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30 August 2018

Chief Executive

Attn: Cape York Water Plan Coordinator

Department of Natural Resources, Mines and Energy

28 Peters Street

PO Box 156

Mareeba QLD 4880

(email: WPCape@dnrme.qld.gov.au)

Dear Plan Coordinator

Re: Submission on draft Cape York Water Plan 2018

AgForce Queensland Farmers (AgForce) is the peak rural group representing beef, sheep & wool and grain producers in Queensland. The broadacre beef, sheep and grains industries in Queensland generated around \$7.2 billion in gross farm-gate value of production in 2016-17. AgForce exists to facilitate the long-term growth, viability, competitiveness and profitability of these industries. The producers who support AgForce provide high-quality food and fibre to Australian and overseas consumers, manage around 40 per cent of the Queensland agricultural landscape and contribute significantly to the social fabric of rural and remote communities.

Thank you for the opportunity to provide a submission on the draft Water Plan for Cape York Peninsula (the Cape). AgForce strongly supports having representation from primary producer interests, both pastoral and farming to contribute sectoral views within water planning processes and has appreciated having representation through Graham Elmes on the Regional Cape Water Consultation Group.

Past consultations, such as for the Wild Rivers, World Heritage and vegetation management processes, where the wishes of the people of Cape York have been ignored or not acted upon, have produced a loss of trust in governments. It is vital that local community-identified aspirations and concerns in relation to water planning and management are understood and met.

As we stated in our submission to the Statement of Proposals, water resources are critically important to the survival and growth of many agricultural businesses and the livelihoods of farming families in the Cape and so the security and certainty of access to water is paramount. That submission should be reviewed in finalising this draft plan.

AgForce supports the Queensland Government’s water planning process and use of objective, scientific information to guide any decisions about making water available on a sustainable basis. We support the development of a Water Plan (WP) for the Cape and are looking to the final Plan to deliver secure and sustainable access to water to sustain and grow agriculture - delivering the diverse economy needed for the Cape to thrive into the future, balanced with the protection of the unique environmental and cultural values of the region.

We don’t believe that this balance has yet been achieved in the draft and draw your attention to where improvements could be made. The submission will provide comment and specific recommendations in the order of the different Parts of the draft Water Plan and draw on other planning documents as needed.

A summary of the specific recommendations is:

1.	Recognition that the natural state of watercourses, lakes, springs and aquifers may change because of the use of water should be applied to the environmental outcomes sought.
2.	Outcome areas defined in sections 17 to 20 should be equally robust, to avoid embedding a bias in the decision-making process.
3.	The scientific information about the volumes of water required to maintain ecosystem functioning in the Cape, while enabling the sustainable diversion of additional water reserves for economic development purposes and facilitating economic growth, should be further developed and publicised.
4.	The environmental flow performance indicator of maintaining over 97.5 pc of median pre-development annual freshwater discharges in all catchments should be revised on a catchment by catchment basis to increase flow harvest, including for high flow scenarios.
5.	The generic 50 ML limit on overland flow harvesting works should be revised upwards on a catchment by catchment basis where sustainable environmental outcomes permit.
6.	Further justification for a blanket licensing of S&D takes from a watercourse, lake or spring for use on a non-riparian land parcel should be provided or the provision removed.
7.	To enable further economic opportunity AgForce supports an increase in the general reserves available for irrigated agriculture for non-indigenous residents, through a proportional increase in the existing identified reserve pool, and/or in conjunction with an increase in surface water diversions. Negotiation requirements with CYPHA license holders should have to be reasonable.
8.	Further consideration be given to increasing the water available in the Lakeland area, through establishing capacity in the Plan to account for new sources of water, including incorporating the results of the feasibility study funded by the National Water Infrastructure Development Fund.
9.	Requirements on applicants for general and CYPHA reserve water should be streamlined as much as possible, not duplicate other regulatory frameworks and be consistently applied.

10.	Restrictions on the use of CYPHA reserves that unnecessarily constrain their use should be removed.
11.	Information about volumes of water taken, future consumptive demands for water or water use efficiency of individual entitlements should not be published, to protect the privacy and commercial interests of the people involved.
12.	The Department should continue to proactively inform water users on the Cape about water planning methods and what their rights and obligations are under the new framework.

