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Jane Doolan, Commissioner
National Water Reform inquiry
Productivity Commission
Locked Bag 2
Collins Street East
MELBOURNE VIC 8003

By Email: water.reform.2020@pc.gov.au

Dear Dr Doolan

Re: AgForce Submission to National Water Reform Inquiry 2020

Thank you for the opportunity to provide comment on the second National Water Reform Inquiry (the Inquiry).

AgForce is the peak organisation representing Queensland's cane, cattle, grain and sheep & wool producers. The cane, beef, grain, sheep & wool industries in Queensland generated around $7.3 billion in on-farm value of production in 2018-19. AgForce's purpose is to advance sustainable agribusiness and strives to ensure the long-term growth, viability, competitiveness and profitability of these industries. Almost 5,400 farmers, individuals and businesses provide support to AgForce through membership. Queensland producers provide high-quality food and fibre to Australian and overseas consumers and contribute significantly to the social fabric of regional, rural and remote communities.

Overview

Regional, rural and remote (RRR) communities, primary production businesses and producers' livelihoods are built around access to water. Environmentally sustainable water use planning is vital to the future production of food and fibre.

How governments choose to manage and allocate water is a key policy area for broadacre agriculture in Queensland and one in which AgForce is actively progressing industry and member interests at state and national level. AgForce liaises with governments to provide input into water planning processes and communicates to our members and industry more broadly about opportunities to take part in consultation processes relevant to their catchment.

The National Water Initiative (NWI) is a key strategic guiding document for governments and stakeholders and it is timely that its principles are revisited.

To instil the confidence needed for making significant financial and personal investments, agricultural water users must know that their rights of access to water are secure and that their share of available water is certain, both now and into the future.

There are a number of key general guiding principles that inform AgForce policies on water resources. These include the following:

- Water is a vitally important resource and needs to be managed to secure its environmental, social and economic values
- To sustain access and associated ecosystems, planning and management should avoid risks to the long-term sustainability of water resources
- AgForce supports the cost-effective use of objective, scientific information to guide water resource management decisions, including the release of unallocated water
- The water resource planning process in Queensland is supported as it sets up a system of entitlement security, enables tradability and is designed to plan for sustainable management to meet future consumptive and environmental water requirements.
- Where water resources are at risk of over-use, there may be a need to manage demand through the use of targeted regulation, noting the primacy of basic livestock and domestic rights and that planning and management decisions should be transparent, efficient and equitable.

AgForce is of the view that the Queensland Government has generally made good progress on achieving NWI-identified outcomes through a relatively constant water reform agenda over the past decade. This has included good stakeholder consultation processes (NWI paragraph 95), including its Water Engagement Forum and catchment level engagement. It has also resulted in a level of 'reform fatigue' that needs to be considered and addressed in any forward program.

The NWI has limited visibility through to agricultural water users, having its influence via state government policies and management approaches and greater public awareness would help support transparency and a commitment to continuing reforms in a steady and staged manner.

Our submission will seek to make comment on the Commission's identified questions and where issues are identified will endeavour to provide some principles to inform potential solutions.

Recommendations:
1. Greater public awareness of the NWI and its successors would help support transparency and a commitment to continuing reforms of water planning and management.

Current or emerging water management challenges

Within the limitations of ensuring certainty and entitlement holder confidence, the NWI outcome of providing for adaptive management in order to meet productive, environmental and other public benefit outcomes is supported for the flexibility it offers in addressing emerging risks.

The Commission has identified current and future climate change as a major challenge and AgForce's policy on climate change is available on our website[1]. Queensland is in the grip of a severe and long-lasting drought, which has also put significant pressure on water resources, environments, users and their communities.

Queensland's water plans provide a framework within which periods of climate-related deficiency can be managed and the state government has recently formalised the consideration of climate change effects. AgForce supported this more formal inclusion and noted that those impacts to be managed should be those expected within the life of a plan rather than for long-term modelled predictions, which can represent an opportunity cost to productive consumptive uses.

Whilst Queensland Water Plans take into account expected deficiencies using entitlement reliabilities of less than 100%, the drought highlighted that not all Queensland communities enjoy adequate water supply security eg, Stanthorpe, Miriam Vale, etc.

[1] https://agforceqld.org.au/climate

Whilst the state government has taken some steps to address this, there is a need for a strategic plan on water supply security and the benefits to economic activity that security would support.

Recommendations:
2. AgForce supports formal inclusion of climate change effects, noting that those impacts to be managed should be those expected within the life of a plan to avoid unnecessary opportunity costs.
3. There is a need for further work in Queensland on a strategic plan to ensure water supply security for drought-affected communities.

Water entitlements and planning
AgForce supports the NWI principles around delivering stronger and more clearly defined entitlements, producing a property right interest that drives productive and sustainable use of water. Such security of entitlements must not be diminished by governments seeking to achieve other outcomes, at least without due compensation.

