



QUEENSLAND FARMERS' FEDERATION

Primary Producers House, Level 3, 183 North Quay, Brisbane QLD 4000
PO Box 12009 George Street, Brisbane QLD 4003
qfarmers@aff.org.au | 07 3837 4720
ABN 44 055 764 488

Submission

15 June 2018

Mr James Purtill
Chief Executive, Department of Natural Resources, Mines and Energy
Attention: Water Planning Coordinator
PO Box 5318
TOWNSVILLE QLD 4810

Email: WPBurdekin@dnrme.qld.gov.au

Dear James

Re: Draft Amendment of the Burdekin Basin Water Plan and Draft Water Management Protocol

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 Amendment of the Burdekin Basin Water Plan and Draft Water Management Protocol'. We provide this submission without prejudice to any additional submission provided by our members or individual farmers.

The united voice of intensive agriculture



The 'Statement of Intent' outlines that the draft amendment plan has been prepared to improve the framework for the allocation and management of surface water resources in the sub-catchment areas of the Burdekin Basin that flow into Burdekin Falls Dam, in response to emerging agriculture and mining water demands.

QFF strongly supports the ability of farmers to trade water and understands from the department that the amendments to the Water Plan have been instigated by the agricultural community.

QFF notes that the proposed amendments will convert existing water licences to tradeable water allocations. QFF notes two matters which require careful explanation and understanding by the department and explanation to the agricultural community:

1. Implications from the Land Valuation Act 2010

For rural lands, the Act requires the Valuer-General to determine the market value of the unimproved land. Generally, a water licence forms part of the unimproved value, whereas a water allocation does not. As such, land owners will see the future valuation of irrigable properties in the Burdekin Basin Water Plan area that have a water licence reflect the prices paid for the irrigable sale properties. This is likely to increase the rateable value of the land and will influence future fees for rates, land tax and state land rental (for leasehold land) purposes.

The matter of whether a water licence forms part of the unimproved land has been contested in the Courts. The Court of Appeal has held that the benefit of water licences was not to be disregarded in assessing the unimproved value of the land.

2. Infrastructure and Safeguards

In order to facilitate trading, water meters will be required. This is critical, particularly for those landowners who only trade a proportion of their allocation. It is noted that this area has significant 'Blackspots' and while some will be addressed in the Mobile Black Spot Program Round 2, it is unlikely that other areas will be addressed in the near future, particularly where blackspots are due to topographical factors.

QFF also has serious concerns that the department lacks the monitoring and reporting software to track these trades, particularly part-trades, in a timely manner.

Finally, QFF notes that in the 'Statement of Intent' it is proposed to 'allow more time for landholders to notify the department of existing overland flow storages so that they continue to be authorised to take water from those storages'. QFF understands that this provision has been in the Plan since 2007. To facilitate a trading environment, it is necessary to quantify and licence these storages.

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

Yours sincerely



Travis Tobin
Chief Executive Officer