Purposes of the Plan

The Cape York Regional Plan of August 2014 acknowledges the important role that agriculture plays in the Cape’s economy, the existing strengths in cattle grazing and breeding as well as in horticulture, and the potential for increased productivity and sector expansion where improvements can be made to reliable water and transport access and to supply chain efficiencies.

As a key principle AgForce does not support any changes to water management that reduces entitlement holder confidence in the reliability of water supplies, particularly for stock and domestic uses, or represents a significant risk to the long-term sustainability of those water resources and associated ecosystems.

Tailoring water allocation and management strategies to each of the 15 major catchments in the plan area is a sensible approach as the water needs and conditions will vary significantly across the catchments and local opportunities can be best promoted through targeted approaches. In contrast the draft WP includes a number of policies that take a blanket approach across most if not all catchments.

AgForce supports providing access to water resources to help Aboriginal people and Torres Strait Islanders achieve their economic, social and cultural needs and aspirations (s2(f)). In this they should be given the greatest opportunity to then use those resources, and also that the relative volumes of water provided are adequate and proportional to that opportunity also provided to non-indigenous residents.

Plan outcomes

The Cape York Peninsula Land Use Strategy (CYPLUS) indicated¹ land areas physically suitable for broadacre cropping; encompassing some 1,812,000 ha suitable for cropping of sorghum or maize and large areas suitable for pasture improvement (3,445,300 ha for high input and 4,448,400 ha for low/medium input pastures respectively). Further, the Queensland Government’s more recent Land Use Audit² suggested 1.5 pc or 188,285 ha was potentially suitable for broadacre cropping and 625,537 ha was suitable for sown pastures, with a total area suitable for grazing of 8,737,033 ha. Large land areas suitable for either sugarcane or horticulture were also identified in that Audit.

The draft Plan (s16) properly recognises that water should be allocated and managed in a way that recognises that the natural state of watercourses, lakes, springs and aquifers may change because of

¹ Briggs and Philip. 1994. Soil Survey and agricultural land suitability of Cape York Peninsula. CYPLUS

² Department of Agriculture, Fisheries and Forestry, May 2013. Queensland Agricultural Land Audit. State of Queensland

the taking of, and interfering with, water. That is, these are ‘working catchments’ delivering a range of socio-economic and environmental outcomes.

This recognition should also be applied to the Plan purpose of providing a framework for reversing, where practicable, the degradation of natural ecosystems caused by the taking of, or interference with, water (s2(g)), rather than attempting to apply a pre-development baseline. The concept should also be applied to the consideration of environmental outcomes, such as in maintaining flow patterns, and not seek to return the Cape to a pre-development or ‘natural’ state.

Recommendation: Recognition that the natural state of watercourses, lakes, springs and aquifers may change because of the use of water should be applied to the environmental outcomes sought.

The Plan is aimed (s16(b)) at achieving a balance between economic, social, cultural and environmental outcomes and outlines what these various outcomes are intended to be. In any ‘balancing’ it is important that outcome areas are defined in sections 17 to 20 equally robustly, to avoid embedding a bias in the decision-making process. AgForce recommends that the language around the economic outcomes are strengthened in the draft, specifically:

- to effectively mirror the wording of s20 (1a) that seeks to minimise changes to environmental flows by resource management decisions – include *‘to maximise the availability of water supporting economic activity and agricultural growth and development’*. This wording then facilitates a real balancing of outcomes.
- Alternatively, on s17 (1c) – reword to *‘to make water to which this plan applies available to support economic development through the growth and expansion of industries dependent on water resources in the plan area’*, as per the wording of s17(1e) and s18(c). This wording is then more consistent with that already applying in the neighbouring Mitchell catchment (that Plan s12(d) and (g)).

Recommendation: Outcome areas defined in sections 17 to 20 should be equally robust, to avoid embedding a bias in the decision-making process.

The WP also has a role in promoting improved understanding of the health and flow requirements of ecosystems, water requirements of Aboriginal people and Torres Strait islanders and community socio-economic benefits and impacts of climate change on resource availability (s16(c)). This is supported by AgForce as a better understanding of these needs will enable improved water allocation as well as targeted and sustainable socio-economic opportunities to be delivered.

