QUEENSLAND FARMERS' FEDERATION

Whitsunday Water Plan Review
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Prepared for
Department of Local Government, Water and Volunteers

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This submission is provided to:

Department of Local Government, Water and Volunteers

Submitted via email: **NorthWPS@dlgwv.qld.gov.au**

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About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide comment to the Department of Local Government, Water and Volunteers on the Whitsunday Water Plan review. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Executive Summary

The Whitsunday region has long demonstrated its suitability and success in producing sugarcane, horticultural crops and mixed farming systems that drive regional employment, local investment, and high-value exports. Reliable and efficient access to water underpins the success of the region and remains fundamental to safeguarding Queensland's food security.

The review of the Whitsunday Water Plan provides a timely opportunity to strengthen water reliability, improve local monitoring and data transparency, and support on-farm investment in storage and efficiency infrastructure. A fit for purpose plan that protects existing users, improves flexibility and provides clear pathways to access new water will be essential to achieving Queensland's Prosper 2050 and $30 billion agricultural production goals, while maintaining the long-term prosperity and resilience of the region.

Through consultation with local growers, QFF understands that the review must deliver practical reforms that improve reliability and ensure management arrangements remain responsive to the variable flow conditions characteristic of the Whitsunday region.

Introduction

The Whitsunday region supports highly productive agricultural land sustained by local water resources, including the O'Connell and Andromache Rivers. The variable flow of these river systems typically respond quickly to rainfall and seasonal conditions, often moving from short, high-flow events to extended dry periods. The behaviour of these systems highlights the need for flexible, regionally specific management arrangements that can adapt to changing conditions, allowing growers to make the most of available flows while maintaining environmental balance and long-term sustainability.

The current review builds on the findings of the most recent performance assessment, which identified opportunities to improve data transparency, monitoring and adaptive management across the plan area.

As a part of the review, the Department has proposed an expansion of the Water Plan footprint to include additional sub-catchment and management areas. QFF notes the concerns raised by local growers regarding the proposed extension and recommends the Department provide a clear rationale outlining the purpose, scope and expected benefits of the change to ensure management arrangements remain regionally appropriate and practical for water users.

Volumetric Conversion

The potential conversion of area-based licenses to volumetric allocations in the O'Connell and Andromache systems remains a key concern for growers. These variable flow rivers can change rapidly, making permanent metering technically difficult, costly and, in some instances unsafe.

Before any transition is considered, growers need a clear understanding of what a move from licences to allocations would mean for their operations. Many farmers have expressed uncertainty about how volumetric conversions could affect their reliability of supply, compliance requirements, and ongoing management costs.

To support informed decision-making, the Department should provide information and extension materials that explain the intent of the proposal, how allocations would be administered, and the potential implications for individual licence holders. This would allow growers to participate constructively and assess whether a conversion model is appropriate for their system.

QFF recommends:

- The Department undertake a full feasibility and cost-benefit assessment before progressing any conversion to a volumetric allocation framework.

- The Department develop targeted communication and learning materials to help growers understand the intent, process and implications of a potential move from licenses to allocations.

Environmental Flow Rules

Growers have raised concerns about the current environmental flow rules for the O'Connell and Andromache Rivers. Existing thresholds and trigger mechanisms often restrict access even when adequate flow is available and environmental connectivity has already been achieved. These constraints limit irrigation opportunities during short flow events that are vital for crop establishment and productivity.
Recent performance findings also indicated that management arrangements could better response to real-time data and hydrological conditions.

Further clarification is also needed on how connectivity between surface water and groundwater systems will be assessed and managed under the updated plan, supported by improved access to local hydrological data and monitoring information to strengthen transparency and decision-making. Strengthening data transparency and accessibility will help growers plan water use more effectively and build confidence in the plan's implementation.

QFF recommends:

- Review environmental flow thresholds for the O'Connell and Andromache Rivers using updated hydrological and operational data.
- Introduce adaptive management triggers that maintain environmental outcomes while enabling access to opportunistic flows.
- Clarify how surface water and groundwater connectivity will be managed under the new plan, supported by improved access to local monitoring data.

Unallocated Water and Storage Flexibility

Access to unallocated water remains a major issue for irrigators across the region. QFF acknowledges and welcomes the Department's recent call for Expressions of Interest (EOI) to bring unallocated water to market, noting growers continue to seek clarity around the timing, allocation volumes and process transparency.

Recent performance review findings indicated that while environmental outcomes are being met, water use remains below the plan's full allocation potential. A clear and transparent process for the staged release of unallocated water would provide greater certainty for investment, encourage productivity, and improve overall utilisation of available resources.

Supporting off-stream storage development and allowing the transfer of take to storage will also improve reliability, reduce pressure on rivers and enhance drought resilience

ensuring water is available to sustain crops, maintain food supply and support Queensland's food security.

QFF recommends:

- Progress the staged release of unallocated water through a transparent, time-bound process aligned with regional demand.
- Continue to expand the EOI process to provide greater clarity on eligibility, timing and allocation volumes.
- Support off-stream storage development and license transfer to improve reliability and drought resilience.

Sediment Traps and On-Farm Reuse

Through consultation with growers the 20ML limit on sediment traps and recycle pits is restrictive and should be considered for review to align with best practice in water management. Larger sediment traps improve water quality, reduce runoff and enhance on-farm efficiency.

QFF recommends:

- The Department review sediment trap capacity limits to align with best-practice design.
- The next iteration of the Water Plan enable provisions to encourage investment in on-farm recycling and reuse systems that deliver environmental and efficiency benefits.

Conclusion

Agriculture in the Whitsunday region is vital to Queensland's food security, regional employment and export strength. The review of the Whitsunday Water Plan is an opportunity to modernise management arrangements and give growers the certainty to invest in water efficiency, storage and production.

Delivery of the review should provide clear information and engagement for growers, establish transparent pathways to access unallocated water, improve environmental flow rules, and support flexible management of variable flow systems will ensure the plan delivers balanced outcomes that sustain both agricultural growth and environmental health across the Whitsunday region.

Yours sincerely

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