



# QUEENSLAND FARMERS' FEDERATION

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## Submission

15 December 2021

Ms Toni Stiles  
Director, Measurement and Assurance  
Department of Regional Development, Manufacturing and Water  
1 William Street  
BRISBANE QLD 4002

Via email: [RWFP@rdmw.qld.gov.au](mailto:RWFP@rdmw.qld.gov.au)

Dear Ms Stiles

### Re: Queensland's non-urban policy positions (September 2021)

The Queensland Farmers' Federation (QFF) is the united voice of intensive and irrigated agriculture in Queensland. It is a federation that represents the interests of 21 peak state and national agriculture industry organisations and 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)
- EastAUSmilk (formerly QDO)
- Australian Cane Farmers Association (ACFA)
- Turf Queensland
- 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
- Eton Irrigation Scheme Ltd
- Pork Queensland Inc
- Tropical Carbon Farming Innovation Hub
- Queensland Oyster Growers Association (QOGA)
- Lockyer Water Users Forum (LWUF).

*The united voice of intensive and irrigated agriculture*



QFF welcomes the opportunity to provide comment on Queensland's non-urban policy positions (September 2021). We provide this submission without prejudice to any additional submission from our members or individual farmers.

This submission builds on our previous submission, as well as direct consultation with the Department at several events either attended directly by QFF and/or our members, and therefore it is limited to the following points.

**In summary QFF:**

- Supports an affordable, efficient, and cost-effective water metering, management and compliance framework. If irrigators are to invest in new infrastructure for metering, the Government needs to invest in the compliance and management with no future costs to be borne by irrigators.
- Metering policy should be restricted to the take of water from bores, and un-supplemented supplies, and supplemented water sources (with the proviso that the metering policy of Sunwater and SEQWater align with the Departmental policy, and the metering requirement do not apply within a channel distribution scheme). Offtakes from the river would have to meet the requirement.
- Supports that the enhanced measurement of overland flow should only apply to the Queensland Government's currently identified priority water sources.
- Believes that good metering and measurement is essential to ensure equity and compliance; and to foster an effective water market
- Supports the appropriate use of telemetry but recognises that in many situations its application may not be technically feasible and/or economically warranted.
- Support for telemetry is conditional on the irrigation entitlement holder having the same real-time access to the metering data as the Department.
- Supports the option to use a broad range of telemetry technology and communication channels to transmit the data, so entitlement holders have the widest possible choice for effective and cost-effective telemetry.
- Supports the policy that only the Murray-Darling Basin will require telemetry at this stage and that any expansion of the telemetry requirement would be subject to further consultation with water users.
- Where telemetry is not required, support the roll-out of easy-to-use tools that allow the effective and cost-effective reporting of metering readings.
- Continues to have grave concerns whether AS4747 meters meet the requirements for both effective and cost-effective metering, and calls on the Queensland Government to develop its own assessment process to determine if meters meet a required standard of:
  - + or – 2.5% accuracy on the test bench
  - + or – 5% accuracy when installed
  - Tamper proof
  - Data logger
  - Telemetry capability (if required)Meters that meet the above requirement should be allowed.
- Believes, over and above the previous dot point, AS4747 metering compliance outside the Murray-Darling Basin is extremely hard to justify and will cause significant costs in some schemes which could make them financially unsustainable.
- Seeks clear clarification of what is a “modular meter” and how it can be used.
- Seeks clear guidance on acceptable alternative measurement options, and expectations for reporting, in the event of meter failure during a pumping event.

- Recognises installation and on-going costs of meters is a major concern, and this policy should be very mindful of the economic pressures imposed by the drought, as well as the economic value of telemetry in most circumstances.
- Water meters, used for measuring the take covered by this policy, should be owned and maintained by the water entitlement holder.
- Believes that both the Federal and State Government should be obliged to provide significant financial assistance to water entitlement holders to meet the metering requirements with no subsequent cost recovery exercise.
- Supports the full subsidisation of the telemetry as it is principally a cost of compliance and therefore public benefit.
- Believes that all data collection by Government should be subject to robust and agreed data protection principles including those of lawfulness, purpose limitation, data minimisation, accuracy, storage limitation and confidentiality.
- Supports the ‘grandfathering’ of existing water meters to ensure that farmers are not disposing of working assets before the end of their useful life and incurring unnecessary costs one day early.
- Supports the phased implementation that accounts for current drought declarations (or other emergency circumstances that may arise).
- Believes that the Government’s own metering of natural water resources must meet the same benchmarks as those imposed onto industry.
- Continues to support the continued need for local Departmental knowledge and local personnel – the basis for telemetry must not be at the cost of removing local compliance and policy officers.
- Has concerns over the inconsistencies in the draft policy in reference to metering policy requirements, timing for implementation, and lack of clarity on associated costs.
- Telemetry is not supported on the take of water from bores.
- Notes that meter implementation schedules will not be published until 2022, and although acknowledges that metering must be completed in the Queensland Murray Darling Basin by June 2025, by not including vital details to this process contradicts one of the key policy positions of minimising cost impacts to water users. The implementation schedule needs to formulate part of this draft policy and not be provided after this policy is formed.
- A minimum timeframe of three to five years is proposed, before consultation is undertaken to assess the implementation of the non-urban water metering standards in schemes outside of the Queensland Murray-Darling Basin region.

QFF requests that the Department formally respond to each of the above dot points to provide clarity for our members.

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