



QUEENSLAND FARMERS' FEDERATION

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

Submission

5 September 2022

Attention: Coordinator, Water Plan Implementation
Chief Executive, Water Services Northern Region
Department of Regional Development, Manufacturing and Water
PO Box 156
MAREEBA QLD 4880

Via email: waterplanning.barron@rdmw.qld.gov.au

To Whom It May Concern

Re: Draft Barron Water Plan and Draft Barron Water Management Protocol (July 2022)

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 Draft Barron Water Plan and Draft Barron Water Management Protocol (July 2022). We provide this submission without prejudice to any additional submission from our members or individual farmers.

Overview

The 'Statement of Intent' for the Draft Water Plan (Barron), 2022, outlines that the draft water plan has been prepared to replace the Water Plan (Barron) 2002. To implement the plan, a draft water management protocol, and draft water entitlement notice has been developed in consultation with stakeholders.

The Barron Water Plan area covers approximately 5200km² which comprises the Barron River Catchment and the upper reaches of the Walsh and Mitchell rivers. The plan area also covers the bulk of the Atherton Tablelands region and includes the Mareeba-Dimbulah Water Supply Scheme (MDWSS). The current plan applies to all surface water, excluding overland flow water and underground water in the Atherton, and Cairns Northern Beaches underground water management areas.

The existing plan has been in place since 2002, and to improve the framework and allocation management of surface water and underground water, as noted under section 43 (1)(a) of the *Water Act 2000* (the Act) within the Barron River catchment and the upper reaches of the Walsh and Mitchell rivers, new and more relevant data is proposed. There have been changes to land use, and more than twenty years of climate data included in the planning process. The draft water plan also proposes new and more relevant environmental, social, cultural and economic outcomes, strategies and performance indicators.

The *Water Act 2000* is the water planning framework's overarching legislation for the sustainable planning, allocation, and management of water resources in Queensland and as such QFF wish to address the following items arising from the Draft Barron Water Plan and Draft Water management protocol.

- Unallocated water
- Unsupplemented surface water
- Underground water

Draft Barron Water Plan and Draft Barron Water Management Protocol

It is understood that the outcomes and strategies in the Water Resource (Barron) Plan 2002 were designed to promote sustainable management and efficient use of water resources. From the assessment outlined in the statement of intent, the Barron Water Resource Plan's strategies have been largely successful. As part of the plan's outcomes, it is vital to continue to provide a sustainable framework for the security of the irrigated agricultural sector, through flexible tradeable water allocations.

QFF understands that the Draft Barron Water Plan and Draft Barron Water Management Protocol has been modified to include:

- A new chapter that outlines the breakdown of unallocated water volumes into strategic, general, and indigenous purposes.
- General requirements for granting unallocated water.
- The process for releasing water from indigenous reserves.

- Changes to water allocation dealing rules to be consistent with section 158 of the *Water Act 2000* and part 5, division 3 of the *Water Regulation 2016*.
- Plus, various other administrative changes consistent with the *Water Act 2000* as noted in the Draft Water Management Protocol¹ which are outlined below.

Unallocated Water

For the Barron Water Resource Plan to continue to provide a sustainable framework for the security of the irrigated agricultural sector, and support economic growth for the region, QFF supports the competitive release of unallocated water release via auction or tender. As noted in Part 3, section 14 of the Draft Water Management Protocol,² the scope also defines the process for granting unallocated water from an Indigenous reserve. Unallocated water held as an indigenous reserve in a specified sub catchment may be granted to an eligible person (a native title holder) in that sub catchment to be released to help an Aboriginal or Torres Strait Islander community in the plan area achieve economic and social aspirations.

As noted in the Unallocated water reserved under this plan - Act, s 43, for section 43(1)(c) of the Act, in the consultation draft Barron Water Plan, the total volume of unallocated water reserved under the plan for general purpose is 1,250ML; for Indigenous purpose (2,600ML); and total volume for water licences to take unallocated water in the plan area for strategic purpose is 4,000ML.

QFF as part of decisions on the management of unallocated water, supports the release of unallocated water by auction or tender, which will alleviate the pressure of underutilised water in the market and create competitive pricing for unallocated water, which will contribute to water allocation security objectives and growth in the agricultural sector as noted in Part 4, s24 of the Draft Barron Water Plan, outlined in section 43(1)(e)(ii) of the Act³.

