



# QUEENSLAND FARMERS' FEDERATION

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## Submission

23 February 2017

Basin Plan amendment submissions  
Murray-Darling Basin Authority  
GPO Box 2256  
CANBERRA ACT 2601

Via email: [submissions@mdba.gov.au](mailto:submissions@mdba.gov.au)

Dear Sir/Madam

### Re: Proposed Basin Plan Amendments for the Northern Basin

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of 15 of Queensland's peak rural industry organisations, which in turn collectively represent more than 13,000 primary producers across the state. QFF engages in a broad range of economic, social, environmental and regional issues of strategic importance to the productivity, sustainability and growth of the agricultural sector. QFF's mission is to secure a strong and sustainable future for Queensland primary producers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland
- Queensland Chicken Growers Association
- Queensland Dairyfarmers' Organisation
- Burdekin River Irrigation Area Irrigators
- Central Downs Irrigators Ltd
- Bundaberg Regional Irrigators Group
- Flower Association
- Pioneer Valley Water Cooperative Ltd
- Pork Queensland Inc.
- Queensland Chicken Meat Council
- Queensland United Egg Producers
- Australian Organic

QFF welcomes the opportunity to formally respond to the Murray-Darling Basin Authority's (MDBA) review of the northern Basin water recovery target. QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

*The united voice of intensive agriculture*



## Summary

**QFF rejects any further removal of water from the northern Basin beyond the existing 278 GL that has already been recovered for the Murray-Darling Basin Plan.**

**The MDBA is proposing that the water recovery target be reduced from 390 GL to 320 GL, provided there are commitments from the Australian, Queensland and New South Wales Governments to implement a range of measures aimed at improving water management in the north. However, to date, these commitments have not been secured.**

**From the MDBA's own figures, the proposed 320 GL water recovery target will result in the loss of approximately 450 further jobs from the communities of the northern Basin. This is unacceptable. Any further water recovery will also reduce the overall viability of irrigated agriculture and the associated industries and communities in the impacted region.**

## Background

QFF notes that the need to review the target was identified in 2012 when the Basin Plan was passed in recognition that knowledge of some northern areas was not as well developed as others. The three-year review involved substantial new research into socio-economic, hydrology and environmental aspects of the northern Basin which QFF has reviewed.

QFF also notes that at the time the Basin Plan was established, it was identified that there was a need to review the sustainable diversion limits (SDLs) of three groundwater areas. As the SDLs for groundwater are only in New South Wales and Victoria, QFF has not commented on these proposed amendments.

Research and accordingly the Basin Plan review focused primarily on surface water issues in the Lower Balonne and downstream. However, this submission deals with the implications of the revised surface water recover targets for all Queensland Murray-Darling catchments.

## Response to the proposed 320 GL target

The MDBA's proposal to reduce the water recovery target from 390 GL to 320 GL is stated to minimise socio-economic impacts in northern Basin communities while delivering almost equivalent environmental outcomes by taking a more targeted approach to water recovery.

QFF questions this approach, particularly as this reflects a 'flow-based approach' as opposed to an 'events-based approach', which would be more suitable to ensure environmental benefits to the Basin. While the MDBA's review documents support a range of similar environmental outcomes, the socio-economic impacts associated with further water buybacks are unacceptable – up to 35 per cent job losses in one community.

QFF considers that any further job losses in regional areas are unacceptable. This is in line with the MDBA-funded research contained within the Regional Wellbeing Survey, which shows that these communities already have very low levels of personal and community wellbeing, and that both of these indicators are in decline. Any policy decision that puts further strain on these communities is undesirable and will continue to negatively impact the future of both agriculture and community in these areas.

Queensland's irrigated agriculture sector is unconvinced that simply recovering more water will increase the environmental sustainability of the Basin. The sector supports the MDBA's recommendation to invest in measures to maximise the environmental outcomes from the management of environmental

water. In planning for and implementing these measures, it is paramount that the reliability of water entitlements is maintained.

Should the MDBA uphold the proposed 320 GL recovery limit, QFF suggests the following issues must be adequately addressed as a priority and prior to any recovery.

### ***No Mandatory Removal of Water***

The future of the buyback of irrigation entitlements from ‘willing sellers’ is in doubt with many of the willing sellers now removed from the market. In these cases, prime agricultural land has been taken out of production. Farm businesses are also now buying water to simply ‘give back’ later so that they can assure their future existence. These perverse outcomes are not sustainable.

The MDBA is also yet to address how it will make the water recovery target should there be no more willing sellers. The sector must have certainty that there will be no mandatory buybacks or mandatory recovery into the future – otherwise there will be no investment confidence or productivity improvements. Concerns have been raised at both the state and federal levels of government about any form of anti-competitive buyback or coercion which does not align with the objectives of the *Water Act 2007 (Cth)*.

