



QUEENSLAND
FARMERS'
FEDERATION

Water Amendment (Restoring Our Rivers) Bill 2023

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The united voice of
Queensland agriculture

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This submission is provided to:

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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, eggs, 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

QFF welcomes the opportunity to provide comment on **Water Amendment (Restoring our Rivers) Bill 2023**.

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

Overview

The Water Amendment (Restoring our Rivers) Bill, 2023, was introduced to amend the *Water Act 2007* and the *Basin Plan 2012* to implement the Basin Plan in full, which includes the recovery of 450 gigalitres of additional environmental water and expand the type of projects that can deliver the Basin Plan target. It will also support the implementation of the Murray-Darling Basin Plan to improve transparency and integrity of the water markets in the Basin.

Additional to this, this Bill aims to repeal the 1,500 GL cap on Commonwealth water purchases, provide additional time for Basin States to deliver Sustainable Diversion Limit (SDL) Adjustment Mechanism projects, enable the Inspector-General of Water Compliance to determine SDL compliance and require actions plans, and provide a roadmap for the delivery of constraints relaxation projects across the Southern Basin.

It is important to note that irrigation plays a major role in farming activities in the basin region, and so too does the water requirements of our irrigators. QFF represents the interests of 20 peak state

and national agriculture industry organisations including Cotton Australia, who represent 1,500 cotton growers, many of whom operate with the Murray-Darling Basin.

This submission supports Cotton Australia's Submission and the points that have been raised that impact irrigators in the Murray-Darling Basin area.

Key Issues

- Delivery of the Basin Plan.
- Meeting the SDL's.
- Complementary water measures.
- Repealing the statutory 1,500 GI Cap on buybacks.
- Extending timeframes on the 605 GI, Supply Projects.

Delivery of the Basin Plan

The Federal Government has committed to Basin Plan, according to the numbers. Through the different iterations of all sides of politics since 2012, there has been many and varied views on buybacks, the numbers, and impacts on rural communities, however one core component, in which QFF supports, is the delivery of the Basin Plan in full.

There has been a constant rhetoric about the number since the release of the Basin Plan, and the impact on those communities, especially smaller irrigation-based communities is constantly under threat, as the Government continues to focus on the numbers and not the livelihoods of those communities.

QFF in support of Cotton Australia's submission, believe that a holistic approach in managing the Basin is necessary to ensure the viability of the small towns that are supported by Basin are maintained, along with looking at how the Basin Plan can optimise environmental outcomes, whilst minimising impacts to irrigation communities.

Placing unrealistic 'numbers' on smaller communities, will notably lead to a decay in regional towns and a decline in our agricultural sector. QFF looks to see a more holistic approach in delivering the Basin Plan, that minimises the negative social and economic impacts associated with the delivery of the environmental outcomes intended to be delivered in the Basin Plan and focus on those communities that would be at most risk from the 'numbers'.

Meeting the SDL's

The Murray Darling Basin Plan sets limits on the amount of water that can be taken from the rivers for town, industrial and agricultural use in the Basin. These limits are known as Sustainable Diversion Limits. SDLs are set at Basin-wide, catchment and aquifer scales. The Murray-Darling Basin Authority has estimated the Basin-wide SDL for surface water is 10,945 gigalitres per year (GL/y)¹. At the catchment scale, SDLs are implemented through Basin States water resource plans.¹

As part of the Bill, there are various components that are to be amended to the *Water Act 2007*, that implement the legislative aspects of the agreement to deliver the Basin Plan in full and outlines the sustainable diversion limit adjustment mechanism and its implementation.

¹ [Sustainable Diversion Limit adjustment mechanism and its implementation - DCCEEW](#)

Schedule 2 of the Bill allows for amendments to three chapters of the Basin Plan, including:

In Chapter 6, the Inspector General to determine 'reasonable excuse' claims brought forward by Basin States and may appoint an independent auditor too audit calculations of the MDBA when proposing SDL adjustments. Further amendments in Chapter 7, propose the MDBA propose adjustments to the SDLS under section 23A of the Water Act on the basis of a new class, being new acquisitions of held environmental water (HEW) which was previously used for consumptive water. This then requires the MDBA to prepare constraints reaction implement roadmap by 31 December 2024; and postpone the requirement for the MDBA to make a final determination under the Sustainable Diversion Limit Adjustment Mechanism to 31 Dec 2026. Amendments to Schedule 6A to incorporate the new class, being new acquisitions of HEW.

As part of the Bill, the Basin Plan specifies the surface water and groundwater long-term average SDL's for the entire MDB as well as for each surface water and groundwater resource unit and water resource plan area. This is essentially the maximum amount of water that can be extracted in a year. The original 'bridging the gap' target was 2,750 GL/y, following amendments was changed to 2,075GL/y in 2018.² With the additional 605 GL/y increase, the Murray-Darling Plan is expected to deliver 2,680 GL/y of water to the environment each year.

