

08 May 2015

Rachel Barley
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c/ - Rachel.Barley@dnrm.qld.gov.au

Dear Rachel,

Re: Draft National Groundwater Strategic Framework 2015-2025

Thank you for the opportunity to provide comment on the *Draft National Groundwater Strategic Framework 2015-2025* (the Framework). This is a joint submission by Queensland Farmers' Federation (QFF) and its member body Cotton Australia (CA).

As organisations that rely heavily on both surface and groundwater resources, we recognise the absolute importance of effective management of our groundwater resources.

Unfortunately, both in Queensland and in other jurisdictions there are far too many historical examples of mismanagement of the resource, often through over allocation; the Condamine Alluvium being just one.

It is absolutely important that these past mistakes are not repeated, and this Framework should play an important role in ensuring they are not.

Prior to addressing some of the more substantive issues, we would like to make a comment on the map that appears on Page 5 of the Framework. While it is probably a relatively accurate portrayal of groundwater dependence, we caution that it should not be not used as a proxy for identifying key areas when adopting a risk management approach.

For example, a superficial look at the map, would suggest ground water use is very low on the Darling Downs (and it is compared to surface water use), however, the Condamine Alluvium is a highly developed groundwater system, with known challenges and its health and sustainability should be considered paramount.

Please find following, brief comments on three key objectives.

1. Sustainable extraction and optimal use

- Recognising that all governments and groundwater users have limited resources, we support the adoption of a risk base approach, with resources focused on areas of high or growing

demand, and where there are demonstrable risks to sustainability, or where there is the capacity and demand for increased development.

- There should be no additional groundwater rights allocated in areas where such allocation will have a negative impact on existing users in either terms of entitlement or allocation.
- Where additional groundwater can be made available for extraction, there should be a transparent process that allows for open allocation of the available entitlement.
- “Optimal use” should be decided through the “market”, both at initial allocation, and through subsequent trade opportunities.
- When making new entitlement available, government should be cautious; only making water available in accordance with the resource’s “sustainable yield”. Where there is reasonable doubt about the “sustainable yield”, a very conservative approach to entitlement allocation should be adopted.
- We have always held very serious concerns around Queensland’s approach to managing groundwater extraction associated with resource industry development. While we recognise that Queensland has taken a number of measures to monitor and mitigate impacts, the fact that extraction is allowed outside the concept of “sustainable yield” is completely at odds with the principles rightly applied to other industries.
- Given the above, if the Queensland Government is not prepared to bring resource industry extraction into the “sustainable yield” framework, then it must ensure that all groundwater taken by the resource industry as co-produced water is treated to required standards and made available for re-use.
- We believe that the Great Artesian Basin “Cap and Pipe” scheme represents what is probably the best opportunity to achieve widespread sustainable extraction across Queensland, and strongly recommend that it should be a priority and well-funded action by both the Queensland and Federal governments.
- As a general principle, we support the notion that all extraction should be metered and monitored. However, we are also aware that there is significant practicality and cost issues associated with metering and monitoring small users such as Stock and Domestic. Therefore, we believe a priority for the Queensland Government should be to effectively model groundwater use across key areas in the State, and implement metering of stock and domestic, if and when, it can be demonstrated the extractions are close to matching sustainable yield, or when uncertainty about current extraction is limiting further allocation.
- Where metering and monitoring is in place, there must also be the resources to allow for the appropriate analysis of the collected data and the early recognition of any negative trends concerning sustainability.

2. *Providing investment confidence*

- The key to investment confidence is having a management framework that ensures that existing allocations are protected from any third party impacts on entitlement or reliability.
- As mentioned above, when doubt exists about the “sustainable yield”, then adopt a conservative approach to issuing new allocations.
- Post initial allocation, it is imperative that the “market” allows an active and efficient market system for movement of water rights.
- While a market based system that allows for efficient and timely transfer is essential, it should also be recognised that the “market” is small, and therefore systems and sophistication should be appropriate.

- We are aware of interest at a federal level to develop a trading regime for trade between surface and groundwater resources. While we understand there are some very specific examples where this does occur, we do not believe this is a priority area, and therefore does not require allocation of resources.
- Where additional water rights are available for allocation, it should be done in a transparent and open manner.
- Water accounting and account management rules should be designed to offer maximum flexibility, without impacting on sustainability.
- As much as possible there should be full accounting and open reporting of groundwater use.
- While groundwater and surface water use and availability cannot be looked on in isolation from each other, we are very cautious of conjunctive use licences, and believe they need very careful consideration, to ensure they do not unnecessarily impact on other entitlement holders.
- There should be full accounting and reporting of all extraction resource industry extraction.

3. Planning and managing now for the future

- We support greater understanding of the interaction between groundwater and surface water, along with more in-depth knowledge of our groundwater resource.
- To achieve the above, we support the on-going professional development of groundwater experts, but all work and priorities must be based on the risk approach, with resources focused in a cost effective manner, with the knowledge gained being of practical use for the sustainable management of the resource.

Many thanks for the opportunity to provide comment.

Yours sincerely,

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Cotton Australia

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