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GM/DM/0510

5 October 2018

Mr Christopher Biesaga  
Great Artesian Basin Secretariat  
Water Division  
Department of Agriculture and Water Resources  
GPO Box 858  
Canberra ACT 2601

By Post & By Email: [gabsecretariat@agriculture.gov.au](mailto:gabsecretariat@agriculture.gov.au)

Dear Mr Biesaga

### **Re: Feedback on the draft Great Artesian Basin Strategic Management 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 Great Artesian Basin (GAB) Strategic Management Plan 2018 (the draft Plan). Underground water resources are critically important to the survival of many agricultural businesses and livelihoods, including of our members, and so the security and certainty of access to these resources is paramount.

### **Vision and supporting principles**

The draft Plan outlines a vision whereby the GAB is *'managed judiciously by governments, communities and industries working together to ensure optimal use of the water for present and future generations in a manner that upholds the values of the Basin and maintains water-dependent ecosystems'*.

AgForce supports this vision in principle and a **GAB management framework that ensures entitlement holder confidence in the reliability of water supplies, particularly for stock and domestic uses, and that does not represent a significant risk to the long-term sustainability of those water resources and associated ecosystems.**

AgForce endorses the following policy positions relating to the management and use of GAB water:

1. Access to available water for stock and domestic (S&D) purposes is a basic landholder right with intrinsic volume limits related to land capability and should be prioritised over other competing consumptive uses

2. Groundwater planning and management should ensure the security, reliability and quality of the supplies of primary producers, including at least maintaining associated water pressures
3. Support making further groundwater available for economic development in a responsible and sustainable way where this does not reduce the certainty, security and reliability of current entitlements, or increases the risk of adverse environmental impacts.
4. Support a partnership approach to sustainability efforts to complete remaining bore capping and piping work, including the use of positive incentives to participation for landholders
5. To complete the capping and piping of all required bores, if effective landholder incentives are provided during a significant transition period (e.g. not less than 10 years), then and only then would AgForce support an end to further public Sustainability Initiative co-funding and the greater use of regulation targeted at ensuring controlled systems are used
6. As a basic right with intrinsic limits, water used for stock and domestic purposes should not be tradeable, metered (unless voluntarily), nor subject to water pricing regimes.
7. Monitoring needs to be cost-effective and risk-proportionate, targeting those areas of greatest risk of over-allocation or other unsustainable use.
8. Maintenance, renewal and replacement of groundwater infrastructure is the sole responsibility of the bore owner(s).

The draft Plan proposes seven guiding principles for managing the GAB that achieve triple bottom line outcomes. These principles cover:

1. coordinated governance
2. a healthy resource
3. Aboriginal and Torres Strait Islander values, cultural heritage and other community values
4. secure and managed access
5. judicious use of groundwater
6. information, knowledge and understanding
7. information management, communications and education.

This submission will provide our comments using these guiding principles as headings. A summary of our key recommendations are as follows:

**Recommendations**

To continue good faith involvement, the final Plan should include clearly defined pathways for agricultural and other stakeholders to have their say on Plan implementation and include a public feedback mechanism on how governments have responded to that input.
It is important that Basin governments do not duplicate existing statutory or voluntary land use and management frameworks, such as BMP programs, and that 'regulatory creep' aimed at additional land use regulation is not embedded in the final Plan.
In supporting the aspirations of Aboriginal and Torres Strait Islander peoples, access to water for economic purposes should occur within the existing general (or state) reserve/entitlement system, ideally applying to all consumptive uses, with transparent and equitable rules applying.
AgForce supports making further groundwater available for economic development where this does not reduce the certainty, security and reliability of current entitlements, or increases the risk of adverse environmental impacts. Water user and public confidence in the security of water

entitlements is most assured when third party impacts are firstly avoided, minimised and then mitigated and this hierarchy of protections should be adopted in the final Plan.
As a basic right with intrinsic limits and due to doubtful cost/benefit outcomes, water used for stock and domestic purposes should not be metered (unless voluntarily), with modelling adequate for the purposes of the Plan already available to deliver estimates of S&D use.
AgForce has been an active advocate for the funding partnership approach to sustainability efforts to complete remaining bore capping and piping work, including the use of positive incentives to participation for landholders, and these initiative programs should be strongly supported in the final Plan.
AgForce does not support the use of regulation to mandate use of more water efficient technology, given the capital investment decisions on water infrastructure often have a long-term horizon and the desire to retain confidence in entitlement security.
A clear understanding of the current and future bore maintenance task and development of a strategy to deal with this challenge, including bore owner support if required, is indicated as a priority under the final Plan.
AgForce supports evidence-based risk management approaches and an adaptive management approach that presents no significant risk to the integrity of the GAB, either quantity or quality of the resource, when accommodating new uses or industries such as unconventional gas.
Scientific information on the GAB must be reported in an accessible and consolidated way, including for those without a scientific background, with indications of its reliability provided.

