



QUEENSLAND FARMERS' FEDERATION

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Submission

1 June 2018

Mr James Purtill
Chief Executive, Department of Natural Resources, Mines and Energy
Attn: Border Rivers Moonie Water Plan Coordinator
PO Box 318
TOOWOOMBA QLD 4350

Via email: WPCondamineBalonne@dnrme.qld.gov.au

Dear Mr James

Re: Draft Water Plan (Condamine Balonne) 2019

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 Draft Water Plan (Condamine Balonne) 2019. QFF provides this submission without prejudice to any additional submission provided by our members or individual farmers.

The united voice of intensive agriculture



The Condamine Balonne Water Plan is scheduled to expire in 2019 and needs to be revised to be consistent with the requirements of the Murray-Darling Basin Plan 2012.

QFF acknowledges the considerable work undertaken by the department to revise the Water Plan which is accredited and must comply with the Queensland Murray-Darling Basin Plan.

Plan area and water to which the Plan applies

QFF has interest in understanding fully the implications of implementing the Draft Plan for the following areas:

- a. Underground water sub-areas – for the conversion of licences to water allocations in the Oakey Creek Alluvium, Dalrymple Creek Alluvium and Condamine Alluvium
- b. Underground water sub-areas – licencing in the Nobby Basalts (shallow and deep)
- c. Central Condamine Alluvium sub-areas – amendment of licences to implement SDLs
- d. Water Management Areas (across the plan area) – licencing
- e. Water Management Zone (surface) – improved flow management in the Narran area
- f. Underground water – unallocated water in the sediments above the Great Artesian Basin, Condamine Fractured Rock and Queensland Murray-Darling deep
- g. Underground water – implementation of multiyear accounting

Our submission may not fully address issues involved in implementing planning in these areas. We would like the opportunity to further consult with the department to clarify any issues and questions we might have after this submission is made.

Plan Outcomes

QFF supports the balanced approach that is taken in the Draft Plan to define economic, social, cultural and environmental outcomes and the measures for achieving the outcomes. Specification of the measures in particular improves considerably the transparency around implementation of the plan. Measures that warrant mention include:

- a. defined time of 31 December 2022 for completion of the measurement of new water allocations and water licences with a nominal entitlement of more than 10ML in defined groundwater areas
- b. annual water use reports about compliance and SDLs
- c. decisions to implement flow management in the Lower Balonne to be published at least annually
- d. monitoring, evaluation and reporting strategy is to be developed by 1 July 2020
- e. information about the number, value and volume of water entitlements but there is no timing specified
- f. report on flow requirements to support cultural values and uses within 5 years informed by engagement of Aboriginal people
- g. process for the granting water entitlements for use by aboriginal people from specific reserves of unallocated water.

Objectives and performance indicators

The Environmental Flow Objectives and performance indicators outlined in Schedule 7 have been developed from environmental assessments undertaken for the Plan review. The Environmental Assessment Report for the review of Water Plan (Condamine Balonne) 2004 and the Resource Operations Plan (ROP) recommends potential mitigation strategies, monitoring requirements and improved specification of outcomes to address the environmental risks for both surface and groundwater assets in the plan area.

There is also a Long Term Water Plan in accordance with the Basin Plan which sets objectives targets and watering requirements for key assets. Annual environmental watering priorities are also set. This work draws upon the extensive and detailed investigations undertaken in the Northern Basin Science Review that focused mainly on the Lower Balonne.

It is noted that the EFOs in Schedule 7 now provide for fish migration flow events, flood plain inundation and river form flows (i.e. daily events which are in excess of flow thresholds). These objectives are more targeted than the EFOs in the current plan which refer to low and summer flows, flood conditions (1-2 year and 1-10 year and beneficial flooding). They address recommendations in the Environmental Assessment Report for the review of Water Plan regarding flow management following no flow periods, preserving flows to move sediment and promote floodplain inundation, minimising the impact of storage operations on natural flow events and redefining flows to support bird breeding and wetlands vegetation in the Narran Lakes area.

The EFOs also cover groundwater for productive base and base flow.

There has been substantial time and investment made to improve the science and implementation of environmental flow management in this plan area which should ensure that the draft plan meets one of the five accreditation tests – ‘No less protection of environmental water’. However, this will not be sufficient to gain full accreditation if SDLs are not met.

