

Lower Balonne Floodplain Association

Submission to the Senate Inquiry into Water Licenses 2009

The Lower Balonne Floodplain Association is making the following submission with particular reference to Part (A) the issuing of sustainability of water licenses under any draft resource plans of water resource plans.

The Lower Balonne Floodplain Association (LBFA) consists mainly of floodplain graziers on the Lower Balonne Floodplain which straddles the Queensland and NSW boarder.

The members of LBFA contend that the Condamine Balonne Water Resource Plan 2004 and the draft Lower Balonne Resource Operating Plan is unsustainable economically, environmentally, socially and culturally.

This statement is supported by the following points:

- 1) The NSW Government response to the Condamine Balonne WRP 2004.
- 2) Historical flow information provided by the Qld NRM website for flows in the Balonne River at St George from 1920 to 2006.
- 3) Over allocation in the Lower Balonne has led to 3 key areas of the WRP which require reform:
 - (i) Compensation flows
 - (ii) Water harvesting licences
 - (iii) Overland Flow entitlements

1. The NSW Government submitted a strong response to the QLD Government about the Condamine Balonne Water Resource Plan 2004.

The NSW Government noted the following issues which led to inequitable water allocation.

- (i) The planning process has failed to provide appropriate and equitable engagement of all affected communities, thereby resulting in a WRP strongly biased towards QLD irrigators.
- (ii) The draft WRP failed to fully address scientific uncertainty has selectively interpreted the Cullen et al "Review of Science".
- (iii) The draft WRP has failed to reverse, to any significant extent the drastic impacts that water resource development has had and will continue to have on the flow dependent ecological and economic assets in NSW.
- (iv) The draft WRP is completely unacceptable to NSW.

2. Historical flow information provided by the Qld NRM website for flows in the Balonne River at St George from 1920 to 2006.

The following historical flow information at St George is central to the modeling process for the WRP and ROP.

- (i) The total flow past St George from 1920 to 2006/7 was 103,603,024mL
- (ii) 24.72% (25,619,762mL) of total flow occurred in just 4 years since 1920.
- (iii) 52.71% (54,618,433mL) of total flow occurred in 15 years or 17.44% of time since 1920 (Average 689,928mL per year)
- (iv) 47.29% (48,984,591mL) of total flow occurred in 71 years or 82.56% of the time since 1920.
- (v) For the 20 worst flow years since 1920 or 23.25% of time since 1920, the total flow was 2,413,978 or 2.33% of total volume since 1920.
- (vi) Variability of Balonne at St George is 806% of mean since 1920.

The above figures demonstrate the variability of frequency, duration and volume of flows at St George. It highlights the fact that for 82.56% of time since 1920 to 2006, the average flow was 689,928mL and when compared to the private storage capacity in the Lower Balonne of 1,500,000mL it is hard to justify the QLD government issuing a plan that claims sustainability of water entitlements under the Condamine Balonne WRP.

3. Over allocation in the Lower Balonne has lead to 3 key areas of the WRP which requires reform.

- (i) Compensation flows need to be raised from 730mL per day to 1200mL per day during any flow event.
- (ii) Water harvesting entitlements need to be reduced to 30% of available flow in all daily flow windows capped at 60000mL
- (iii) Complete abolition of all Overland Flow entitlements.

There are 3 main ways water can be reallocated equitably in the Lower Balonne. Targeted buybacks of water using Commonwealth funding, water savings achieved using infrastructure and technology funding and by placing event size trigger points on extractions to achieve mandatory basin plan requirements .The Qld Government will need to ensure that future plans in the Condamine Balonne have a range of trigger points to allow extractions that reflect the variability of flows with event based management that accounts for frequency , duration and volume.

The Lower Balonne Floodplain Association is concerned that the federal Government does not currently understand unregulated rivers well enough to make decisions on major purchases of water. The Association acknowledges that the Federal Government should only buy water that has reasonable levels of frequency to increase the duration and penetration of flow down the river. Further, that the federal Government should not buy land and water as a package unless it is for the sole purpose of reducing measurable water entitlements.

Currently the QLD Condamine Balonne WRP and ROP are not aligned with the Commonwealth aspirations for water management. Any water that is purchased needs to have special legislation to shepherd it through the Lower Balonne and down the Basin.

Submitted on behalf of the Lower Balonne Floodplain Association by the Chair, Ed Fessey