



QUEENSLAND
FARMERS'
FEDERATION

Restoring our Rivers: Delivering the Basin Plan 2012 Draft framework for delivering the 450 GL of additional environmental water

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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, cane, 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 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 the Australian Government, Department of Climate Change, Energy, the Environment and Water; Restoring our Rivers: Delivering the Basin Plan 2012, *Draft framework for delivering the 450 GL of additional environmental water*.

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

Executive Summary

QFF made a formal submission on the 4th October 2023, regarding the Water Amendment Restoring Our Rivers) Bill 2023,¹ and in this submission, QFF will build on the previous responses.

As outlined in the draft framework, The *Water Amendment (Restoring Our Rivers) Act 2023* commenced on 7 December 2023 to provide more accountability to deliver the Basin Plan in

¹ <https://www.qff.org.au/wp-content/uploads/2023/10/20231004-QFF-Submission-to-Senate-and-Standing-Committees-on-Environment-and-Communications-Water-Amendment-Restoring-Our-Rivers-Bill-2023-WEB.pdf>

full. The draft framework for delivering the 450 GL outlines 3 new programs that the Australian Government has proposed it will establish to deliver the 450 GL target.

QFF represents varied interests in the Queensland Murray Darling Basin, that sits within the Murray Darling Basin Plan area, and as such our summary points will cover the below programs that are aimed to deliver the 450 GL target:

1. Resilient Rivers Program.
2. Voluntary Water Purchase Program.
3. Sustainable Communities Program.

It is important to note that the various programs that are being established listed above in 1-3, do not clarify or acknowledge the issues previously highlighted by QFF, nor do they contain solutions that reflect the impact that delivering water back to the MDB, has had on agricultural sector in Queensland.

The previous mismanagement of Basin resources and an inadequate water market, as noted in the 'ACCC, on Murray-Darling Basin water markets inquiry, Interim report',² has been a large contributor to the destabilising of the MDB, and as such it can be clearly shown that the Australian Government, is still years away from implementing a plan that was established in 2012.

Summary

There are a numerous issues that underpin the effective transition of the three programs to succeed in delivering the proposed 450 GL of water in the MDB, which are:

Prohibitors to delivering the 450 GL in full:

- Increased transparency of foreign ownership of Australian Water Assets.
 - The current act for which Register of Foreign-owned Water Entitlements are currently managed under, is proposed to be encompassed under the new Foreign Investment Reform (Protecting Australia's National Security) Act 2020 (Cth). *The existing Acts will be abolished when the new scheme commences, which is to be undertaken by 1 January 2025.* This Act amalgamates existing registers of foreign interests in Australian land and water entitlements and contractual water rights. This also expands the requirements to foreign owners of commercial land and exploration tenements and new business questions that require foreign investment approval. It has been proposed that Foreign-owned Water Entitlements will continue to use the same definitions, see the same reporting obligations, and require public annual reporting at an aggregate level using data from the Register.
- Compliance by foreign owners of water entitlements in accordance with the *Register of Foreign Ownership of Water or Agricultural Land Act 2015* (the Act).

² [Murray-Darling Basin water markets inquiry - final report | ACCC](#)

- A variety of jurisdictions occupy the Murray Darling Basin, which negatively impact water markets.
 - The ACCC acknowledges that governance issues impact water markets. It is vital that the current ineffective decision making, fragmentation of roles within the governance frameworks and conflicting roles and functions of the different agencies do not stifle the role of water trading for Queensland farmers located in the Northern Basin region.³
- QFF does not support the automatic transfer of over-recovered water purchased under the Bridging the Gap purchase program to the 450GL Recovery Target.
 - As part of the *Water Amendment (Restoring Our Rivers) Act 2023* which commenced on the 7 December 2023, the Basin Plan specifies the surface water and groundwater long-term average sustainable diversion limits (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.⁴ The purchase of this water was undertaken as a "No Regrets" policy of the government of the day, and an option should be open for the volume to be returned to those catchments where it was originally obtained.

Rules-based changes

QFF supports Cotton Australia in its position concerning the Australian Government's proposal to implement rules-based changes as a method to recover water entitlements. QFF cannot rule out the current proposals at this stage, however, given the feedback from our members, a rule-based change would be unlikely to be accepted.

Recovery methods, as noted in QFF's prior submission, in order of priority are:

- Off-farm efficiency projects;
- On-Farm efficiency projects;
- Lease arrangements;
- Water entitlement purchases;
- Rules-based changes.

The move towards a rule-based recovery is a significant shift away from the fundamental principle of the Basin Plan, which notes that water recovery should be from willing participants and for payments to reflect market price.

³ [20201030-QFF-Submission-to-ACCC-MDB-Markets-Inquiry-Interim-Report-WEB.pdf](#)

⁴ [Microsoft Word - 20231004 - QFF Submission to Senate and Standing Committees on Environment and Communications - Water Amendment](#)

Water policy requires stability of regulation. The management of water entitlements requires stability of regulation. The uncertainty created by the constant change's limits people's ability to invest, reduces productivity, and creates an artificial market for the same commodity, that is water.

To continually change regulation governing water policy and entitlements, displaces certainty in the water policy framework, which underpins the Basin Plan.

Over recovery

QFF in support of Cotton Australia, does not support the automatic transfer of over-recovered water that has been purchased under the Bridging the Gap program, to the 450 GL recovery target.

The numbers allocated in this buy back of environmental water needs to be looked 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

QFF fully supports the aim to look at options to facilitate buybacks, which includes transparency, regulation, competitiveness, and efficiency, but also ensuring allocations and entitlements are not overregulated, which will lead to the eventual erosion of the very aims that the framework seeks to achieve.

To achieve the outcomes from the proposed 3 new programs that the Australian Government will establish to deliver the 450 GL target, will need to address underlying issues that have been raised in this submission. This includes a fair and equitable market, on-farm and off-farm efficiency projects, lease arrangements, water entitlement purchases.

Without consistency, transparency, efficiency, and a cost-effective holistic approach to delivering the Basin Plan, that incorporates the future interests of regional communities, Queensland farmers will continue to see a lack of confidence in the future of water recovery measures when a fragmented approach continues to exist. Flaws in a framework that continues to be fragmented, could possibly push a valuable resource to unsustainable levels, as has already been shown in southern states.

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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This submission is provided by the Queensland Farmers' Federation

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