



# QUEENSLAND FARMERS' FEDERATION

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## Submission

29 May 2020

Mr Brian Latcham  
Water Planning South Region  
Department of Natural Resources, Mines and Energy  
BUNDABERG QLD 4670

Via email: [WaterPlanning.Burnett@dnrme.qld.gov.au](mailto:WaterPlanning.Burnett@dnrme.qld.gov.au)

Dear Mr Latcham

**Re: Draft amendment to the water management protocol for the Burnett Basin Water Plan, on the Barambah Creek groundwater management area (April 2020).**

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)
- 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)
- Fairbairn Irrigation Network Ltd
- Mallowa Irrigation Ltd
- Pioneer Valley Water Cooperative Ltd (PV Water)
- Theodore Water Pty Ltd.

*The united voice of intensive, semi-intensive and irrigated agriculture*



QFF welcomes the opportunity to provide comment on the draft amendment to the water management protocol for the Burnett Basin Water Plan, on the Barambah Creek groundwater management area. We provide this submission without prejudice to any additional submission from our members or individual farmers, noting that QFF has not received detailed feedback from all sectors due to the current operating constraints.

### **Draft Burnett Basin Water Management Protocol**

QFF notes that the use of groundwater provides an important supply of water for irrigation and other farming practices. We are also aware of the stress that many of the groundwater aquifers across the state are experiencing due to the ongoing drought conditions, with little recharge from rainfall.

QFF understands that the draft Burnett Basin Water Management Protocol has been amended to include the Barambah Creek groundwater management area to ensure reliability and availability of the groundwater resource for existing users. The changes are:

- Chapter 1 section 6 has been expanded to include Barambah Creek groundwater management area as water to which this plan applies. Reference in section 6(1) to surface water as the only water to which this plan applies has been removed.
- A new Chapter 9 has been added to specify water sharing rules for unsupplemented water licences in the Barambah Creek groundwater management area.
- Monitoring responsibilities for the chief executive are now specified in Chapter 10.
- Attachment 4 has been added which includes sub-areas of the Barambah Creek groundwater management area.

QFF supports the allocations proposed in the draft amendment to the water management protocol of the Burnett Basin Water Plan in the Barambah Creek groundwater management area. However, the longevity of utilising groundwater as a predominant supply may continue to decline as climatic variables change over time, thus potentially reducing the recharge to aquifers. It is acknowledged that the Barambah Creek area, throughout the year does get varying levels of irrigated water and rainfall seepage through the soil profile to recharge. However, due to the varying stratigraphic layers that feature in this landscape, the storage of groundwater in this area is limited. As a result, it is highly recommended that long-term seasonal variations are considered in consultation with stakeholders, to ensure continued reliability and availability of water for all users.

As a result, alternative water supplies and allowances for agricultural needs must be considered, for farming in this area to remain sustainable into the future and to provide flexible agricultural practices to alter crops dependent on climate and water allocations. QFF supports the regulation of groundwater where it is necessary, subject to scientific evidence and meaningful consultation with all stakeholders. This helps ensure the longevity of water as a vital resource for farming, along with securing existing groundwater entitlements into the future.

### **Water Sharing Rules**

As noted by the Department of Natural Resources, Mines and Energy (DNRME), *'Barambah Creek groundwater supports a diverse mix of irrigated crops, intensive agriculture and stock, from cotton and hay to dairy farms and piggeries, as well as stock and drinking water for domestic supplies.'* Water sharing amongst all stakeholders and allowing transfer of licences either on a permanent or temporary basis to allow for seasonal requirements needs to be included, to allow for when insufficient groundwater is available. As also noted by DNRME, various farming is involved in this region and as noted the hydrogeology of the landscape is complex, and at times there are insufficient levels of groundwater for consumptive use.

There are stakeholder concerns about the proposed volumes of water availability and how the division of groundwater allocations will be divided up in a fair and equitable manner. As noted in the Draft

Burnett Basin Water Management Protocol, the addition of water sharing rules for unsupplemented water licences in groundwater sub-areas, is supported, though it is noted from the primary assessment report that various assumptions were made in the modelling scenarios to validate the proposed amendments to water licences in sub-areas. **As such, QFF strongly recommends that these proposals be trialled to factor in seasonality of usage, in consultation with water entitlement holders.**

The Draft Burnett Basin Water Management Protocol has not made any recommendations for the permanent or temporary transfer of water licences. Licence holders under this protocol will not have an opportunity to be granted additional groundwater requirements, regardless if their entitlements are insufficient. This risks some farming become uneconomical, with the sustainability of their farms in questions when there are significant reductions in available groundwater.

**Introducing temporary seasonal/permanent trading licences would alleviate pressure and allow intensive irrigated farms to contribute to the sustainable management of groundwater use.** Without the facility of adequate water trading in this proposal, the long-term reliability and availability of water remains in question. In longer drier seasons, when dam supply is insufficient, not having regulated water trading in place could see an increased decline in the aquifer with 'sleeper licences' activated. Farms that are dependent on groundwater will see a vast decline in the reliability of groundwater if this issue is not addressed.

QFF supports the proposal of water sharing, however, a seasonal sharing approach needs to be integrated into the proposal to allow for all farming practices to have the ability to trade water when required, and will help reduce the impact of stress on aquifers, especially in times of drought and allow water to remain equitable. The ability to have a fair and equitable supply of water is paramount for the long-term viability and sustainability of Queensland's farming sector.

If you have any queries about this submission, please do not hesitate to contact Ms Sharon McIntosh at [sharon@qff.org.au](mailto:sharon@qff.org.au).

Yours sincerely

Dr Georgina Davis  
Chief Executive Officer