

Condamine Catchment Management Association

Response to the

Draft Water Allocation and Management Plan **(Condamine Balonne Basin)**



Part 1

CCMA Positions on the Draft WAMP

The Plan, the Process and the Preferred Scenario

The Moratorium and Overland Flow

Metering and Monitoring

Tradability

Environmental Considerations

Social and Economic Study

Compensation

Inactive Licences (sleepers)

Scientific and Technical Data

PART 1 – CCMA Positions on the DRAFT WAMP

Following extensive community consultation and discussion, the Condamine Catchment Management Association (CCMA) would like to submit the following comments pertaining to issues contained within the DRAFT Water Allocation and Management Plan for the Condamine Balonne (WAMP).

This submission seeks to address the issues primarily of the Condamine River. It is acknowledged that different considerations may apply in the Balonne reach.

In this submission the CCMA has sought only to provide for sustainable river health in our Condamine Catchment and to pass on a reasonable share of flows to downstream users.

When considering these comments it must be noted that there were a number of dissenting views within the CCMA and the positions below reflect the preferred position of the CCMA.

1. The Plan, the Process and the Preferred Scenario

The CCMA applaud the government for initiating this step towards the sustainable management of our water resources.

On the basis that the modelled mean flows at Chinchilla (after allowing for utilisation of installed infrastructure and current practices) are of the order of 68%, **the CCMA strongly supports Scenario A as updated and validated to mid 2000.**

There is strong support within the community for a second draft to be circulated prior to a whole of government decision being made to ensure an opportunity to respond to the revised proposed plan and it's implementation.

In addition, **CCMA suggests that the catchment management association, as the key environmental broker for the catchment, should be incorporated more effectively into the consultation process.**

2. The Moratorium and Overland Flow

The CCMA unanimously supports the moratorium currently in place in the entire Condamine-Balonne WAMP region and believe it should remain in place until properly developed Resource Operational Plans (ROPs) are in place, tested, verified and supported by the community. We request that the Department of Natural Resources, in consultation with the community, progress this matter with some urgency.

3. Metering and Monitoring

The CCMA supports the need to meter as a tool to manage the resource. Stock (other than intensive enterprises) and domestic water use by virtue of their minor impact should not require metering. Any metering system needs to be designed to cater for the complexities involved in the variety of water use systems in place within the catchment.

Riverine health needs to be monitored to see if the WAMP process is actually achieving it's intended purpose. It is essential that Government funds be allocated to monitoring as soon as the WAMP is finalised to ensure that benchmarks are set and targets can be reviewed at a future date.

Furthermore, the CCMA believe that boundaries must be set to ensure that the local environment is not adversely affected by water trading. There should be a process to determine how any new water could be accessed.

4. Tradability

It is imperative that the Queensland Government initiate work on a process to establish trading rules so trading can be operational and be available as soon as practicable after the moratorium.

5. Environmental Considerations

The CCMA recognise the importance of the Narran Lakes and the environmental value of these Ramsar listed wetlands. However, it is our view that water extraction in the Condamine Catchment is not unacceptable for this important wetland. **Far more important environmental issues for the Condamine Catchment include the restoration and maintenance of the riverine corridor and riparian vegetation.**

The CCMA supports further work in maintaining riverine requirements in each reach of the river.

6. Social and Economic Study

When initiating any WAMP process, social and economic analysis should commence at the same time as any physical modelling. Data on social and economic implications of the WAMP needs to be available for the community to consider. Any social and economic data needs to include intergenerational considerations as well as details on the cost of mitigation as opposed to rehabilitation. In addition, information must be provided to indicate environmental loss in monetary and ecological terms.

The CCMA notes that the social and economic data is not yet available and reserves the right to reply to this document once it is finalised.

7. Compensation

Compensation must be paid by government for any reduction of rights granted by any government. The option for buying-back or 'clawing back' ground and surface water allocations with compensation has been listed as a mechanism for improved governance for land and water management in the National Action Plan for Salinity and Water Quality, announced by the Commonwealth Government in October 2000.

8. Inactive licences (sleepers)

Sleepers should be accepted as a right in the Plan, with the reservation that, they should also be the first category affected if there is to be a clawback. If data becomes available indicating an increase in the amount of water available, the sleeper component must have the option of reallocation.

9. Scientific and technical data

It is important to convince people of the need for change by utilising accurate data and scientific knowledge. The CCMA strongly suggest that a public scientific forum be held to assist the community in determining their views.

The CCMA reserve their right to further comment subsequent to such a forum being held.

