



QUEENSLAND FARMERS' FEDERATION

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Submission

2 May 2018

Lake Eyre Basin Secretariat
Water Division
Department of Agriculture and Water Resources
18 Marcus Clarke Street
CANBERRA ACT 2601

Email: lebsecretariat@agriculture.gov.au

Dear Mr Biesaga

Re: Submission on the second review of the Lake Eyre Basin Intergovernmental Agreement

The Queensland Farmers' Federation (QFF) is the united voice of intensive agriculture in Queensland. It is a federation that represents the interests of peak state and national agriculture 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 farmers by representing the common interests of our member organisations:

- CANEGROWERS
- Cotton Australia
- Growcom
- Nursery & Garden Industry Queensland (NGIQ)
- Queensland Chicken Growers Association (QCGA)
- Queensland Dairyfarmers' Organisation (QDO)
- Australian Cane Farmers Association (ACFA)
- Flower Association
- Pork Queensland Inc.
- Queensland United Egg Producers (QUEP)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Queensland Chicken Meat Council (QCMC)

QFF welcomes the opportunity to provide comment on the second review of the Lake Eyre Basin Intergovernmental Agreement. QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

The united voice of intensive agriculture



QFF notes that geographically, land use in the Basin is dominated by grazing (82%). QFF does not represent graziers in Queensland. However, QFF provides comment on this review as future land use in the Lake Eyre Basin area may alter due to climatic changes and other developmental opportunities for QFF members.

It is also noted that the most economically significant industry within the Basin is the resources industry, and that actions from this industry within the Lake Eyre Basin area may also critically impact water quality and availability in the Great Artesian Basin, ultimately impacting QFF's member industries, which rely heavily on groundwater through their allocations and licence entitlements.

Background

The Australian Government is working with the Queensland, South Australian and Northern Territory governments and the Lake Eyre Basin community to implement the Lake Eyre Basin Intergovernmental Agreement.

The *Lake Eyre Basin Intergovernmental Agreement Act (2001)* was signed by Ministers of the Australian, Queensland, South Australian and Northern Territory governments. The purpose of this Agreement is to provide for the development or adoption, and implementation of policies and strategies concerning water and related natural resources in the Lake Eyre Basin Agreement Area to avoid or eliminate so far as reasonably practicable adverse cross-border impacts.

QFF understands that the Department of Agriculture and Water Resources is conducting a public consultation process within and outside the Lake Eyre Basin Area on behalf of the Lake Eyre Basin jurisdictions, on the second review of the Lake Eyre Basin Intergovernmental Agreement.

The review has considered the operation of the Agreement and the extent to which the objectives identified in the Agreement have been achieved, potential amendments to the Agreement to improve its effectiveness and to reflect new knowledge, emerging issues and institutional frameworks.

Response to Section C Questions

Question 5.

The Review found that the Agreement is broadly achieving its purpose, which is to provide for the development and implementation of policies and strategies concerning water resources in the Lake Eyre Basin to avoid cross-border impacts. In what ways do you think that the Australian, state and territory governments can work together to continue to achieve this purpose.

The limited focus on 'cross-border impacts' appears to have restricted the geographical scope and therefore the area included in the Lake Eyre Basin Intergovernmental Agreement Area (as per Appendix A). The area of the Lake Eyre Basin Intergovernmental Agreement should include the geographical and hydrological area of the Lake Eyre Basin. This amendment would include New South Wales.

QFF also suggests revision or clarification on the focus of 'cross-border impacts' to ensure that it explicitly includes factors which impact the Lake Eyre Basin.

Question 6.

The Review mentions that the assessment of the condition of the Basin's water resources occurs every ten years. The Review also suggests that there is value of having a monitoring framework that is more closely linked to resource assessment, research and policy outcomes. What are your thoughts on a monitoring strategy being developed to target priority areas? What improvements would you make to

the Agreement in relation to the monitoring activities performed? What are your thoughts on maintaining the current 10-year cycle of the reporting on the condition of the Basin and undertaking the review of the Agreement? (Refer to recommendations i, xvi, xvii and Section 2.1, pg 16, Section 2.7, pg 33 and section 2.8, pg 34.)

While the focus on water in the scope, the data appears to be insufficient to make a judgement on the state of the Basin with regards to the biophysical assets/condition and therefore the social and economic condition of the basin. QFF recommends that social-economic data should also be collected.

A ten-year reporting cycle is extensive, particularly as bureaucracy across the participating governments has, to date, increased the actual release date for relevant publications. QFF assumes that data is continuously collected between the scheduled reporting cycles. As such, data should be made accessible to all Lake Eyre Basin stakeholders as it becomes available using a range of other media channels such as a web page. This would facilitate stakeholder participation and continuous review of the data being collected and provide opportunity to share methodological approaches and critical base line data sets.

QFF would support the development of a monitoring strategy to target priority areas which must ensure the reliability and validity of the data collected and, most importantly, clarify the aim/rationale for the data being collected.

Question 7.

The Review found that the Agreement does not include the triggers needed to raise management responses to emerging issues and recommends developing and using Key Performance Indicators to act as triggers. What changes do you think need to be made to the Agreement to effectively respond to the current and future threats and pressures? What future scenarios should be explored to assess potential threats, pressures and opportunities in the Agreement? How should water demand across the Basin from development, agriculture and other industry be considered? (Refer to recommendations ii, vi, vii, xi and xiv, section 2.4, pg 22 and section 2.5, pg 25-26.)

