

10 February 2015

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Burdekin River Irrigators
Area Committee

**Emerging Primary
Industries Groups**

- Australian Organic
- Queensland Aquaculture
Industries Federation

Chief Executive
Attention: Water Planning Project Officer
Department of Natural Resources and Mines
PO Box 156
Mareeba QLD 4880

c/- WRP Gulf@dnrm.qld.gov.au

Dear Sir,

RE: Submission on Draft Gulf water resource and resource operations plans

QFF welcomes the opportunity to make a submission on the Gulf Draft Amended Plans which investigate whether additional unallocated water can be made available in the Flinders and Gilbert catchments to the reserves provided for in the initial Gulf Water Resource Plan released in November 2007. There have already been releases of unallocated water from the existing reserves held in Gulf catchments for both irrigation and town use. In addition, the CSIRO Flinders and Gilbert Agricultural Resource Assessment released in early 2014, identified a significant additional unallocated water potential to support long term agricultural development and in particular large scale irrigation development in both catchments.

QFF supports the review of the Gulf Water Resource Plan to examine and confirm additional water reserves for development in the Flinders and Gilbert catchments. However, it is important that the potential risks of irrigation development in these catchments is adequately investigated as part of this review.

Fisheries assessments and investigations of ecological assets and river flows undertaken as part of the review indicate that a volume of 266GL of new water harvesting could be made available in the Flinders catchment and 489GL preferably for water harvesting could be made available in the Gilbert provided adequate mitigation strategies are put in place. These are reduced volumes of water to the volumes identified by the CSIRO. The mitigation strategies relate primarily to the management of stream flows (low, medium and high) and over bank flooding. It would appear that the performance indicators and objectives and particularly the environmental flow objectives (mean and median) for both the Flinders and Gilbert catchments are conservative to reflect the environmental risks. The provisions to maintain wet season flow performance and pass flow conditions for entitlements granted from the general reserve are also important. QFF supports these recommendations but recognises the need to keep the implementation of Plan in terms of these performance indicators under review in both catchments.

Variability of water availability will be a major factor for irrigation development and particularly large scale development in the Gulf. The concern for existing and future smaller irrigators is the impact that a large project may have on availability of water at key times of the season and from season to season. The draft Plan makes it clear that 266GL in the Flinders and 489GL in the Gilbert are the assessed annual volumetric limits of future water entitlements but the volume that can be extracted at any time will be subject to water availability, entitlement conditions and infrastructure either on-farm or instream (dams or weirs). The draft Plan allows for increased water harvesting thresholds for new water harvesting developments which should at least provide some protection for existing water entitlement holders. Trading arrangements under the draft resource operations plan are to allow for permanent and seasonal trading of entitlements granted from the general reserve. Provisions in relation to stock and domestic use are noted.

Overall, QFF supports the proposals in the draft amended Plans to make significant quantities of water available in the Flinders and Gilbert catchments for irrigation developments. Conditions proposed to be imposed should allow for irrigation development in both catchments without a risk to environmental needs in the Gulf catchments and Gulf fisheries.

Yours Sincerely,

Dan Galligan
QFF CEO