Part 2

CCMA Water Forum

Summary of key points discussed

The Plan and the Process

The Moratorium and Overland Flow

Metering and Monitoring

Tradability

Environmental Considerations

Social and Economic Study

Compensation

Water Use Efficiency

PART 2 - CCMA Water Forum

To assist the CCMA in formulating a response to the DRAFT WAMP, the Committee hosted a Water Forum, inviting written submissions from stakeholders within the catchment. In all, 13 submissions were received representing numerous catchment interests. Those who made a formal submission are listed below.

- Agforce
- Australian Lot Feeder's Association
- Brigalow Jimbour Floodplains Group
- Condamine Uplands Protection Society
- Condamine River Basin Irrigators Association
- Chinchilla & District Water Users' Association Inc and Chinchilla Shire Council
- Darling Downs Cotton Growers Inc.
- landowner, Killarney
- landowners, The Head
- Toowoomba & Region Environment Council
- Toowoomba City Council (*verbal only*)
- Upper Condamine Unregulated Flow Users
- World Wide Fund for Nature

The **Water Forum** identified a number of issues with the Draft WAMP, too numerous to explore in great detail in a single day. A number of key issues were drawn out and accepted by the group as the priority issues requiring further discussion. These issues have been refined to those listed below (in no particular order).

1. The Plan and the Process
2. The Moratorium and Overland Flow
3. Metering and Monitoring
4. Tradability
5. Environmental Considerations
6. Social and Economic Needs
7. Compensation
8. Water use Efficiency

Following is a summary of the points raised during the discussion on the day representing different points of view. A series of suggested actions are identified in bold and evolved from group discussion on each of the key points raised within the issues identified.

1. The Plan and the Process

Need for a Plan

There was agreement by those in attendance that there is a need for a water allocation and management planning process to occur. It was accepted that one of the major constraints on the current process was the inadequacy and inaccuracy of the data on which the model was based. Industry acknowledged the difficulty but regret the time lag.

Process to develop the Plan

It is important for the government to acknowledge the amount of voluntary community effort which has contributed to the process to date. The Community Reference Panel (CRP), used as a tool to assist in the consultation process was largely ineffectual for a number of reasons. This included the size of the panel and the order of action they were asked to participate in. The CRP lacked any preliminary indication of what the Draft Plan might look like to enable them to make meaningful input. If this was done, many contentious issues might have been avoided. The modelling data was unavailable and the role of the CRP became increasingly

unclear. Furthermore, advice provided by the CRP was then apparently 'disregarded' by the government in their decision making process about the content of the draft WAMP resulting in many of the community feeling 'rejected' by a government agenda. Time had been wasted.

Following the extensive time taken and the range of community input there are still various levels of disagreement with the DRAFT product, particularly in that it does not reflect the input from the community reference panel.

There was some support for a soft-stepped planning situation which could have worked in the timeframe proposed. If this were the case, the issue of inaccurate data would not have been of such a great importance as a planning process could have been underway and the data brought into the process when it was available or it could have been verified during the planning processes.

Suggested Action: When conducting a similar process it may be useful to compile a focus group, with a brief to prepare the draft plan prior to distribution. The makeup of such a group needs to be focussed on the environment and water. The focus group should be made up of five to ten people: water users, people with meters and DNR hydrologists and a TAP.

Suggested Action: Catchment management associations, as the key environmental broker for the catchment, should be incorporated more effectively into the consultation process as they are an ideal vehicle to drive community consultation.

The data

There was strong support for the inclusion of more ecological information in the plan to ensure that everyone is aware of all the issues the plan is trying to address. The lack of ecological indicators in the document has been identified as a major gap. They should be documented and circulated to assist people in their consideration of the document.

Inadequate, incorrect data was seen as an issue of high importance although it was acknowledged that DNR is working towards addressing this issue. An enormous amount of community energy and expertise has been spent on assisting DNR to revise the model which should be recognised.

Suggested Action: That confidence in the data is a pre-requisite prior to distribution.

Working groups established subsequent to the release of the draft WAMP

The establishment of working parties for specific sections within the Condamine Balonne were seen to be eliminating people from the consultation process. The revised data has not been widely circulated.

Suggested Action: Although there has been great effort to work with the community to discuss the content of the DRAFT WAMP, more emphasis should be placed on getting the document right before it is released.

General comments:

The length of time it has taken to go through the process has been extremely drawn out creating doubt and uncertainty within the community. This has affected both property purchasing/selling and property development opportunities.

It would have been of great benefit to have better modelling data prior to the WAMP process being publicly initiated. This would have resulted in a shorter period of community involvement.

There is strong support for the community to see and comment on a second draft before a government decision is made. This will enable the wider community to consider the results

following data verification and to consider the socio-economic implications of taking various degrees of action.

