



QUEENSLAND  
FARMERS'  
FEDERATION

# Consultation on the draft principles of a **National Water Agreement (discussion paper) (September, 2024).**

## **Prepared by:**

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## **Prepared for:**

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Department of Climate Change, Energy, the  
Environment and Water

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**The united voice of  
Queensland agriculture**

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## Our members

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- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- 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
- Lockyer Valley Water Users

# About the Queensland Farmers' Federation



## The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

## Submission

QFF welcomes the opportunity to provide comment on the Australian Government, Department of Climate Change, Energy, the Environment and Water; Consultation on the draft principles of a National Water Agreement (discussion paper) (September, 2024).

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

## Executive Summary

QFF recognises the multiple emerging water management needs since the National Water Initiative (NWI) was created in 2004 and the importance of efficient, transparent, and sustainable water resource planning to achieve water security. QFF also recognises the significant influence that the NWI has had on regional communities and irrigator industries in establishing a water market.

A new NWA represents significant policy reform that requires extensive, meaningful and diverse input through public consultation to ensure that national water resource management and planning is effective across Australia's diversity of needs and challenges for the coming decades. It is imperative that the development and consultation of a new NWA appropriately considers all aspects and needs of stakeholders and communities to ensure future stakeholder and community support.

In our submission to DCCEEW's Discussion Paper for a New National Water Agreement (March 2024), QFF does not support the proposal for a new national water agreement. QFF endorses the recommendations of the Productivity Commission's National Water Reform Interim report 2024, particularly that: "a renewed NWI should improve and expand on the existing agreement while retaining its foundations."<sup>1</sup>

QFF has considered DCCEEW's Consultation on the draft principles of a National Water Agreement (discussion paper), and QFF does not support the Objectives, Outcomes, Schedules, and desired Principles that are proposed.

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<sup>1</sup> Productivity Commission 2024, National Water Reform 2024, Interim Report, Canberra, April.



QFF supports the submission of the National Farmers' Federation (NFF) which highlights the significant issues and shortcomings in all components of the proposal for a new NWA and the need for significant time, effort, and meaningful engagement with industry to fix and resolve the significant issues.

QFF supports the NFF position asking for a meaningful and genuine co-design and public consultation on the development of a new NWA, and the NFF view that this process to date has taken a top-down Department-led approach without equitable engagement terms. Consultation must be done in a collaborative, open and transparent forum, however this consultation process to date has been rushed and omits important and impactful detail, and the insufficient timeframes disable any chance to have meaningful discussion within and across sectors.

Further, the information contained in the discussion papers has been vague and high level, and the engagement process to date has not appeared to incorporate or involve key stakeholders.

QFF supports the NFF position that the Department adopt a consultation process similar to the Productivity Commission (PC), where several rounds of consultation on each phase of the development process is conducted. It is insufficient to hold one public consultation to seek feedback on a significant reform measure and ignore industry feedback before moving to Water Ministers for their consideration and agreement.

QFF also advocates for the Department to provide for a further public consultation opportunity to support the development of Phase 3 and proper consideration and consultation on the new issues that have emerged for industry and the new proposed Principles that amend and expand upon the original intent of the NWI, before moving to Water Ministers for agreement.

There are key issues in the current NWA proposed principles, including:

- Provisions for fit-for-purpose cost recovery
- Ensuring the economic viability of existing water users
- Reducing costs for water access entitlement holders
- Ensuring reliability to existing entitlements when releasing Unallocated Water and/or creating new entitlements
- The need for more detail about processes to ensure fair and transparent water pricing
- The involvement of special interest groups in the development of water management mechanisms should not occur and must be limited to advisory roles
- The need for a national and public discourse regarding sovereignty (and removing sovereignty from the NWA until such a discourse is nationally undertaken)
- Recognition of a river as a living entity
- Terminology such as “rebalancing” of water and all its implications

QFF notes that consultation on issues and principles without adequate detail and resolution of the above matters and other matters highlighted by NFF presents significant risk to future water management and support by industries and stakeholders.

## Conclusion

QFF refers to its submission to DCCEEW's Discussion Paper for a New National Water Agreement (March 2024) and concerns raised therein. Further QFF supports the submission of NFF in response to the DCCEEW Consultation on the draft principles of a National Water Agreement (discussion

paper), and in its current iteration QFF does not support the Objectives, Outcomes, Schedules, and desired Principles that are proposed.

If you have any queries about this submission, please contact Alicia Kennedy at [alicia@qff.org.au](mailto:alicia@qff.org.au).

Yours sincerely

Jo Sheppard

Chief Executive Officer





**This submission is provided by the Queensland Farmers' Federation**

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