



Department of Regional Development, Manufacturing and Water  
Chief Executive  
Water Planning South Region  
Attention: Senior Water Officer  
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Date: 26<sup>th</sup> May 2023

**Re: Submission to draft Mary Basin Water Plan, Water Management Protocol and Water Entitlement Notice.**

Dear Sir or Madam,

As Queensland's peak environment non-government organisation, the Queensland Conservation Council (QCC) welcomes the opportunity to provide the following comments regarding the draft Mary Basin Water Plan, Water Management Protocol and Water Entitlement Notice.

**1. Draft Mary Basin Water Plan (the draft plan)**

**1.1 Lack of strategy to deliver plan's purpose**

Under s2 (f) of the draft plan, a key purpose of the new water plan is to *"provide a framework for reversing, where practicable, the degradation of natural ecosystems caused by the taking of, or interference with, water to which this plan applies."*

Despite it being a key purpose, the draft water plan does not include any specific measures, strategies or other mechanisms to reverse degradation that has occurred to environmental values from taking and interfering with water for consumptive purposes within the water plan area.

**Recommendation:** Include specific strategies in the new water plan to reverse degradation that has occurred to environmental values from the take and interference of water for consumptive purposes within the water plan area.

**1.2 Significant watercourse reaches**

In addition to the environmental values under s27 (4) of the draft plan, other matters that must be considered when making decisions about surface water in significant watercourse reaches are:

- Ensuring the flows required to maintain floodplain habitats and off-stream wetlands are provided,
- Ensuring that significant watercourse reaches remain connected to other parts of the watercourse,
- Ensuring that natural flow regimes are maintained to the greatest extent possible and,
- Reversing degradation that has occurred to environmental values in the significant watercourse reach from the take and interference of water for consumptive purposes

As it will assist in achieving the environmental outcomes under s19 (c) (i), (ii) and (iii) of the draft plan, QCC strongly recommends that the section of the Mary River downstream from the Barrage is designated as a significant watercourse reach under s12 of the draft water plan.

**Recommendations:** Designate the section of the Mary River downstream from the Barrage as a significant watercourse reach and include the above dot points in s27 (4) of the new water plan

### **1.3 Environmental Protection (Water and Wetland Biodiversity) Policy 2019 (EPWWBP)**

Under s45 (2) (b) of the Act, the Minister is required to consider the Environmental Values (EVs) and Water Quality Objectives (WQOs) established under the EPWWBP when making a draft water plan.

Despite this requirement, the draft plan does not contain any specific provisions, strategies or other measures to ensure that the EVs and WQOs established under the EPWWBP for the Mary Basin water plan area are maintained and achieved.

**Recommendation:** Include specific provisions, strategies and/or other measures in the new water plan to ensure that EVs and WQOs for the Mary Basin water plan area are maintained and achieved.

### **1.4 Ensuring water is used efficiently**

Under s2 (g), a key purpose of the *Water Act 2000* (the Act) is to promote the efficient use of water through:

- (i) the establishment and operation of water markets,
- (ii) the initial allocation of water,
- (iii) the regulation of water-use if there is a risk of land or water degradation and,
- (iv) Increasing community understanding of the need to use and manage water in a sustainable way

While the draft plan contains provisions to address (i) and deliver (ii) of s2 (g) of the Act, the draft plan does not include provisions to regulate water use if there is a risk of land or water degradation or to increase the community's understanding of the need to use and manage water effectively and efficiently.

**Recommendation:** In accordance with s2 (g) of the Act, include specific provisions in the new water plan to regulate the use of water if there is a risk of land and water degradation and to increase community awareness of the need to use water efficiently.

### **1.5 Environmental outcomes**

Along with ensuring the flows required to achieve the environmental outcomes under s19 (1) of the draft plan are provided, the new water plan must also contain specific provisions, strategies and other measures to ensure that water quality is maintained to optimise the ecological health of flow dependent species and ecosystems.

**Recommendation:** Include specific provisions, strategies and other measures in the new water plan to optimise water quality in order to maintain and enhance the ecological health of flow dependent species and ecosystems.

### **1.6 Measures for achieving water plan outcomes**

Under s20 of the draft plan, additional measures that need to be included to achieve the new water plan's outcomes are:

- Assessing the new water plan's effectiveness in maintaining and improving the productivity of the Great Sandy Straits Ramsar wetlands, the Great Barrier Reef and estuaries within the water plan in the monitoring, evaluation and reporting strategy the chief executive must develop by 20 December 2024 under s20 (1) of the draft water plan,
- Assessing the new water plan's effectiveness in maintaining water quality across the water plan area in the monitoring, evaluation and reporting strategy the chief executive must develop and,
- In accordance with s2 (g) of the Act, actively increasing the community's understanding of the need to use water efficiently

**Recommendation:** Include the above matters in s20 of the draft water plan.

### **1.7 Unallocated water**

#### **a) Reduction of strategic reserve**

As it will greatly enhance the ecological resilience of flow dependent species and ecosystems, QCC strongly supports the reduced volume of the strategic reserve in the draft water plan compared to the volume of the strategic reserve in the existing water plan.

