

Pioneer Valley Water Co-operative Limited.

A co-operative formed under the *Cooperatives Act 1997*.
ABN: 55 322 373 770

PO Box 275
(Level A, 120 Wood Street)
Mackay QLD 4740

Ref: C10_019_20

18 November 2022

Department of Regional Development, Manufacturing and Water
Chief Executive
Water Planning and Science North Region
Attention: Pioneer Water Planning Coordinator
PO Box 63
Mackay QLD 4740

Attn: Ingrid Fomiatti Minnesma - A/Executive Director

Re: Preliminary public consultation notice – Proposed replacement of the Water Plan (Pioneer Valley) 2002 – s44 of the Water Act 2000 (October 2022).

Dear Ingrid,

Pioneer Valley Water Co-operative Limited (PVWater) is a small not-for-profit service provider, distributing water for irrigation purposes to water allocation holders in the Pioneer River Water Supply Scheme.

PVWater welcomes the opportunity to provide comment on the Water Legislation Amendment Bill 2022 (October 2022). We provide this submission without prejudice to any additional submission from our members or individual farmers.

Summary

PVWater notes that notice was given under section 44 of the Water Act 2000, that the Minister for Regional Development and Manufacturing and Minister for Water proposes to replace the Water Plan (Pioneer Valley) 2002 (the plan).

The existing Pioneer Valley Water Plan is due to expire on 19 December 2022. It is understood that the implementation of the plan has been effective in achieving many of the plan outcomes. However, to ensure the water plan can continue to advance the sustainable management of water resources, the Pioneer Valley Water Plan expiry date has been postponed until 30 September 2025.

We would like to highlight outcomes in the Pioneer Valley region, that would contribute to the long-term efficiency of water within the water plan area. Outcomes that have been identified are:

- (a) To ensure a reliable and secure supply of water from the plan area during the time this plan is in effect.

- (b) To protect the ability to obtain water under a water allocation.
- (c) To provide for the opportunity for additional surface water to be taken from the Sandy Creek catchment area to reduce reliance on groundwater in areas affected, or likely to be affected, by seawater intrusion.
- (d) To provide the opportunity for additional surface water to be taken from the Pioneer River for future water requirements.
- (e) To allow water to be used for the following:
 - (i) agriculture;
 - (ii) aquaculture;
 - (iii) industrial needs;
 - (iv) small scale uses;
 - (v) stock and domestic purposes;
 - (vi) tourism and recreational uses;
 - (vii) urban needs;
- (f) To provide for the continued use of all water entitlements and other authorisations to take or interfere with surface water.
- (g) To encourage the efficient use of water.
- (h) To allow cultural use by Aboriginal or Torres Strait Islander communities.
- (i) To provide water to support natural ecosystems including natural groundwater-dependent ecosystems.

We would like to highlight that PVWater, located in the Pioneer Valley Water Plan area, operates in a closed system. As such, allocated water not used in the Pioneer Valley for irrigation, is stored in weirs and dams or flows out to the sea. Due to the geographic location of the Pioneer Valley, there are no opportunities to trade water outside the Pioneer Valley.

The cost recovery model for the agricultural sector has not managed to be economically viable for water allocation holders in the Pioneer Valley. The continual water pricing increases have overseen the downfall of the regional water market, with water allocations now seen in many cases as a deterrent to investment in the local agricultural sector.

PVWater has also noted that at the establishment of the scheme in the early 1990's, irrigators took on an allocation which was then viewed as a potential asset, now many irrigators are viewing their allocations as a liability, which are difficult to sell or transfer and virtually impossible to surrender.

Future Consultation:

- With the release of the State Energy and Jobs Plan, future opportunities such as Hydrogen manufacturing should have access to trade available water, at the same rate as comparable irrigation rates, with the same terms and conditions.
- Non-urban metering policy should be restricted to the take of water from bores, and un-supplemented and supplemented water sources and should not apply within a channel distribution scheme or a pipeline scheme where the water in and the water out can be measured.

- Water meters, used for measuring the take covered by this policy, should be owned and maintained by the water entitlement holder and existing water meters should be ‘grandfathered’ to ensure that farmers are not disposing of working assets before the end of their useful life and incurring unnecessary costs one day early.
- The cost of compliance should not result in agricultural businesses becoming non-viable and both the Federal and State Government should be required to provide financial assistance to water entitlement holders to meet the metering requirements with no subsequent cost recovery exercise.

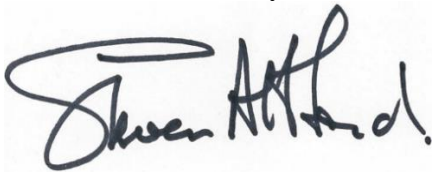
Conclusion

PVWater strongly supports the ability of farmers to trade water and understands from the department that any amendments to the Water Plan should offer greater flexibility for water trading to the agricultural community.

PVWater notes that as part of the Preliminary public consultation notice – Proposed replacement of the Water Plan (Pioneer Valley) 2002 – s44 of the Water Act 2000, it seeks to have detailed inclusion of any climate change modelling, and how the proposed pumped hydro in the Pioneer Valley water plan area will be integrated into the water plan.

It is vital that any proposed amendments that will form part of the future Water Management Protocol, Water Entitlement Notice, Resource Operations Licences, Distribution Operations Licences and Operations Manuals do not adversely impact the agricultural sector in general and irrigators (water allocation holders) in the Pioneer Valley specifically.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Steven Ford". The signature is written in a cursive, flowing style.

STEVEN FORD
GENERAL MANAGER.