



QUEENSLAND FARMERS' FEDERATION

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Submission

4 February 2019

Chief Executive Attn: Moreton Water Plan Coordinator
Department of Natural Resources, Mines and Energy
Gatton Research Station
Locked Mail Bag 1009, MS 437
GATTON Q 4343

Via email: WRPMoreton@DNRME.qld.gov.au

To Whom It May Concern

Re: 10-point response to the Draft Plan amendment submitted by the Lockyer Water Users Forum

The Queensland Farmers' Federation (QFF) is the united voice of intensive, semi-intensive and irrigated 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 farmers 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)
- Flowers Australia
- Pork Queensland Inc.
- Queensland United Egg Producers (QUEP)
- Queensland Chicken Meat Council (QCMC)
- Bundaberg Regional Irrigators Group (BRIG)
- Burdekin River Irrigation Area Irrigators Ltd (BRIA)
- Central Downs Irrigators Ltd (CDIL)
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd.

QFF welcomes the opportunity to provide comment on the 10-point response to the Draft Plan amendment submitted by the Lockyer Water Users Forum (LWUF). We provide this submission without prejudice to any additional submission from our members or individual farmers.

The united voice of intensive agriculture





QFF, Growcom and other members support the amendment in full. Specifically, our organisations agree with the following points in the LWUF submission:

1. Implementation of differential groundwater water allocations will unfairly discriminate 'against property owners in transferring capital value from one landholder to another'.
2. The hydrologic data and model upon which the draft amendments have been based cannot be accepted given the fundamental and systemic flaws as detailed in the "Report on High-level Review of the Central Lockyer Groundwater Model" prepared by consultants hydrogeologist.com.au.
3. The estimated quantities and extent of supplemented benefit that the schemes actually deliver in providing recharge to the groundwater aquifer of the Central Lockyer need to be revised taking into account the poor performance of the supply scheme infrastructure.
4. Water quality must be taken into account as to 'whether groundwater is fit for purpose for irrigation and whether a bore should be categorised as being connected to benefitted groundwater or not'.
5. A sensible and locally formulated water plan could bring value to the Central Lockyer provided the plan is 'developed and implemented in close liaison with irrigators and based on sound science that is underpinned with valid data and a well-considered, contemporary conceptual groundwater modelling framework'.
6. Introduction of part A fixed cost recovery for groundwater in the Central Lockyer schemes is not justified or appropriate and the current volumetric pricing arrangements should continue.
7. 'Robust water metering and groundwater level monitoring' is required in the Central Lockyer.
8. Need for adoption of all key principles outlined in Item 8 of the LWUF submission to protect property values from being undermined, support businesses within the region and contribute to a water plan that is appropriate for the Central Lockyer.
9. Need for the State Government to set aside the current water plan amendment and put in place a transparent process to enable irrigators and government to collaboratively formulate a new plan based upon six elements defined in Item 9 of the LWUF submission.
10. Need for the of local, state and federal governments support for the implementation of the proposals in the LWUF submission.

It is essential that the next phase of the planning process consider in detail the above issues in close consultation with entitlement holders and other stakeholders.

QFF, Growcom and other members will continue to support all efforts to put in place a water plan amendment that will implement fair water entitlements and avoid any significant impacts on the viability of irrigation enterprises in the Central Lockyer Water Supply scheme.

Yours sincerely

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Chief Executive Officer
Queensland Farmers' Federation

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Growcom