

Proposed replacement of the Logan Water Plan

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The united voice of
Queensland agriculture

Contents page

About the Queensland Farmers' Federation.....	3
Submission	3
Background	3
Overview	4
Summary of identified key issues.....	5
Matters to be considered.....	6
Opportunities.....	7
Solutions.....	8
Co-benefits.....	9
Summary	9

This submission is provided to:

Department of Regional Development, Manufacturing and Water
Chief Executive
Water Planning and Science South Region
Attention: Senior Policy Officer

Submitted via email LoganWP@rdmw.qld.gov.au

Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

We are a member-based organisation representing the interests of peak agriculture industry organisations (both state and national). Through our members, QFF represents more than 13,000 primary producers across the cotton, sugarcane, horticulture, dairy, nursery and garden, poultry, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

Submission

RE: Preliminary public consultation notice - Proposed replacement of the Logan water plan (2006) - s44 of the Water Act 2000 (June 2023).

QFF welcomes the opportunity to provide comment on Preliminary public consultation notice - Proposed replacement of the Logan Water Plan (June 2023).

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Background

Queensland's regulatory framework for the management of water resources is established in the [Water Act 2000](#), which provides the bases for catchment-based water planning.¹

Bounded by the Moreton catchment to the north and west, and the Gold Coast catchment to the south, the [Logan Basin water plan area](#) covers approximately 4,200 square kilometres in South East Queensland. There are various catchments managed under the Logan Basin water plan, including the Logan River, Albert River and Burnett Creek.

Included in the Logan Water Plan area are large water storages such as Wyaralong, Maroon and Leslie Harrison dams which supply water to support urban centres such as Logan, Beenleigh,

¹ [Water | Department of Regional Development, Manufacturing and Water \(rdmw.qld.gov.au\)](http://www.rdmw.qld.gov.au)

Beaudesert and the Redlands. Logan River Water Supply Scheme, which includes Wyaralong and Maroon is owned and operated by Seqwater.

Smaller rural settlements within the water plan area include Boonah, Kooralbyn, Canungra and some parts of Tamborine Mountain. These localities rely on unsupplemented surface water and groundwater, with the hinterland areas of Tamborine Mountain and Canungra having limited access to reticulated water supply.²

The aim of the preliminary public consultation is to advise stakeholders and the community about the replacement of the water plan and proposed planning process.

Key issues to be considered during the review and replacement include:

- effectiveness of outcomes, measures, strategies, and performance indicators set out in the water plan.
- opportunities for new unallocated water reserves
- future urban needs and water security for off-grid communities
- effectiveness of water sharing and water trading rules
- effectiveness of environmental management rules
- incorporating best-available science, including consideration of climate change on water availability and the water needs for the environment.
- underground water management in the moratorium areas of Tamborine Mountain and Springbrook
- overland flow and underground water management
- current and emerging interests of Aboriginal people and Torres Strait Islanders, and Native Title holders in relation to water resources in the plan area
- entitlements without volumetric limits
- requirements under the *Human Rights Act 2019*.

As per the *2020-2030 Water Planning Science Plan*,³ water plans are developed to sustainably manage Queensland's water resources by balancing the needs of water users and the environment. These plans determine the amount of water that is available and regulate the allocation and management of it in a plan area. The Logan Basin Water Plan is coming up to its first renewal in twenty years which is the maximum period in which a water plan can be extended. As a result of this extended period, there has been a series of commodity groups operate under different takes of water, some under an area-based water allocation, with some managing their own take of water from different river systems. Both the Gold Coast Water Plan and the Logan Water Plan areas, (which are expiring at the same time) will see similar issues that are addressed in this submission, outlined below.

Overview

The Logan Water Plan covers a significant portion of the Southeast of Queensland.

In this area, QFF has members including the Nursery and Garden Industry of Queensland, EastAusMilk, Queensland Fruit and Vegetable Growers, and Canegrowers.

² [Logan water plan | Department of Regional Development, Manufacturing and Water \(rdmw.qld.gov.au\)](https://rdmw.qld.gov.au)

³ Queensland. Department of Environment and Science and Queensland. Department of Regional Development, Manufacturing and Water (2020) *Water planning science plan 2020-2030*. Brisbane: Queensland Government.

