

3 March 2015

Interagency Working Group on Commonwealth Water Information Provision  
Bureau of Meteorology  
GPO Box 2334  
Canberra ACT 2601

Dear Mr Prosser,

**RE: Commonwealth water information provision**

Thank you for the opportunity to provide a response to the Interagency Working Group. QFF would like to respond to Item 3 of the Terms of Reference for the investigations ie 'Options to reduce regulatory burden imposed on data providers in the order of 20 percent or more compared to current regulatory burdens.'

Your letter indicates that you are seeking specific suggestions about how to reduce regulatory burden. QFF's concerns relates to the burden we are expecting to be imposed in the development and implementation of catchment plans within the Queensland Murray Darling. We cannot quote specific evidence at this stage as the plans are under development between the Authority and Queensland Government agencies and particularly the Department of Natural Resources and Mines. QFF is briefed by DNRM from time to time about issues and progress with catchment planning. This advice confirms our long held concerns that the planning processes being implemented by the Authority will far exceed the processes necessary to effectively manage flow based regimes in the Queensland Murray Darling catchments.

QFF and irrigator groups have raised this issue frequently during the development of the Basin Plan and consultations undertaken by the Authority from time to time since the Plan was finalized. It would appear that it is the intention to proceed regardless of this advice.

QFF would expect that implementation of a planning process suited to our Northern Basin catchments could ensure that an excessive regulatory burden was not put in place without any detriment to the achievement of catchment planning outcomes. If it is decided to make no change to the approach at this stage, the planning process must be subject to independent review in regard to need and efficiency within three years. This review should also be triggered if there is any intention of trying to recover the costs of planning from water users.

Yours Sincerely,

Dan Galligan  
QFF CEO

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