Proposed strategies and measures to achieve outcomes

The draft plan calls (s21(1)) for all allocations and licenses to be measured by 30 June 2020 and 2022 respectively. Water used in the state for stock and domestic (S&D) purposes is negligible compared to Queensland’s total water use – just 0.17 pc of total runoff. Water used for S&D purposes is a basic landholder right with intrinsic limits and should not be tradeable, metered (unless voluntarily), nor subject to water pricing regimes. Licensing of S&D takes is only required where the resource is at risk of being overused. We support removing the requirement for a S&D license within the Duck Farm UMA.

Sustainable grazing capacity of various land types is well known by the government, as is the required livestock water intakes under a range of environmental conditions. So, the potential total

take of this water can already be reasonably accurately estimated. The additional benefit derived from metering of any S&D uses in terms of improved water planning and management does not justify the additional cost imposition on water users.

In contributing to socio-economic outcomes (s22), AgForce would support further developing of scientific information about the volumes of water required to maintain ecosystem functioning in the Cape while enabling the sustainable diversion of additional water reserves for economic development purposes and facilitating economic growth (the s17(1c) outcome). The need for more information was also identified in the environmental assessment report³. The raw data, information and analysis should also be published within 5 years of Plan commencement, as for the other identified reports on outcome achievement.

Recommendation: The scientific information about the volumes of water required to maintain ecosystem functioning in the Cape, while enabling the sustainable diversion of additional water reserves for economic development purposes and facilitating economic growth, should be further developed and publicised.

Performance indicators

Environmental flow performance indicators

There is a need for clear, objective, measurable indicators of environmental outcomes upfront so that the definition of outcomes for environmental flows can be clear, targeted and efficient. This is important in getting the balance right between environmental and consumptive uses.

Schedule 7 in the draft WP outlines the environmental flow objectives intended. The Statement of Intent document of June 2018 indicates an intention to deliver very strong levels of environmental protection. This includes maintaining **over 97.5 pc** of median pre-development annual freshwater discharges in each of the 15 catchments. This leaves just 2.5 pc of flows available for existing entitlements and unallocated volumes. This volume of water likely is within the error range of the hydrological modelling and so is hard to defend objectively.

It is acknowledged by the government that this is a 'conservative, precautionary' level due to inadequate scientific understanding of the system and current low demand for water. These settings are also intended to leave a 'significant scope' to buffer any implications of climate change on water availability, even though predicted flow changes under high emissions scenarios were found to be marginal (p 9 of Statement of Intent). This finding was also confirmed by CSIRO for the neighbouring Mitchell catchment.

On the day prior to the end of the submission period, the CSIRO released its Water Resource Assessment for the neighbouring Mitchell River catchment⁴. The CSIRO study looked at the interplay in changes of flow regimes on key ecological assets and habitats in that catchment. These assets included a range of fish species, wetlands, waterholes and prawns.

³ DES 2018 Cape York Water Plan: Environmental Assessment Report. Department of Environment and Science, Queensland Government, Brisbane.

⁴ Petheram C, Watson I, Bruce C, Chilcott C (eds) (2018) Water resource assessment for the Mitchell catchment. A report to the Australian Government from the CSIRO Northern Australia Water Resource Assessment, part of the National Water Infrastructure Development Fund: Water Resource Assessments. CSIRO, Australia.

Figure 7-3 of the Report outlines the CSIRO assessment at the end of system node across a range of low (200 ML/day) and high (1,800 ML/day) flow water harvesting scenarios, taken over a 20-day period. At low flows, harvesting of 1,200 GL, or about 9 pc of end of system flows (about 13,000 GL), could occur with minor impacts on the ecological assets. At the high flow harvesting scenarios, up to 2,400 GL or about 18.5 pc of end of system flows, could be harvested with only minor environmental impacts. At that harvest rate there was negligible impacts on barramundi, wetlands, waterholes, salt flats and prawns. Further, for this flow scenario, 5pc of end of system flows could be taken with no or negligible impact on any of the tested assets – and being difficult to distinguish from modelling errors.

