR of substantially less than 1.

As they are clearly not economically viable with having BCR's of less than 1, its QCC's strong view that the water supply options in the draft BBRWA with BCR's less than 1 should not be included in the final BBRWA.

**Recommendation:**

- Do not include water supply options with a BCR less than 1 in the final BBRWA

## **2. Conclusion**

Please do not hesitate to contact me should you require any further information or clarification regarding the matters raised in this submission.

Yours sincerely,



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