It is important to note that there are a variety of commodity groups, that currently obtain water through a variety of methods and allocations, and that any changes to the Logan River Water Supply Scheme Operations Manual is integrated into the consultation process. This is to ensure that any water sharing rules are clear and transparent, that allow an adequate supply of water to ensure a business remains viable and to ensure a priority is placed on irrigation water, as competition increases via urban encroachment.

As part of this process, it is vital to understand that there are growers that differ in their take of water and that metering is a new process, which will take intensive consultation and education to ensure water security is assured for the long-term viability of farm businesses.

A detailed investigation into the varied takes of water, also must consider the use of water to ensure a fair and equitable take of water occurs in the system. However, it should be acknowledged that all matters are assessed throughout this process, and that a one size does not fit all, and a case-by-case scenario may be required to ensure implementation of changes are attainable and economically viable.

Summary of identified key issues

- Throughout current discussions with irrigators who obtain water from the Albert River, they have a clear view of the current river flow situation, due to historical management, which has allowed them to make clear and informed decisions rapidly when required and ensured fair water availability for all licence holders. As a result of this historical understanding of the existing river system from landholders, it has enabled the government workload to be reduced for which the department has previously recognised. This volunteer system and restrictions have worked well throughout the years, helping to maintain the health of the river, and giving fair access to water for all licence holders.
- Conversion to volumetric - initial discussions indicate that there are no numbers available yet for the Albert River catchment or for the rest of the Logan Water Plan. If licence holders are dissatisfied with the number that the department determine (volumetric allocation), it is vital that landholders can make an application to the department with historical use records and substantiation of use. It is understood that if the Department disagree on numbers requested, it will be sent to an independent panel who will make the final decision. It is understood that the department recognise that there will be some change if going to volumetric system but equally recognise the opportunities that volumetric can bring to licence holders.
- Water trading is supported if it is to provide more flexibility to licence holders. This has currently been the case in Running Creek, and Christmas Creek. There has been agreement from landowners that the Logan River is different in structure from the Albert catchment and therefore needs to be assimilated when assessing trading and allocations.
- It is imperative that allocations of 5ML or less do not require meters.
- As climate change now forms part of the water planning process it is vital that detailed modelling, utilising the latest groundwater flow models (including groundwater dependent ecosystems - GDE's), is assessed to provide an overview of whether climate change will adversely impact the use of water in this region. Having a forecasted outlook will allow business owners to forward plan for mitigation and adaptation strategies.
- Early indicators that water related effects of climate change on water availability, must be considered. Water availability and the potential impacts to land use and may alter the future commodity type that can be farmed in regions.
- A change in weather and climate will impact water security, which is a primary driver for agricultural production in the Logan Water Plan catchment area.

- As per the *Water planning science plan 2020-2030*,⁴ understanding the economic and social value of groundwater utilised for consumptive use including agriculture needs to be considered as a priority in this water plan, which incorporates not only economic metrics such as water usage, potential for industry growth, price and market functionality but also prioritising the social metrics of reliability of supply and continual access of water for primary production.
- As volumetric meters are rolled out throughout the state, it is important to undertake education and consultation, and provide sufficient time for new meters to be installed, and what the associated costs will be. It is to be noted that:
 1. The current licences are controlled by a local water board that meets to discuss water flows and introduce restrictions to taking water as needed. Licence holders are informed of decisions via telephone.
 2. The voluntary upper Albert Advisory committee was formed before pre-1950, which was formed under the natural resource government department which was put in place to provide fair water availability to all licence holders throughout the system.
 3. Irrigators along the Albert River have a clear view of high and low flows in the river and can make and implement quick and intelligent decisions on the best restrictive measures. Government departments have recognised this, which has reduced the department workload. River irrigation measures have changed over the years but for about the last 20 years have stayed the same.
 4. Landowners are aware of environmental flows and take that into account when implementing restrictions. Voluntary restrictions with minimal involvement from government has worked well throughout the years.
 5. Meters are deemed unnecessary on a non-reticulated system such as the Albert River.
- It is important that department consider the take of water from upstream water users when the river isn't in full flow, which could leave downstream users with an insufficient supply of water, and how this will be accounted for, to stop this occurring. Further investigation is needed to ensure downstream water users are not paying for water they are unable to access.
- Protecting existing allocations is vital including the provision for future business growth.
- It is understood that unallocated water with flow conditions remain, to ensure that existing title holders are not impacted by taking extra flow when the Logan River is in high flow (for water harvesting), which exists as part of the temporary allocation in the Logan River.
- Looking for opportunities for new unallocated water reserves is imperative for the future growth and long-term sustainability of agriculture and protecting allocations from urban development.
- The regulation of overland flow would be incredibly damaging to some agricultural businesses in this region, where overland flow is currently unregulated. Detailed consultation and measurement of the catchment would be required if the regulation of overland flow was implemented, to investigate any impacts dams that captured overland flow would have on a system.