The state government is encouraged to review this report and update the draft Cape WP in light of the findings of that Assessment and its methodology. While not directly comparable it is concerning that such differences in environmental flow requirements can be reported for neighbouring Gulf catchments and that a cap of 2.5pc would be blanket applied across all Cape catchments. The Mitchell assessment delivers evidence to support further efforts to progress agricultural development and it is important that protections for environmental outcomes are not overengineered to the detriment of sustainable economic opportunity for the people of Cape York.

Recommendation: The environmental flow performance indicator of maintaining over 97.5 pc of median pre-development annual freshwater discharges in all catchments should be revised on a catchment by catchment basis to increase flow harvest, including for high flow scenarios.

Further to an immediate reconsidering of the proposed environmental flow objectives and acknowledging there are scientific and hydrological knowledge gaps⁵, it is important that these gaps are addressed in a timely manner and sustainable amounts of water released - alongside other incentives or supports for economic growth and diversification. The included water allocation security objectives should also be revisited in light of improved information as they are currently weaker than in other water plan areas, and relative to the strength of environmental flow objectives.

Limits on taking and interfering with water

The Plan proposes limiting the harvesting of overland flow (where it is not licensed or used for S&D purposes or from existing works that are authorised) to works of not more than 50 ML outside of the Normanby catchment. This is in line with the limit in the strongly developed Fitzroy catchment and contrasts with the existing limit of 250 ML in the neighbouring Mitchell and the Gulf catchments.

Smaller 50ML storages have bypass flows through spillways often on a yearly basis, with ongoing repair required to maintain their integrity. Larger storages can be constructed to a size that will limit the occurrence of overflow through spillways and larger facilities are more economical in terms of the earthworks required relative to storage capacity. Larger storages can help address sediment runoff in Reef and Gulf catchments and holding water all year round in some stretches of waterways would allow streambanks to maintain constant ground cover further reducing sediment flow. Leaky weirs are also a tool in addressing gully erosion and should be considered in the final Plan.

⁵ Page 11 of the Statement of Intent

Where sustainable environmental outcomes permit, this generic 50 ML limit should be revised upwards on a catchment by catchment basis within the Cape, e.g. Coleman, Holroyd and Archer.

Recommendation: The generic 50 ML limit on overland flow harvesting works should be revised upwards on a catchment by catchment basis where sustainable environmental outcomes permit.

AgForce notes that the draft plan (s31) proposes to require land owners under s103 of the *Water Act 2000* to have a license for the take of S&D water from a watercourse, lake or spring for use on a non-riparian land parcel. The Act prohibits (s96) a Plan from limiting take of S&D water by an owner of land on which there is water collected in a dam or by an owner of land adjoining a watercourse, lake or spring. Our position is that licensing of S&D takes is only required where the resource is at risk of being overused. As such we do not support this provision in areas where the water resource is not at risk in the Cape and so this blanket requirement should be removed. Adequate justification for its inclusion has not been presented in the plan documents, e.g. P19 of the Statement of Intent.

Recommendation: Further justification for a blanket licensing of S&D takes from a watercourse, lake or spring for use on a non-riparian land parcel should be provided or the provision removed.

We also note that s51 relating to the proposed need for a water license to interfere with water in a defined watercourse to store water for S&D purposes requires the CE to ensure the proposed storage capacity is determined in the context of other existing water supplies and be no greater than 20 ML in the Endeavour, Jeannie or Normanby catchments, or otherwise 250 ML in other catchments. Such considerations must adequately allow for the high evaporation rates applicable in the Cape, the positive influence on sediment loads and allow adequate multi-year supplies to be stored.

Unallocated water and release processes

Relative distribution of reserves

The draft Plan through the Water Management Protocol (WMP) allocates 516,350 ML of water to the unallocated water (UAW) reserves (Table 1). Of this 485,300 ML (94 pc) is in a Cape York Peninsula Heritage Area (CYPHA) Reserve and may be granted to Aboriginal and Torres Strait Islander peoples through a CYPHA license process. The draft also allocates 25,000 ML towards a strategic reserve (about 4.8 pc of total UAW) and 6,050 ML of general reserve, from which irrigation water is available (about 1.2 pc of the total UAW reserves) to meet future non-indigenous economic water demands on freehold land.