Suggested Action: There is strong support within the community for a second draft to be circulated prior to a government decision being made.

2. The Moratorium and Overland Flow

From the time the plan began, a moratorium should have been implemented so there was a level playing field until the plan was developed. One of the major issues is the length of time people have available to act on their licences and install works before they should be affected by the moratorium.

Suggested Action: There was unanimous support for the implementation of a moratorium until the WAMP planning process is finalised.

Exemptions

There should have been no exemptions under the moratorium such as the North Toolburra Weir. To ensure acceptance of the process it is critical that the same rules apply for all potential stakeholders. This includes government agencies. In particular, reference was made to the exemption of the Department of Works and State Development from the Water Act and subsequently the WAMP. It is inappropriate to establish one set of rules and then apply another set when the government wishes to achieve other objectives. By allowing these exemptions, the government is effectively undermining other stakeholder entitlements and confidence in the process.

Suggested Action: Any moratorium must affect everyone equally when it is implemented.

Discussion was also generated relating to when the moratorium should have been announced and the length of time the moratorium needed to continue.

Overland Flow

Within the Condamine catchment is an accepted view that overland flow is taxing a large proportion of the catchment water resources. This will increase without the constraints imposed by the moratorium or similar. While there was a strong view that current installed infrastructure should be supported given the development costs etc, nevertheless these structures must be monitored to comply with any catchment wide water management regime and reviewed periodically in that light.

Other comments:

- We will keep what we've got.
- You can't get any more because there is no more.
- First in gets the first amount.
- Every landholder has a right to a percentage of the run-off that falls on their land.

3. Metering and Monitoring

Usefulness of metering

There was general agreement regarding the need to meter and there was a range of views as to the extent, the cost, the usefulness and the purpose as outlined by the comments below.

Purpose of metering

The value of metering is the data collected although this must be linked to long-term monitoring. The involvement of landholders in this process would enable them to utilise the results for personal business management purposes such as water use efficiency.

Metering issues

Query as to how gravity fed systems are to be metered. A metering system would need to ensure that water use isn't metered more than once.

Costs of Metering

There was general agreement that if the government pays for the meter and pays for the user training then the user would be obliged to provide data to assist in monitoring.

Suggested Action: It is important to utilise metering as a tool to monitor the use of the resource and to implement and enforce the plan.

4. Tradability

Equity

A key issue of discussion was the definition of a 'water user' and what rights attach. The range of 'water users' discussed varied from those that had licences and had invested to fully develop that licence to those with no licence and where no investment had been made for development.

Suggested Action: Clearly stipulate a 'hierarchy of rights' system for water users showing clear delineation from an activated developed license to an inactive and undeveloped licence, through to unlicensed use.

Licence activation

There was a suggestion of a 2 year period for the installation of sleeper licences. Concern was expressed however, that this could lead to exactly the opposite outcome in terms of the desired WAMP goals.

Other Comments:

- Sleeper and dozer licences ought to have a right in the equation
- Most people in the Upper Condamine are dozers.
- If, sleepers were allowed, would they be a big dozer or little dozer. The dozer capacity is currently dependent on storage capacity. If a sleeper is to become a dozer, there needs to be a relationship with the size of a storage (note sleeper has a different definition to a dozer – large access licences should be treated differently to small licence). It was agreed that this issue is extremely complex.
- A sleeper licence that has not been activated within the two year period should not be traded outside that sub-catchment. It should remain in that sub-catchment to be reallocated, to improve security or to be used as environmental flows.
- The difficulty to manage and cut back when we don't know what is taken.
- Each landowner should have a right to capture/use a certain percentage of the runoff on their property.
- The comment was made that s.100 of the Constitution allows residents of the state the right to the 'reasonable' use of the waters of rivers for conservation and irrigation.
- Existing infrastructure should have priority over everyone else.

Suggested Action: Note that there were clear points of disagreement around the table on this issue of moving licences.

5. Environmental Considerations

Narran Lakes

All present at the Forum acknowledged the importance of the Ramsar listed wetland, Narran Lakes and its need for a sufficient flow of water. However, there was a strong view that the Upper Condamine does not have a large affect on water reaching Narran Lakes. It was felt that this region could gain greater benefit if it focussed on addressing riparian vegetation and water quality issues.

General

Following the release of the Prime Minister's Action Plan for Salinity and Water Quality, it was acknowledged that the issue of water allocation and use needed to be integrated with broader issues such as riparian vegetation and salinity. There was some concern related to our limited knowledge of salinity risk in this region and the need to implement pre-emptive measures that were flexible to manage as more information became available.