QFF notes the Review's comments that whilst there is a framework in place to deal with threats and pressures once they arise, "the development of proactive measures, supported by Key Performance Indicators as measurement criteria, would allow the Senior Officers Group and Ministerial Forum to prevent issues arising in the first place. A risk-based precautionary approach to managing threats and pressures is the most efficient and effective way to maintain the Basin's current good health" (page 5).

QFF supports the use of Key Performance Indicators developed as per Recommendation iii to act as triggers for management actions as part of a risk based precautionary approach.

There are several guiding principles of environmental policy set out in the Intergovernmental Agreement on the Environment, including the 'Precautionary Principle', 'Intergenerational Equity' and the 'Conservation of Biological Diversity and Ecological Integrity'. This Agreement was designed to provide a mechanism to align the decision making between States and the Federal Government, and to facilitate better environmental protection.

Within this agreement, Section 3.5.1 states the precautionary principle as -

"Where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. In the application of the precautionary principle, public and private decisions should be guided by:

1. careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment; and
2. an assessment of the risk-weighted consequences of various options."

QFF recommends this principle be given due regard with any future expansion of shale and tight gas within the Lake Eyre Basin (and including the Great Artesian Basin).

Question 8.

The Review found the Agreement was lacking a specific outline of funding and reporting arrangements. As a stakeholder, what other matters relating to governance/management would you like to see included in the Agreement? (Refer to recommendations iii and xv, section 2.2, pg 16 and section 2.6, pg 32.) For example, financial arrangements, decision making processes, clear budgets and best practice operations.

QFF supports the Review's recommendation to amend the Agreement or a specific Regulation outlining more detailed financial arrangements, including budgets and reporting required to operate the governance structures identified within the Agreement.

Funding arrangements must be transparent to all stakeholders particularly where there is direct public funding and non-cash contributions to account for. The public must have confidence that the expenditure is fully accountable.

Question 9.

The Review found the Agreement does not currently include a long-term action plan or strategic planning framework. What changes would you incorporate into the Agreement to encompass a coordinated basin-wide approach for management of the Basin that addresses cross-border impacts? (Refer to recommendations section 2.3, pg 19 and section 2.5, pg 26.)

While QFF supports in principle, the Review's recommendations to develop a new long-term action plan for the Lake Eyre Basin to address cross-border impacts; and develop review and reporting process for the efficacy of policies and strategies adopted by the Ministerial Forum, QFF does not want to see duplicate or conflicting plans.

QFF notes that Queensland already has water plans which cover the Lake Eyre Basin area, and which already outline strategy and include well-developed science and data reporting frameworks. Water plans are developed under the *Water Act 2000 (Qld)* to sustainably manage and allocate water resources in Queensland.

QFF would however welcome clarity on a future strategy to manage expansion of the resource industry within the Basin area.

Question 10.

The Review shows a commonality in approach between the Lake Eyre Basin and Great Artesian Basin governance and management. In your opinion, what benefits do you consider there are in integrating surface and groundwater management, and bringing the Lake Eyre Basin and Great Artesian Basin governance, stakeholder engagement and monitoring activities together? (Refer to recommendation viii, section 2.5, pg 27.) This includes the part of the Basin between the current boundary of the Lake Eyre Basin and Murray-Darling Basin.

QFF agrees with the Review's statement that "good integrated water management practice brings together the management of ground and surface water resources, as well as related natural resources, to maximise environmental, social and economic outcomes" (page 28), and acknowledges the existing commonality between the institutional instruments of the Lake Eyre Basin Intergovernmental Agreement and the Great Artesian Basin Strategic Management Plan (as seen in Table 1).

QFF welcomes the acknowledgement of the potential connectivity between the Lake Eyre Basin and the Great Artesian Basin. The investigative studies of the interconnectivity between these Basins is continuing to improve as is the body of knowledge about the ecosystems dependent on shallow groundwater through conceptual models and mapping. QFF notes that there needs to be improvement in the spatial data sets required to map ground water dependent ecosystems, and on-ground investigations to determine different groundwater dependent ecosystems and their degree of reliance on groundwater.

Question 11.

The Review suggests there is a need to strengthen the structures of the Agreement to allow it to operate effectively and improvements could be made to strengthen the collaboration between decision makers, community, industry and scientists. As a stakeholder, what details of how the Community Advisory Committee and Scientific Advisory Panel operate should be in the Agreement i.e. roles and responsibilities? Including the Community Advisory Committee and Scientific Advisory Panel in the Agreement, what are your thoughts on providing them with the authority to create a sub-committee to advise on key issues? (Refer to recommendations ix and x, section 2.5, pg 26.)

QFF supports the recommendation to investigate the options of amending the Agreement to include outlining the operation of the Scientific Advisory Panel and the Community Advisory Committee or developing a Regulation to the Agreement to this effect. QFF also supports opportunities to create a sub-committee derived from the Scientific Advisory Panel and Community Advisory Committee to advise on any climate change impacts.

If you have any queries relating to this submission, please contact Dr Georgina Davis at georgina@qff.org.au.

Yours sincerely

Travis Tobin
Chief Executive Officer