While supportive of specifically providing socio-economic opportunities for Aboriginal and Torres Strait Islander peoples in the Cape, some of whom are AgForce members, under the current allocation proposal it is not clear where the real agricultural growth opportunities in the Cape are for non-indigenous people. For irrigated agriculture, 6,050 ML is equal to only about 500 ha of development across the entire Cape, at the Department's own 12 ML/ha license conversion factor.

Plan documents⁶ indicate that this volume is based on the proportion of non-indigenous freehold land, not area of potentially agriculturally-productive land, and the Department’s own assessment of ‘realistic’ opportunities for future demand. How ‘realistic’ was determined was not clarified but should be, given other reports estimating significant land areas suitable for agriculture, e.g. CYPLUS.

Table 1: Unallocated water reserve volumes proposed in draft plan documents

Catchment	Volume (ML) by Reserve type			General vs CYPHA (pc)	Median annual end-of-system flow (pc)	Current entitlement (ML)
	Strategic	CYPHA	General			
Archer	25,000	89,000	1,000	1.1	2.4	514
Coleman		56,000	200	0.36	2.4	0
Ducie		46,000	1,000	2.2	2.4	55
Embley		8,000	600	7.5	2.5	21,051
Endeavour		16,000	800	5.0	2.4	6,066
Holroyd		68,500	250	0.37	2.4	0
Jacky Jacky		1,500	0	-	2.3	0
Jardine		49,000	0	-	2.4	1,500
Jeannie		0	0	-	3.2	14,963
Lockhart		6,300	200	3.2	2.4	315
Normanby		16,000	2,000	12.5	2.4	21,708
Olive–Pascoe		48,000	0	-	2.4	0
Stewart		5,000	0	-	2.4	71
Watson		0	0	-	2.7	35,120
Wenlock		76,000	0	-	2.4	0

Further, s11 of the draft WMP enables further alteration in relative CYPHA and general reserve volumes and for water to be taken from the strategic reserve (s34) if CYPHA reserves are unavailable, such as in the Jeannie and Watson catchments. Agricultural projects of regional significance looking to access water would also have to firstly unsuccessfully seek an assignment of CYPHA entitlement from an eligible person in the catchment before accessing the strategic reserve volumes. The Plan should clarify that this requirement must be reasonable and so not deliver a right of veto to CYPHA license holders of mining or other significant development projects where cultural values could be appropriately protected and avoided.

Recommendation: To enable further economic opportunity AgForce supports an increase in the general reserves available for irrigated agriculture for non-indigenous residents, through a proportional increase in the existing identified reserve pool, and/or in conjunction with an increase in surface water diversions. Negotiation requirements with CYPHA license holders should have to be reasonable.

Lack of opportunity in the Normanby catchment for agricultural growth

The 2014 Regional Plan identifies Lakeland Downs as a Priority Agricultural Area (PAA) where agricultural land uses have priority. The Lakeland Downs PAA covers only about 6,400 ha, representing less than 0.05% of the Cape’s total land area. Nodes of Priority Agricultural Areas such

⁶ Statement of Intent P22

as Lakeland help protect agricultural industries, such as bananas, from being wiped out by exotic diseases (e.g. Panama TR4) and perform a strategic role for agriculture and should be supported.

In the draft plan the Normanby catchment has surface water set aside for future agricultural 'growth' of 2,000 ML, or only about 166 ha worth of irrigation. This does not meet current let alone future demand, indicating any support by the current draft WP proposals of the Cape York Regional Plan is very weak⁷.

According to the Statement of Proposals there are 32 surface water licenses (16,712 ML annually) and 22 area licenses (totalling 440.5 ha) for irrigation, mainly in the Normanby catchment. There are also 4,503 ML of groundwater authorisations for irrigation in the Normanby, Endeavour, Jeannie and Embley catchments. Further, the Statement identifies 23,557 ML of licensed watercourse storages, with 22,011 ML in the Lakeland area. Enabling permanent and seasonal relocation of underground water entitlements in the Lakeland and Cook UMAs is supported.