### ***Adoption and Quantification of Complementary Measures***

The adoption of non-flow measures into the assessment approach for SDL adjustment is an imperative. QFF strongly supports the adoption of complementary measures to assure quality and sustainable environmental outcomes for the Basin and improve overall catchment health. These measures could include but not be limited to:

- carp control through the release of the Carp Herpes Virus
- cold water pollution mitigation through the installation of thermal curtains on major headwater storages
- feral animal control in wetlands such as the Narran Lakes, Gwydir Wetlands and the Macquarie Marshes
- fish habitat improvement through re-snagging
- acquisition and management of important wetland sites.

More work must be done to understand the environmental improvements and water equivalence of these measures. QFF supports a moratorium on any water buybacks while this work is undertaken.

QFF also supports further water recovery based on irrigation infrastructure improvements rather than through the purchase of water entitlements which, once sold, provide no future agricultural or community benefit.

### ***Recognition and Use of Existing Initiatives***

Queensland irrigators, led by QFF member Cotton Australia, have already implemented a framework (through a Code of Practice) to facilitate the release of waters from on-farm storages to supplement environmental flows. The initial incentive for the development of the Code was based on consideration by the Commonwealth Environmental Water Holder (CEWH) of the use of private irrigation infrastructure to divert, store, supply and/or re-direct environmental water as part of active water management in the northern unregulated rivers of the Murray-Darling Basin.

Since the concept was originally raised, release of stored water for purposes other than those of the CEWH have been identified, including:

- request by a state agency to satisfy a state purpose
- to allow a landholder to move water from one property to a downstream property

- to lower the water level in a storage which was in urgent need of repair.

To facilitate this, a Code of Practice [under section 318E(1) of the *Environmental Protection Act 1994 (Qld)*] has been developed with support from the Queensland Department of Environment and Heritage Protection. The Code is concerned with the potential impacts of releasing water on the values of the receiving environment, and those impacts and values are essentially the same irrespective of the purpose of release.

Any release requested by the CEWH would be for the purpose of achieving a targeted beneficial environmental outcome related to the environmental watering requirements specified for the region.

The use of private infrastructure for active management is necessary because the availability of suitable public infrastructure (in-river dams or weirs) is limited. The infrastructure originally constructed by landholders (e.g. channels, storages, pumps and pipes) to access water entitlements, which are now owned by the Commonwealth, is often still in place and potentially operational but otherwise essentially redundant. Under the activity, contractual arrangements for use of the infrastructure would be agreed between landholders (who still own the storages and related infrastructure) and the CEWH. Similar arrangements would be required between landholders and any other party wishing to release water.

QFF also notes that the environmental value (as bird and fish refuges etc.) of these off-stream water storages was not considered in the broader MDBA review.

#### ***A Plan for Ensuring the Sustainability of Impacted Communities and Individuals***

The MDBA has confirmed that the SDLs will influence the overall scale of the socio-economic dis-benefits and costs of implementing the proposed reforms, in particular the proposed removal of more water up to 320 GL.

Agriculture and the communities in the northern Basin have a high dependence on irrigation. These communities rely on the existing water allocations and have been already impacted by operational, technological and market changes which have resulted in demographic and social pressures.

These communities are also experiencing other challenges such as exponential increases in the cost of electricity through to the loss of local essential welfare services. As such, community vulnerability to further water buybacks, either willing or mandatory, is high.

Communities will need to be appropriately informed and equipped with the right tools and assistance to be adaptive and resilient to these changes. To date, there has been no formal program proposed for the impacted communities. This must be addressed.

#### ***Better coordination of MDBA planning and Queensland Government's Water Resource Planning***

DNRM is currently reviewing the water resource plans for the Murray-Darling Basin catchments. These plans require review and replacement under the *Water Act 2000 (Qld)* and will expand on the management of groundwater. The plans must also be consistent with the Basin Plan and with the requirements of the *Water Act 2007 (Cth)*.

QFF recognises that there is considerable overlap between the state and Commonwealth water plans and processes, with considerable stakeholder consultation opportunities offered by both levels of governments. To date, these processes have resulted in confusion and consultation fatigue amongst the impacted stakeholders.



The Queensland Government is seeking to finalise policy development frameworks by August 2017, with the release of the draft water plans for the catchments in January 2018. Plans are to be finalised for June 2019. As such, the ongoing state and Commonwealth consultation and submission processes for these catchments will continue to overlap.

The process to improve current state water plans requires consistency with MDBA decisions, not least in the risk assessment chapter, but also regarding water for the environment of appropriate quality. Given the required synergy between the water planning processes and overlapping timescales, QFF strongly suggests a coherent and inclusive dialogue amongst all government departments to achieve a holistic and beneficial outcome for impacted communities.

If you require further clarification or have questions about this submission, please contact Dr Georgina Davis on (07) 3837 4720 or email [georgina@qff.org.au](mailto:georgina@qff.org.au).

Yours sincerely

Travis Tobin  
Chief Executive Officer