Matters to be considered

Volunteer river management system - currently in place and all members agree this should be retained regardless of volumetric or area allocation. This system has always been used to ensure that all licence holders are able to access water, stock water at the very least, regardless of allocation. Often during periods of low rainfall, those at the bottom of the catchment rely on others at the top end being on restrictions or a ban to allow water to flow through to them.

Water trading - all members in favour of water trading but very clear that allocation should always

⁴ Queensland. Department of Environment and Science and Queensland. Department of Regional Development, Manufacturing and Water (2020) *Water planning science plan 2020-2030*. Brisbane: Queensland Government.

remain with a landholder in the catchment, and for agricultural use. The concern was that there may be profiteering should the trading be opened to outside parties, to the detriment of the farming community. Feedback from some local producers in the Logan River Water Plan area, have indicated that trading should be restricted to those who are making use of their allocation rather than someone possibly storing for profit. There are often voluntary restrictions placed on licence holders within the catchment. Several licence holders along the river are no longer farming commercially and therefore these allocations would present an opportunity for those with higher water use requirements.

Allocations - The Mary River Water Plan Review indicated a figure of 6mL/hectare was given to licence holders as part of the Mary River review. Although there has not been any measurements or data facilitated at this stage of the water plan review, there is concern around these figures given that some dairy farmers are utilising 10-12ML. It is vital that current measurements are thoroughly investigated as part of this process, to ensure an appropriate figure on what is an average and reasonable usage for dairy farms.

River health - Farmers in the Albert River region, request to see the volunteer management system continue. The Albert River is currently looked after by landholders and the health of the system is important to all. This review needs to consider all factors that affect the ecosystem and long-term health of the river, for which many farm businesses rely on.

Water harvesting - Being able to water harvest in times of high flow is important. This should be an allowed practice for licence holders without a cost burden or separate licence. Feedback from some farms have indicated that water harvesting should not count towards their licence allocation and look at incorporating threshold to be met before water harvesting could take place, that aligns with environmental flows to ensure the protection of river health.

Water budgeting - With the water allocations running over the financial year, this adds a greater level of difficulty to water budgeting when the allocation ends during peak rye grass production season, which is of concern to dairy farmers but extremely important for this review to investigate.

Purpose of licence - The idea of changing the licences to a purpose of any rather than purpose of irrigation has been discussed. Whilst members felt this could be beneficial, they were keen to ensure that a purpose of any was still restricted to any agricultural use, not just any purpose.

Opportunities

The upcoming suite of water plans require all member groups to be involved. Intensive and direct consultation is required to get a good representation of views and educated feedback. The timing of these plans occurring within a short period of one another, as we are aware have occurred due to various factors, with some now at the peak of their iteration and can no longer be extended. As such, it is important that a thorough investigation of the Logan water plans is undertaken, and negotiations implemented to help keep businesses viable, through both affordability and surety of water security.

Given the complexity and added modelling required for the water planning process, a suggested policy opportunity would be to amend the time frame to begin in depth research mid-way through the water plan cycle, so that all data necessary is available at the commencement of the consultation period. QFF are aware that the Logan Water Plan does not have this option, but it could be seen as a

lever to help adjustments to changes to water allocations and legislative changes to water for the future and help ease the transition of complex water plans for the agriculture sector.