Agricultural water users at Lakeland have identified that they could immediately use 3 to 5 times more water than their current entitlements given the availability of soils suitable for irrigation in the area. They estimate that only about 10 pc of the suitable, cleared, freehold land (totalling 14,000 ha) near Lakeland is currently being irrigated and further development is possible with enabling government policies on water and vegetation management. Our submission to the Statement of Proposals contains further details about the opportunity around Lakeland.

The proposed plan includes management of overland flow (OLF) in all catchments with enhanced limits on new overland flow storages. In the Normanby catchment, where the draft WP indicates current overland flow development poses the greatest risk, there will be no new storages of any size able to be constructed without a license, unless the storage is for S&D purposes. The socio-economic impact assessment indicated this may have a 'low level' of effect and supports community social values. It acknowledged local concern about the requirement for an entitlement for any new storage which would have economic implications for developers.

There remains significant interest by irrigators in the Lakeland area in examining options for further surface water storages in the area, including from the Normanby, Palmer and Little Laura Rivers, if expansion to a viable irrigation area is to be achieved. This would point to establishing capacity within the Water Plan to effectively account for any new sources of water to enable further agricultural development to occur. This should be informed by the study of alternative surface water storages under the National Water Infrastructure Development Fund grant scheme. In the current draft WP, no specific proposals have been considered⁸ and this is a deficiency that should be rectified in finalising the Plan.

Recommendation: Further consideration be given to increasing the water available in the Lakeland area, through establishing capacity in the Plan to account for new sources of water, including incorporating the results of the feasibility study funded by the National Water Infrastructure Development Fund.

⁷ P8 of Statement of Intent

⁸ Page 8 of Statement of Intent

General reserve water release requirements

The WMP proposes (s14 – s17) to require the applicant to provide information about land suitability, cultural heritage values, and the social and economic benefits to local communities. While supportive of ensuring the water is used sustainably and to greatest effect, collecting the required information represents a significant cost to potential developers and should be streamlined as much as possible. It is noted that this type or level of information is not being required of the much greater volumes of water within the CYPHA reserve release, begging the question as to why it is needed for the relatively small general reserve volumes.

The *Aboriginal Cultural Heritage Act 2003* and the *Torres Strait Islander Cultural Heritage Act 2003* provide for recognition, blanket protection and conservation of Aboriginal and Torres Strait Islander cultural heritage. The *Environmental Protection Act 1994* imposes a general environmental duty (s319) to avoid causing environmental harm and the *Vegetation Management Act 1999* applies a regulatory framework to manage clearing. It is important that the water management framework stays focussed on water-specific considerations and does not duplicate other processes if sustainable agricultural development is to progress.

Expecting a broadacre agriculture water project proponent to deliver traineeships, youth scholarships, contributions to community amenity funds or sponsorship of local businesses (s17) and a natural resource department to subsequently assess those benefits, in the context of that specific community and its needs, is unreasonable and should be removed in the final draft. Assessing cumulative impacts concerning other projects is likely to result in further costs to project proponents and if pursued should be covered or heavily supported by the state government.

Recommendation: Requirements on applicants for general and CYPHA reserve water should be streamlined as much as possible, not duplicate other regulatory frameworks and be consistently applied.

Restrictions on CYPHA water use

Unlike general reserve releases, the draft WMP (s31) limits CYPHA licenses through not allowing permanent transfers, and limits assignment opportunities to other users including preventing use in areas declared to be high conservation value, simply by a decision of the Minister under the VMA (s62(3)) and limiting the time period of the assignment (s62(4)). Such conditions seem designed to constrain CYPHA water use for the greatest economic benefit of Aboriginal peoples and Torres Strait Islanders and it is not clearly explained why these additional conditions are applied. If not clearly justified they should be removed.

Recommendation: Restrictions on the use of CYPHA reserves that unnecessarily constrain their use should be removed.

Licensing and dealing

AgForce does not support mandating water use efficiency outcomes as part of conditioning of entitlements, preferring instead efficiency outcomes to be promoted at initial allocation and through the application of effective and efficient trading or facilitating license relocation.