In order to reach this proposed number, maximum SDL's have been set for each catchment within the Basin. This target is to be partially met through buyback and efficiency measures. It is to be noted, that over the past three annual reporting periods, the actual total water take across the Basin has been significantly below the allowed annual take as determined by the SDLs. This means that the MDB Plan is achieving its goal of reducing Diversions to a determined level, and increasing the volume of water for the environment, even though the full level of acquisition has not occurred. For the delivery of the Basin Plan in a strict time frame, is therefore unnecessary, and a holistic approach as per previous comment, should be made to ensure Basin communities are protected.

QFF, in support of Cotton Australia strongly recommends that this Inquiry question both the Authority and the Inspector-General on the actual take versus the allowed take over the past three reporting seasons. It is crucial to recognize that the Plan is already meeting its primary objective of managing water take at or below the Sustainable Diversion Limits.

Complementary water measures

One of the major impediments to the Basin Plan has been the almost sole focus on hydrology. Prior to the implementation of the Plan, the Federal Government completed two rounds of the Sustainable Rivers Audit. These audits measured the health of the river system across many sites in the basin, based on various metrics, including hydrology. To use only one metric measurement, it is in contradiction of the methodology of identifying distinct key metrics, such as hydrology, fish, and macro-invertebrates to assist in determining river health.

QFF supports Cotton Australia's position that the focus needs to move away from additional water recovery and invest in activities and structures (complementary measures), that would see greater environmental outcomes from the existing volume of environmental water. This complementary measure can also include cold water pollution, fish passage delivery, restoration of riparian vegetation, and removal of feral pest species. All these measures will see to beneficial outcomes to the Basin. However, as such, this Bill has not included any measures to adopt a holistic approach on management

² [Progress on Murray-Darling Basin water recovery - DCCEEW](#)

of the Basin or a forward looking future of the Basin Plan, including these factors. Unfortunately without incorporating such measures, in the future of the Basin, through amendments to the Bill, we will continue to see the Murray-Darling Basin struggling for air for many years to come.

Repealing the statutory 1,500 GL Cap on buybacks

QFF, supports Cotton Australia in its opposition to 'buybacks' as the primary pathway for water recovery. It is widely known that 'buybacks' have taken away water from the agricultural sector, which has reduced the overall volume of water left to simultaneously still produce the same amount of food and fibre, without offsetting the on-farm efficiency projects already in place. This can be detrimental to farmers that rely on irrigation for producing their products. This however will differ, based on the different commodities produced, and water required.

It is not just the impact on the productivity levels due to available water, but reducing water has a direct impact on farm employment and the economic flow through rural communities. The reduction in employment sees a flow on effect, which inevitably leads to losses in population in regional and rural communities, which can be devastating and potentially unrecoverable.

Buybacks have been detrimental to the agricultural sector that requires irrigation to be viable, therefore instead of continuing to acquire water, there needs to be strategic investments made around complementary measures, which would deliver measurable environmental outcomes.

QFF supports that the existing 1,500 GL cap on buybacks must be maintained, to not only protect the farming communities, but also allow the government to fulfill its local recovery targets, for the 'bridging the gap' 49GL.

Extending timeframes on the 605 GL, Supply Projects

QFF supports the Bill's intent to provide extended timeframes, and more flexibility for the 605GL supply projects. QFF supports Cotton Australia's point on ensuring that the as a minimum the 605GL is achieved. As previously noted, complementary measures need greater emphasis and a clear framework on implementation as part of this Bill, which will prioritise the environmental gains achieved whilst supporting local communities, that direct buybacks do not provide.

QFF also suggests that the timeframe needs to be extended past two years to undertake these projects, efficiently, effectively and protect the stakeholders utilising water in the Murray-Darling Basin well into the future.

Recovery of additional 450GL of environmental water

Buybacks have caused detrimental impacts to regional communities over time, and if they are to be pursued again, will continue to lead to a reduction in production of food, fibre and foliage, which will see an increase in food prices, and a further demise in communities. Recovering a further 450GL does not only impact the agricultural sector, it also affects every Australian, who either lives in the Basin Plan area, and requires food and water security for the future.

The numbers allocated in this buy back of environmental water need to be looks at holistically, and not as a Southern versus Northern Basin issue. QFF seeks to see better ways of achieving environmental outcomes than the acquisition of 450GL from landholders, that will inadvertently cause an avalanche of associated negative impacts to the whole of Basin area, including every community surrounding it.

Conclusion

The Government needs to focus on alternative options, including on-farm savings and move away from buybacks. Without considering alternative options and listening to the communities that have spent years working together, does not reflect the environment in which the government is trying to protect.

There are many alternatives to recovering water, that do not include the destruction of communities which ultimately takes away the productive capacity for businesses. On farm and off farm efficiency projects are only one of the many items that will help deliver the pathway for environmental water recovery, rather than the unconsidered approach of trying to implement water buybacks before all other options are investigated.

QFF does not wish to see history repeat itself, whereby communities relying on irrigation and agriculture are adversely affected in numerous ways. Non-water related measures need to be considered by the government, such as improving fish passage, helping to reduce pollution in dams, and both on farm and off farm efficiency projects.

It is imperative that the Government listens to the community, implements alternative environmental water saving options, including non-water related measure that maintain productive water, and focus on restoring communities, not destroying them, though buy-backs.

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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