### **Coordinated Governance**

This non-statutory Plan has a life of 15 years to 2033 and will be reviewed every 5 years to check progress. Based on past experience, these timeframes seem appropriate. The draft Plan indicates that it will draw on the knowledge and expertise of water users and others in providing input and evidence to help ensure inclusive, effective and coordinated responses to risks and opportunities.

AgForce would like to strongly emphasise the importance of involving pastoral and agricultural interests in Plan implementation, however the draft Plan does not clearly specify how this involvement will occur. It also does not provide for robust feedback mechanisms to those water users to indicate how the Basin governments have adopted their perspectives in making management decisions. This mechanism could include a statutory requirement for a regular Basin Minister's report outlining agreed decisions and how stakeholder feedback was obtained and considered in arriving at those decisions.

It is vitally important for ongoing good faith involvement by water users, and for confidence in decisions about GAB water use and a commitment to a shared approach, for there to be certainty about governance arrangements. The current GAB Co-ordinating Committee has been a useful mechanism for the collection of stakeholder views, but its future is uncertain. This needs to be addressed.

### **A Healthy Resource**

The August 2016 Frontier Economics report estimated that consumption of GAB water contributes \$12.8 Billion annually to the Australian economy, including \$3 Billion from livestock within Queensland. The draft Plan notes that in Queensland the annual take of water in 2016 was estimated at approximately 315,000 ML/year, with stock and domestic (S&D) water extraction estimated to comprise almost 50 pc of GAB water use (156,000 ML/year), with about half flowing uncontrolled from bores, although this is a declining proportion.

AgForce supports evidence-based water planning and the use of science to identify extraction levels that are sustainable and associated management measures. AgForce recognises that the state of aquifers and GDEs has changed because the GAB is a working Basin and that the system cannot be returned to a former completely 'natural condition'.

The outcomes in Table 2 of the draft Plan indicate water resource matters should be considered as part of land use planning and be linked to regional NRM plans and that land use and physical impacts be considered when undertaking GAB water management. It is important that Basin governments do not duplicate existing statutory or voluntary land management frameworks, such as BMP programs, and that 'regulatory creep' is not embedded in the final Plan. The disadvantages of this approach were evidenced in the repealed Wild Rivers Act in Queensland and that regulation effectively worked against effective land management outcomes by landholders.

### **Aboriginal and Torres Strait Islander Values, cultural heritage and other community values**

AgForce supports ensuring GAB water is available to support culturally significant groundwater dependent ecosystems (GDEs) and that Aboriginal and Torres Strait Islander people have an effective voice in coordinated governance arrangements, as for agricultural users, and can provide their cultural knowledge in support of decision-making.

AgForce sees benefits in supporting the economic aspirations of Aboriginal and Torres Strait Islander peoples, including primary producers who form part of our membership, however access to water for economic purposes should occur within the existing general (or state) reserve/entitlement system that applies to consumptive use. If required, the government can support economic participation by providing funds to enable traditional owners to take part in the marketplace for water or to access unallocated reserves. As far as practicable water for consumptive uses (agricultural, resource, indigenous, electricity generation, etc.) should be managed under a single consistent system with rules that are transparent and equitable for all. Such purposes are separate from consideration of the provision of water to traditional owners for cultural purposes.

### **Secure and Managed Access**

AgForce supports clear, secure statutory rights for authorised users, specifically including S&D and agricultural users, and its role in increasing the certainty of this critical water supply for all users over the long term.

The draft Plan notes that a challenge for the Plan period is changing demand for groundwater to include intensive agriculture, resource extraction uses as well as geothermal power production, with potential for new third party impacts from water pressure changes.

AgForce supports making further groundwater available for economic development in a responsible and sustainable way where this does not reduce the certainty, security and reliability of current entitlements, or increases the risk of adverse environmental impacts. Access to available water for stock and domestic (S&D) purposes is a basic landholder right with intrinsic volume limits related to land capability and should be prioritised over other competing consumptive uses.

The draft Plan indicates that compliance programs need to encourage judicious use through education, knowledge and information and that these need to be accompanied by penalties imposed in accordance with compliance frameworks. AgForce does not support illegal take and use of water. We prefer voluntary mechanisms and incentives to minimise water wastage but acknowledge the need for proportionate and well-understood penalties if required. For these to be effective, water users must have a real say in GAB water management arrangements, rather than having them arbitrarily imposed by government. A risk-based approach to compliance and education is supported, including for resource sector use.

Water user and public confidence in the security of water entitlements is most assured when third party impacts are firstly avoided, minimised and then mitigated. The wording in Table 4 should clearly reflect this hierarchy rather than just refer to impact management.

Table 4 references '*All authorised groundwater extraction is accounted for*'. All water taken from the GAB, except for S&D purposes should be monitored and metered. As a basic right with intrinsic limits, water used for stock and domestic purposes should not be tradeable, metered (unless voluntarily), nor subject to water pricing regimes. AgForce does not support requiring S&D licenses to include a volumetric limit, as these takes are limited by the carrying capacity of the land to which they are attached. Queensland's Office of Groundwater Impact Assessment (OGIA) has developed a model to estimate S&D water use and these types of approach are preferable to requiring costly metering of this low risk and fundamental use which doesn't deliver significant benefit.