Water use management – surface water

The proposed plan includes management of overland flow (OLF) in all catchments with enhanced limits on new OLF storages. Outside of the Normanby catchment (addressed above), the draft plan proposes to allow take of OLF water if it is for S&D purposes, or if works are existing and authorised or if the works are for other purposes (non-S&D use) and the capacity is less than 50 ML. This 50 ML limit is lower than the 250 ML used in the Mitchell and Gulf water plans, has more in common with settings in heavily utilised catchments such as the Fitzroy, and requires more justification if included in the final Plan.

In relation to granting a license to continue to take water from OLF into existing works (s66 of draft WMP) to replace an authorisation provided (under s65), if harvest volumes are to be reduced when considering the cumulative impact of taking OLF on surface water flows in the catchment then reasonable compensation or other consideration for past investments in works construction and use should be provided.

Small scale and mosaic irrigation, such as to produce fodder for drought -proofing properties and reduce freight costs, can be developed in such a way as to avoid environmental impacts. CSIRO has also done work on this approach and that should be reviewed and incorporated⁹.

Water use management – trading

AgForce supports the development of trading of water allocations to allow efficient reallocation by the market. Trading should be consistent with the principles of the Water Act that promotes trading, as unrestricted as possible, where impacts on other users and the environment are avoided and no additional water is taken above that sustainable and identified within the water plan.

The Cook and Lakeland UMA are to include capacity for permanent and seasonal relocation of underground entitlements. Water license trading (permanent and seasonal assignment) zones are to be established in priority areas of the Normanby and Jeannie catchments, with reasonably standard conditions/rules of trade as applies elsewhere in the state.

The Plan introduces the flexibility to relocate ('trade') licences – 25 surface licenses in the Endeavour are to be converted to tradable allocations as sufficient data is available there to do so with confidence. This should assist in allowing water to move to its 'highest value' uses.

We would encourage the government to continue to invest in developing information that allows further trading opportunities to develop.

Water for prescribed activities

AgForce supports up to 5 ML per annum to be taken for prescribed activities, including for vehicle washdown, filling stock dips and spray races, and repairing riparian areas.

⁹ Grice AC, Watson I and Stone P (2013) 'Mosaic Irrigation for the Northern Australian Beef Industry. An assessment of sustainability and potential. Technical Report.' A report prepared for the Office of Northern Australia. CSIRO, Brisbane. 255pp. (Refer to page 59) <https://www.csiro.au/en/Research/Major-initiatives/Northern-Australia/Achievements/Mosaic-irrigation>

Implementation and amendment – monitoring and reporting

AgForce supports evidence-based decision making but this needs to be cost-effective and also proportionate to the risks being managed, rather than taking a 'one size fits all' approach. If public good outcomes are included within the water plan, then it is appropriate that it should continue to be funded by government.

AgForce supports monitoring efforts that will assist in the better management of water resources on the Cape to ensure sustainability and economic activity occurs. We support keeping publicly available information and data about ecological assets (s73 of WMP) but do not support the publication of volumes of water taken, future consumptive demands for water or water use efficiency, of individual entitlements (s74). This information should be made available to the Department for water management purposes only, but not be made publicly available, in order to protect the privacy and commercial interests of the people involved. This does not occur in other catchments across the state and should not occur in the Cape either.

Recommendation: Information about volumes of water taken, future consumptive demands for water or water use efficiency of individual entitlements should not be published, to protect the privacy and commercial interests of the people involved.

In relation to Plan Assessment, s75(2a) refers to accounting for water use authorised to occur without entitlement. As stated earlier AgForce does not support measuring or metering S&D takes as they are a small amount of the total runoff and can be reasonably accurately estimated.

AgForce supports the proposed 5-yearly reporting cycle.

Subsequent to the final Plan's release, it is important that the water users of the Cape are effectively informed about water planning methods and what their rights and obligations are under the new framework, as flagged on page 10 of the Statement of Intent.

Recommendation: The Department should continue to proactively inform water users on the Cape about water planning methods and what their rights and obligations are under the new framework.

Conclusion

Any questions in relation to this submission should be referred to Dr Dale Miller, General Manager - Policy, via telephone on 07 3236 3100 or via email (millerd@agforceqld.org.au).

Yours faithfully



Grant Maudsley
AgForce Queensland Farmers