QFF supports the temporary release of unallocated water for Indigenous purposes, from the indigenous reserve, with any trading to be registered to ensure the economic benefits to an Aboriginal or Torres Strait Islander community in the specified sub catchment are delivered to assist in achieving economic and social aspirations.

Unsupplemented Surface Water

'Changes outlined in the Barron Water Management Protocol, include nominal volume in the consideration of subdivision and amalgamation of unsupplemented surface water licences and additional consideration of daily volumetric limits and conditions for seasonal assignments of unsupplemented surface water allocations.'⁴

As part of the proposed changes for Unsupplemented Surface Water in the Draft Barron Water Plan, QFF is proposing that the Draft Barron Water Plan includes a framework that supports high flow water harvesting for the Walsh River and streams that flow into the Mitchell River.

As part of the changes outlined in the Barron Draft Water Management Protocol, QFF supports the non-regulation of overland water use as specified in the Plan, with no changes to be made to the construction of dams on farm for the collection of surface water.

¹ Department of Regional Development, Manufacturing and Water, Barron, Draft Water Management Protocol, July 2022.

² Department of Regional Development, Manufacturing and Water, Barron, Draft Water Management Protocol, July 2022.

³ Queensland Government, Water Plan (Barron) 2022 (consultation draft – July 2022) [Water Plan \(Barron\) 2022 \(rdmw.qld.gov.au\)](https://rdmw.qld.gov.au)

⁴ Department of Regional Development, Manufacturing and Water, Barron, Draft Water Management Protocol, July 2022.

As such, QFF in support of QFF members in the Barron Water Plan area, request that an evaluation is conducted to assess the availability of water harvesting, to be carried out during periods of high flow events, which may then be captured for storage in off-stream storages. This would allow for existing water allocations to be supplemented to the Mareeba Dimbulah Water Supply Scheme (MDWSS). An evaluation period would allow river systems to be monitored, to determine peak flows and undertake a hydrological assessment of historic and current data, with additional monitoring stations established to ensure no adverse impacts to environmental flows. Allowing additional water to be stored from high flow events, under permit, will provide additional water to irrigators and assist with water security in the region which will contribute to long term economic growth and viability for the agricultural sector.

It is important to note that climate change has been incorporated in the Draft Barron Water Plan (July 2022) and Water Management Protocol (July 2022), which show increases with scenarios diverging around 2030, with some temperature rise being inevitable, with an associated increase in potential water losses through evaporation across the catchment. Seasonal rainfall is projected to lower the annual rainfall total, which has the potential to impact natural streamflow, and as such, is vital that a regulated framework that supports high flow water harvesting for the Walsh River and streams that flow into the Mitchell River is investigated to assist with water security.

Underground Water

The Atherton Underground Water Management Area is divided into underground water management area zones.⁵

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, some with little recharge from rainfall.

QFF also notes that without detailed climate change modelling, allowing groundwater allocations to be granted in the Atherton Groundwater Management Zone, noting that all groundwater extracted from this zone are treated equally.

It should be noted that current groundwater licences in the Atherton Groundwater Management Area be considered to transition to water allocations. It is important to note that a water licence is an entitlement attached to the land and is not regarded as an asset in its own right and transitioning from a relocatable water licence to water allocations would make water a separate asset and that any removal of a water licence could inherently impact the land value. QFF proposes that consultation be undertaken prior to making any changes to ensure any change in location does not adversely impact on water security of existing entitlements.

Summary

QFF strongly supports the ability of farmers to trade water and understands from the department that the amendments to the Water Plan offer greater flexibility for water trading to the agricultural community.

⁵ Queensland Government, Water Plan (Barron) 2022 (consultation draft – July 2022) [Water Plan \(Barron\) 2022 \(rdmw.qld.gov.au\)](https://rdmw.qld.gov.au)



Finally, QFF notes that in the 'Statement of Intent'⁶ climate change data was incorporated in the Draft Barron Water Plan and Water Management Protocol, which as previously noted, show increases with scenarios diverging around the year 2030. In the scenarios noted, some temperature rise is inevitable, with an associated increase in potential water losses through evaporation across the catchment. As seasonal rainfall is projected to lower annual rainfall total it will affect natural streamflow, and as such it vital that the storage of overland flow from high flow events (subject to monitoring) is considered as a priority for the future of water security for the agricultural sector and regional communities in the Barron Water Plan Area.

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

Yours sincerely

Ms Jo Sheppard
Chief Executive Officer

⁶ Department of Regional Development, Manufacturing and Water, Statement of intent, Draft Water Plan (Barron) 2022 (July 2022).