### **Judicious use**

AgForce supports the judicious use of GAB water resources and the maintenance and restoration of local to sub-regional groundwater pressures. Past studies have indicated that the private benefit to cost for graziers in capping and piping is marginal and that the public benefits outweigh the public cost of the GABSI program<sup>1</sup>. We have been an active advocate for the partnership approach to sustainability efforts to complete remaining bore capping and piping work, including the use of positive incentives to participation for landholders. Recent funding announcements are welcomed, and these initiative programs should be strongly supported in the final Plan.

In relation to improved efficiency of use, Queensland government survey data indicates that the majority of bore owners with outstanding works have already capped and piped systems under their control and there is no reason to believe that they will not finish remaining work as soon as it is financially practical, particularly given the impacts of the current, severe drought.

Any moves to a regulatory requirement for controlled systems should include an extended transition period, consideration of prevailing economic conditions and the availability and effectiveness of incentives. The recent Queensland *GAB and other Regional Aquifers Water Plan 2017* takes a reasonable approach to facilitating this transition and our submission to that process (attached) should be reviewed. AgForce would not support any loss of consideration of the needs of bore owners in aligning statutory requirements across the different Basin jurisdictions.

AgForce does not support the use of regulation to mandate use of more water efficient technology, given the capital investment decisions on water infrastructure often have a long-term horizon and the desire to retain confidence in entitlement security. There is support for incentivising WUE and productivity at initial allocation of unallocated reserves and for education, information and incentives to be provided.

Maintenance, renewal and replacement of groundwater infrastructure is the sole responsibility of the bore owner(s) and this represents a significant challenge for pastoral and agricultural users over the life of the Plan. The draft Plan indicates that on-farm investment has been significant with a total of 50,475 bores in the Basin, mostly less than 200 metres deep, but with more than a thousand bores deeper than 1,200 metres. With over \$3 billion of pastoral GAB water delivery infrastructure, maintenance costs are a significant risk as bores reach the end of their useful life and must be replaced. Drought impacts on financial reserves will also challenge bore owners, potentially across most of the life of the Plan. A clear understanding of the task and development

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<sup>1</sup> See for example Centre for International Economics, 2003, Farm costs, benefits and risks from bore capping and piping in the GAB, Report prepared for Agriculture, Fisheries and Forestry — Australia; Pegler et al., 2002, Rangel. J. 24(2) pp 185-206; Rolfe, 2010, Water Resour. Res. Vol 46

of a strategy to deal with this challenge is strongly indicated for Basin governments and stakeholders to adopt as a priority.

AgForce supports the trading of water where scientific understanding of the system, physical connection and third party and environmental impact avoidance and management allows.

### **Information, knowledge and understanding for good management**

AgForce supports evidence-based risk management approaches and, given the importance of the GAB to broadacre industry, a precautionary adaptive management approach that presents no significant risk to the integrity of the GAB, either quantity or quality of the resource. This is particularly relevant to mining and unconventional gas development. Adequate baselines must be developed before new development, particularly if untested, occurs.

Monitoring needs to be cost-effective and risk-proportionate, targeting those areas of greatest risk of over-allocation or other unsustainable use.

### **Information management, communication and education**

Clear communication of the scientific understanding of the Basin and its use is very important to water user confidence in risk management steps and what development will be broadly accepted. Mis-information should be pushed-back on and deficiencies in required understanding identified and further work invested in. Information must be available and reported in an accessible way to interested parties, including those without a scientific background, with indications of its reliability. An information open access and consolidated or centralised approach would be supported.

Providing a basin-wide resource condition report updated 12 months prior to each five-year review of the Plan and including indicators of the current state of Basin management, and identification of emerging trends, risks, challenges and opportunities would be useful to inform decision-making.

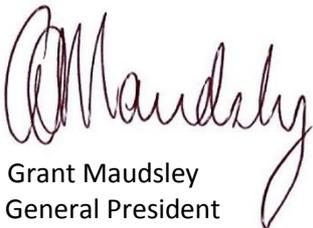
The draft Plan (p21) indicates that *'Using information and dialogue appropriately during policy development, planning and implementation helps to build trust, transparency, accountability and acceptance between managers, industry and water users. Such relationships are a key to establishing the willing adoption of management measures and minimising the need for costly compliance enforcement and confrontation.'*

This goes to reinforcing the need for clear and inclusive governance arrangements that enable real participation by pastoral and agricultural water users and other stakeholders.

### **Conclusion**

For any enquiries regarding the contents of this submission please contact Dr Dale Miller, General Manager – Policy, on 07 3236 3100 or via email ([millerd@agforceqld.org.au](mailto:millerd@agforceqld.org.au)).

Yours sincerely,



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