

Our Ref: L.SQIDEP.001

3 February 2022

RE: SQIDEP SUBMISSION BY OCEAN PROTECT

The purpose of this correspondence is to advise our clients and other industry stakeholders that, on 31 January 2022, Ocean Protect submitted three (3) of our most commonly applied stormwater treatment solutions for review against Stormwater Australia's "Stormwater Quality Improvement Device Evaluation Protocol" (SQIDEP). The solutions submitted are:

- OceanGuard®
- StormFilter®
- Filterra® biofiltration.

The key reason for this decision was the recent correspondence to Ocean Protect (on 6th December 2021) from Brisbane City Council, advising that all proprietary stormwater treatment assets will require a Stormwater Australia SQIDEP Verification Certificate to be applied within new development in Brisbane City. This requirement is part of Council's *Citywide amendment - planning scheme policy - Amendment package*¹. It is our understanding that Council will continue to accept the use stormwater treatment assets currently verified as suitable by Council until 10 December 2023.

This decision by Brisbane City Council has been made despite Council being advised by Ocean Protect, key regulators and other industry stakeholders (e.g. Stormwater Queensland², Stormwater NSW³) that SQIDEP (in its current form) has significant deficiencies which, if allowed to remain without amendment, will produce exaggerated or over-estimated treatment performance results for SQIDs – and, ultimately, reduced 'actual' protection of Brisbane's waterways. As Brisbane City Council is a major regulator within Australia, we believe their decision will also limit the likelihood that known technical deficiencies within SQIDEP will be soon resolved, and SQIDEP verifications will continue to be given limited value by regulators and industry stakeholders external to South-East Queensland.

¹ Brisbane City Council, 2021, *Citywide amendment - planning scheme policy - Amendment package N*. <https://www.brisbane.qld.gov.au/planning-and-building/planning-guidelines-and-tools/brisbane-city-plan-2014/amendments-to-city-plan-2014/city-plan-amendments-in-progress/citywide-amendment-planning-scheme-policy-amendment-package-n>

² Stormwater Queensland, 2021, *SQIDEP Update*, <http://stormwaterqueensland.asn.au/advocacy/sqidep/>

³ Stormwater NSW, Letter sent to Stormwater Australia, 14 August 2019, <https://stormwaternewsw.asn.au/wp-content/uploads/2019/09/Stormwater-NSW-Comments-and-Advice-on-SQIDEP.pdf>

Ocean Protect have installed over ten thousand stormwater treatment assets within Brisbane City, and will continue to help protect Brisbane's waterways. To do this, however, we must comply with Brisbane City Council's requirements and obtain a SQIDEP Verification Certificate.

Ocean Protect have, however, requested that the aforementioned stormwater treatment solutions be reviewed by Stormwater Australia using additional criteria requested to be included in SQIDEP by key industry stakeholders, including Blacktown City Council, Stormwater NSW, Stormwater Queensland and Ocean Protect. Specifically, this criteria is in relation to sequential events (to avoid 'cherry picking' of events) and a minimum average dissolved inorganic nitrogen (DIN) percentage (of total nitrogen).

If you have any questions or would like to discuss anything further, please do not hesitate to contact me or one of our Ocean Protect team members.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Michael Wicks', with a stylized flourish at the end.

Michael Wicks
Technical Director