Suggested Action: There was strong support for the need to provide a benchmark against which further monitoring and outcomes could be compared. Financial incentives should be incorporated to assist in documenting the range of practices currently being adopted and the outcomes being achieved.

Setting targets

There needs to be credible information available to stop the 'goal posts from changing' during the planning and implementation process. The current targets as described in the WAMP are extremely unclear and are not understood within the community.

Suggested Action: It is important that targets to achieve the right ecological outcomes are clearly stated for industry and community use.

Need for monitoring

There is a need for long-term commitment to continue ecological monitoring during the WAMP to ensure that all needs are being met and targets are being achieved – or if not, why not. There needs to be a clear definition of what we should be achieving so we can monitor and add restrictions, or be more lenient if appropriate.

Suggested Action: Provide financial support that can be delivered via local, organisations to implement environmental services eg riverine rehabilitation.

6. Social and Economic Study

This was seen as a critical issue and essential for inclusion prior to a Draft WAMP being released. The community must be able to comment on this data to ensure its accuracy and validity. At present, the community has only been able to comment on the methodology that is to be used without being able to see what sort of data that methodology will result in. For this data to be accepted it must be able to be scrutinised by the community at large.

Suggested Action: The community need to be able to comment on social and economic data in a process similar to that when they commented on the TAP report.

There is a perception within the community that this element of resource management has been given a lower priority as only a draft study has been released to date with more information currently being compiled.

The fact that the socio-economic report is based on the current draft document, which is full of flawed data, gives greater reason as to why this matter needs to be addressed with some urgency.

Suggested Action: It is important that social and economic data is linked not just to impacts on regions due to increasing/decreasing water diversion but also the costs of mitigating any environmental damage that would need to be reversed in the future. In addition, it is important that this data include an intergenerational impact, not just an immediate impact.

7. Compensation

Compensation Rights

Suggested Action: The government established the current system of allocation and as such they must acknowledge that they have a responsibility to compensate if there is any reduction in entitlement.

How could the issue of compensation be dealt with?

Suggested Action: There was strong support for the government to consider:

- ***Payment for services rendered/adjustment as opposed to using the word 'compensation'. This may include payments for licences surrendered which could then be utilised as part of an environmental contribution.***
- ***Buying licences back.***
- ***Spending dollars to encourage water use efficiency (received strong support).***
- ***Investigating the option of a water bank to ensure beneficial flows when required.***
- ***The possibility of different scenarios for different parts of the catchment which could result in different compensation for different areas and different types of licences. For example sleepers in a highly developed region are more environmentally sensitive than those in an area of low development.***

More specific comments relating to the issue of compensation are noted in Part 3 – individual submissions which have been attached as part of this response.

8. Water Use Efficiency

All present at the forum recognise government commitment to Water Use Efficiency measures, currently being delivered by government and industry.

Suggested Action: Where government makes investment to improve water use efficiency, then water can be returned to the environment. But if the user pays for the efficiency gain, the user should be able to keep the water.

More information needs to be made available on how evaporation, transpiration and groundwater recharge fit into the water use efficiency equation. Queries raised and issues to be addressed include the following:

- What are the values placed on transmission losses?
- How should the water be managed to minimise evaporation from dams?
- How are the losses factored into the equation when they also positively contribute to recharging groundwater, riverine use and other environmental receivers within the cycle?

Suggested Action: There was strong support for the allocation of additional funds for Research and Development in the catchment as a high priority.

There was some support for a percentage target reduction in water use due to water use efficiency measures to apply to all water users. There needs to be incentives provided to improve water use efficiency and these incentives should target both urban and rural communities. A benchmark must be set as a driver to encourage the adoption of water use efficient practices and people must be rewarded if achievements are being made.

Part 3

Individual Submissions received by CCMA as part of the Water Forum for the Condamine Catchment

Agforce
Australian Lot Feeder's Association
Brigalow Jimbour Floodplains Group
Condamine Uplands Protection Society
Condamine River Basin Irrigators Association
Chinchilla & District Water Users' Association Inc and Chinchilla Shire Council
Darling Downs Cotton Growers Inc.
Landowner, Killarney
Landowners, The Head
Toowoomba & Region Environment Council
Toowoomba City Council (*verbal only*)
Upper Condamine Unregulated Water Irrigators Association
World Wide Fund for Nature

Note: These submissions were provided to the CCMA on 23 October 2000. Subsequent events may have resulted in a differing position to that outlined in the attachments provided with this submission. Please refer to responses, submitted separately for consideration by the above mentioned groups/individuals (where provided).