#### **b) Other matters that the chief executive must consider**

Along with the matters under s33 (1) of the draft water plan, other matters the chief executive must consider when releasing unallocated water includes:

- The effect of the take and interference of water will have on the ecological characteristics of the Great Sandy Straits Ramsar wetlands and the Outstanding Universal Value of the Great Barrier Reef World Heritage Area,
- Whether the proposed take or interference of water is located within a significant watercourse reach,
- Whether the proposed take of water will cause adverse impacts to the quality of underground water and,
- Whether the proposed take of water will exacerbate the effects of climate change on the availability of water for environmental and existing consumptive purposes.

**Recommendation:** Include the above matters in s33 (1) of the draft water plan.

### **1.8 Converting existing area-based licences to volumetric licences**

Under s48 (3) (b) of the draft plan, working out the nominal volume for area-based licences under the existing water plan is to be calculated by multiplying the stated area on the pre-amended licence by 6.

As there is a high risk of it causing a range of unforeseen adverse impacts to environmental values and other water users alike, QCC does not support the proposed blanket approach to converting existing area-based licences to volumetric licence under the draft plan.

To ensure that unintended adverse impacts do not occur, QCC strongly recommends that a more nuanced approach is utilised when converting the existing area-based licences across the water plan area to volumetric licences under the new water plan, which should be based on the actual water requirements of the intended crops/land use, soil types of the area to be irrigated and proximity of the area that will be irrigated to designated significant watercourse reaches and other sensitive ecological receptors.

**Recommendation:** Replace the proposed approach for converting existing area-based licences under s48 (3) (b) of the draft plan with a more nuanced approach described above.

### **1.9 Additional criteria for deciding applications for underground water**

Along with the criteria under s51 (1) of the draft water plan, other matters the chief executive must have regard to when deciding applications to take and interfere with underground water includes whether the proposed take and interference will:

- Effect underground water levels, pressure and quality
- Cause saltwater incursions in coastal aquifers and,
- Effect other underground water users

**Recommendation:** Include the above matters in s51 (1) of the draft water plan.

### **1.10 Include the Maroochy River**

Other than in schedule 1 and 2, the Maroochy River is not referenced in the main body of the draft water plan.

To rectify this oversight, s 19 (1) (d) of the draft water plan must be amended to include the Maroochy River.

**Recommendation:** Include the Maroochy River in s19 (1) (d) of the draft water plan.

### **1.11 Additional environmental outcomes**

Along with the matters under s19 of the draft water plan, other outcomes that need to be included in this section of the draft water plan to ensure that flow dependent species and ecosystems are enhanced includes:

- Amending s19 (1) (d) of the draft plan to read '*for the Mooloolah River, the Noosa River (and the Maroochy River) and their tributaries—maintain and if possible, improve flow regimes that support the rivers, tributaries and estuaries*' and,
- Amending s19 (1) (e) (ii) to read '*the hydraulic habitat requirements of ecological assets in the river, tributaries, floodplains and estuary.*'

**Recommendation:** Include the above matters in s19 of the draft water plan.

### **1.12 Measuring take of water**

In accordance with the Queensland non-urban water measurement policy implementation plan, the new Mary Basin Water Plan must contain provisions requiring water entitlement holders to install meters to measure the take of water from the Cooloola Sandmass sub-artesian area.

**Recommendation:** Include provisions in the new water plan to facilitate the requirement for water entitlement holders to install meters to measure the take of water from the Cooloola Sandmass sub-artesian area.

## **2. Draft Water Management Protocol (WMP)**

### **2.1 Water monitoring**

Under s39 (1) of the draft WMP, the chief executive must also measure and record:

- Surface and underground water quality across the water plan area and,
- Salt water intrusion in coastal aquifers,

Under s39 (2) of the draft WMP, the chief executive must also collect information on:

- Overland flow harvesting and storage infrastructure construction trends

**Recommendation:** Include the above matters in s39 of the draft WMP

## **3. Draft Water Entitlement Notice (WEN)**

Other information that needs to be incorporated in the WEN to better inform water entitlement holders, the public and other parties include clearly identifying the water entitlements that are:

- Located in significant watercourse reaches,
- Likely to cause impacts to First Nation people's cultural values and,
- Likely to affect the delivery of critical environmental services and functions

**Recommendation:** Include the above-mentioned information in the WEN

## **4. Conclusion**

As they will greatly enhance the ecological health of flow dependant species/ecosystems, the Great Sandy Straits and the Great Barrier Reef, we urge you to incorporate the above-mentioned recommendations in the new Mary Basin Water Plan.

Please do not hesitate to contact me should you require any further information or clarification regarding any of the matters raised in this submission. Please also note that QCC fully endorses MRCCC's submission to the draft Mary Basin Water Plan.

Regards,



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