A delegation from the Minister to enact specified research required to assess water security in each water plan area, may alleviate some concerns as we transition through the energy transition to renewables and integrate climate change modelling into the impacts of available water through extreme weather events. Currently the iterations of the water plans are done ad-hoc dependent on what is happening in the region, which can be extended out to twenty years, however doing mid cycle reviews will give more trust and transparency of the process to those dependent on water for their businesses.

Example:

Water Plan (Mary Basin) 2006 expires in May 2024 and will be replaced prior to expiry. Draft plan released on 22 February release and submissions closed on 28 April 2023. (This is a relatively tight time frame for detailed data to be integrated into a plan that has the potential to impact agricultural businesses and production). Numerous consultation opportunities were set up because of the changes that required intensive consultation in the Mary Basin Water Plan area.

As a result of the Mary Basin Water Plan, various questions were raised and addressed throughout numerous discussions that related to pumped hydro, public processes, and consultation, how climate impacts will be considered, protection of existing entitlements and water security, cultural values, and dam release strategies.

All these questions are relative to the water plan area, however, also require extensive research and modelling, and consultation, that potentially will go outside of the scope timeframe.

Solutions

- Extend consultation time frame, whilst engaging in feedback throughout the whole process.
- Identify groups to be impacted and why. E.g., change from area-based licences to volumetric licences.
- It is important that historical use of irrigation water, environmental water and cultural water along with climate modelling that will be utilised to determine the volumetric conversion, is clear and transparent for water users to understand. This will allow for a less disaggregated community and one that is engaged and informed.
- Increase in water allocations, that maybe extended to environmental water because of climate modelling, needs to be explained thoroughly to ensure all riverine ecosystems remain sustainable and healthy.
- Education required on aspects of environmental and cultural water, including the rationale behind the collection of water data and metering.
- Evidence based science used for upcoming water plans that incorporates climate change and hydrological modelling requires a clear and educated consultation process.
- Details of the process, timeframes, and maps required online in a stop light system to where process currently lies, and when consultation is taking place.
- The impact of legislative changes to the Logan Basin Water Plan and possible options for farmers to access farm business resilience program or Drought preparedness Grant Scheme to assist growers help prepare to mitigate the risk of reduced water security. This could be an economic

option to aid growers in managing less water. It is also imperative to investigate the rigid nature of such programs, and the complex application process to help enable landholders to access these grants.

Co-benefits

- More confidence from the community if seeking involvement and providing detailed education on matters that the community may not understand.
- Bringing communities together to be given the opportunity to speak and get involved in the process, allows greater confidence in the Government, and enables a degree of ownership in the process which has not been seen before.
- Allows the Departmental process to continue with ease and stay on track for current deadlines.
- Possible utilisation of recycled water in water constrained areas, that can be utilised in industries such as Nursery, especially for those are being encroached by urban development.

Summary

Ownership, transparency, trust, and education are the key components to undertake stakeholders through the water planning process, especially in areas that have a variety of uptake and different applications of water.

The first step of the water planning process needs to be a clear plan and engagement pathway for all stakeholders at the beginning, and identifying gaps in the information piece that needs to be explained thoroughly to ensure stakeholders are provided with sufficient time and resources to be able to give an educated response and understand what the process means for them.

Many businesses that are utilising water that are either have area based or volumetric licences do not necessarily understand the implications of change and for those that are not on either, need to have these discussions on a case-by-case basis.

In summary there are a wide range of water plans coming up for renewal over the next few years, that require an in-depth amount of research and modelling to be undertaken to ensure that as a state we are accountable for the water we use.

Delaying some future water plans, to ensure those that are in water plan areas that require more intense investigation need the time allocated, to ensure that ownership, transparency, and education of the water planning process is done correctly.

This will help to minimise conflict within different stakeholder groups, provide a basis for ongoing involvement for all relative stakeholders that will help towards understanding the outcomes for all.

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

Yours sincerely

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Chief Executive Officer



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