Strategies for achieving water plan outcomes

QFF welcomes the addition of Section 32 ‘Garden size and volume of water for watering’ which reduced ‘garden size’ to 0.25ha in this Water Plan from the 0.5ha defined in Section 6 of the *Water Act 2000*. Increasing sub-divisions in some of the Water Plan zone, particularly in the management areas, is a concern.

QFF understands that the department has undertaken a risk assessment in the reticulated areas and, has also restricted stock and domestic takes which QFF supports.

QFF requests that a note be added to Section 39 ‘Limitations on taking overland flow water’ to acknowledge the legal requirements under the *Environmental Protection Act 1994* (see Section 440ZG ‘Depositing prescribed water contaminants in waters and related matters’). While QFF is supportive of the intent of Section 39, it must also be made clear that the implementation of this provision would not prevent a person from complying with their obligations under the *Environmental Protection Act 1994*.

Unallocated water

It is noted that the plan provides for unallocated water in groundwater located in Sediments above Great Artesian Basin (4,500ML), Condamine Fractured Rock (660ML) and Queensland Murray-Darling Basin deep (15,000ML). QFF will require further briefing on likely availability of these resources into the future.

Amending or granting water licences to meet SDLs in the Upper Condamine Alluvium

QFF supports these provisions to facilitate the Commonwealth Government recovering groundwater in the Upper Condamine Alluvium to meet a reduction of licenced entitlement for consumptive use of 46,221ML. This section of the Draft Plan will allow those licence holders that have participated in the Commonwealth Government’s water recovery programs to be granted a nominal entitlement for their licence. QFF will continue to monitor progress with the implementation of water recovery and the implementation of these plan measures.

Water allocations

Provisions to convert groundwater licences in Oakey Creek and Dalrymple Creek alluviums and Cunningham alluvium are noted. QFF may require further advice on the implementation of the WMP in these groundwater areas.

Water Management Protocol

QFF does not have detailed comments on the draft WMP at this stage. We would need feedback from local entitlement holders and our industry members to identify localised issues that may need attention.

While it is expected that many parts of the WMP may reflect arrangements put in place by previous ROPs, there are a few issues listed below that QFF would like the opportunity to consult further with the department. QFF may also seek to make a follow-up submission on any issues coming out of consultations and others that may be raised with us by our members including local irrigation groups.

- a. *Seasonal water sharing and critical water supply arrangements in the Upper Condamine Scheme* – While it is understood that this is not an issue being dealt with directly in this WMP, irrigation customers of the scheme are very concerned about time it has taken to clearly separate the application of these rules to avoid confusion that has occurred over seasonal medium priority allocations. Part of their concern reflects the added high priority entitlement for Warwick City and the impact that this likely to have on the availability of irrigation water in low water years. They are also aware that the issue is subject to detailed modelling which is expected to be subject to full scrutiny in this plan review. This is an important matter that needs to be resolved in consultation with the irrigators during consultation on the plan review.
- b. *Nobby area groundwater* – QFF is aware that the department has been conducting consultations in this area about concerns from some irrigators about access to groundwater for additional irrigation development. This area is nominated as a groundwater sub area of the Upper Condamine Basalts and is defined as two sub units Nobby Basalts shallow and Nobby Basalts deep. QFF seeks further consultation of the implications of this nomination under the Draft Plan and the WMP.
- c. *Implications for the implementation of revised flow management arrangements and the WMP for supplemented and unsupplemented water in the Lower Balonne* – Management of environmental flows in the Lower Balonne will continue to be a sensitive and important issue. QFF and members, particularly Cotton Australia, want to be fully briefed on proposed management arrangements that are likely to vary with the implementation of the Plan and the WMP. This would include the revised Narran Lakes flow management arrangements.
- d. *Implications of the WMP for other water management areas* – As noted above, QFF has an interest in the implementation of the WMP in other surface and groundwater management areas.

Overall with the WMP, we want to ensure that local irrigator groups understand all aspects of the implementation of the WMP across the plan area where it is likely that there will be changes to management arrangements.

If you have any queries about this submission, please contact Ian Johnson ian@qff.org.au.

Yours sincerely

Travis Tobin
Chief Executive Officer