Stock and domestic access (NWI paragraphs 55 and 56)
Stock and domestic (S&D) uses are not included clearly enough or prioritised highly enough in the NWI. To clarify, stock purposes means watering stock of a number that would normally be depastured on the land on which the water is, or is to be, used. As such it has intrinsic volume limits related to land capability.

Water used for S&D purposes is negligible compared to Queensland's total water use and has generally been declining in volume over time. The long-term mean (1911 to 2015) runoff in Queensland is 79 mm[2], equal to 136,190 GL in total across the state (1,723,936 km^3). Queensland beef herd numbers totalled 11.2 million head in 2014/15 plus 2.2 million sheep and lambs. Using annual DNRME stock water use allowances (20 and 4m^3 respectively[4]), livestock use is in the order of 232 GL or **just 0.17%** of total runoff, accepting some level of uncertainty around this figure.

Given these relatively negligible volumes, water used for S&D purposes is a basic landholder right and should not be tradeable, metered (unless voluntarily), nor subject to water pricing regimes.

With its essential nature for occupation of land, take of water for S&D use should be prioritised over and not compromised by other competing consumptive uses in resource planning and management decisions. Providing a statutory right within the planning framework to extract water for grazing livestock uses should be considered by government, particularly for freehold land and pastoral leases, similar to the statutory rights provided by government to resource companies for use of associated water unavoidably taken in accessing energy and mineral resources. For example, if government approves the use of leased land specifically for livestock grazing purposes then a statutory right to the water needed to undertake that purpose is appropriate, as has been enacted in Queensland for enabling resource companies to undertake their approved activities, including on-going evaporative losses from residual final voids after project de-commissioning.

Under current arrangements, licensing of S&D takes is only required where the resource becomes at risk of being overused, such as in peri-urban contexts and bores in the Great Artesian Basin. Where water resources are at risk of over-use, non-livestock demands should be managed using targeted regulation to ensure access to the share of the available resource is protected.

New take relating to residential or rural-residential sub-division should be planned for and monitored so there is no risk of overuse. Authorisation for takes for domestic purposes should not be expanded to the point that it has a negative impact on other users. This should be managed on a catchment by catchment basis. This includes the size of domestic gardens, recently expanded by the Queensland Government, and their use for commercial (sale of product) or trading purposes.

[2] Regional water information, http://www.bom.gov.au/water/rwi/#sf_tt/001/2016, accessed 21 June 2017
[3] 7121.0 - Agricultural Commodities, Australia, 2014-15, ABS
[4] Stock or domestic allowance notification form, DNRM, 2016

Recommendations:
4. As an intrinsic landholder right of limited volume, stock and domestic uses need to be more explicitly included and prioritised in the NWI principles guiding water planning and management.
5. Stock water takes should be considered as a statutory right, given it is intrinsically needed for the use of land for grazing livestock and has intrinsic volume of take limitations.

New releases

AgForce is supportive of the release of unallocated water that can be made available without compromising the environment or the supply to existing water users.

Where adequate information about a catchment's water resources is available, the Queensland government does appear to release new entitlements at the most secure configuration appropriate. Where this does not occur, such as in recent Gulf of Carpentaria unallocated water releases, this points to an ongoing need to invest in better understanding those hydrological systems as emerging demand dictates, as per NWI paragraph 33(ii).

As part of promoting transparency and better investor preparedness, a more predictable and demand responsive schedule for release of unallocated water should be considered for inclusion in the NWI principles (NWI paragraph 64vi). The state government is taking ongoing steps to make unallocated water available, including temporary release of infrastructure related reserves and this is supported and has been largely effective. Further efforts on and incentives towards getting un- or under-utilised entitlements into productive use, without compromising property rights, are also indicated (NWI paragraph 71).

Water use efficiency requirements should only be applied at release of water entitlements and not applied subsequently to existing entitlements to preserve holder confidence in their security. If applied, they should also be outcome-based and not prescriptive in how to achieve those desired outcomes.

Recommendations:
6. AgForce is supportive of the release of unallocated water that can be made available at the greatest level of security justifiable without compromising the environment or the supply to existing water users.
7. Where inadequate information about hydrological systems is limiting either the description or release of unallocated reserves, or subsequent entitlement security, then governments should proactively invest in building that knowledge base.
8. As part of promoting transparency and better investor preparedness, a more predictable and demand-responsive schedule for release of unallocated water should be considered for inclusion in the NWI principles.
9. Water use efficiency requirements should only be applied at release of water entitlements and not applied subsequently to existing entitlements, to preserve holder confidence in their security.

Extractive industries

The Commission has previously identified that extractive industries and alternative water sources (such as recycled water) should be better incorporated into the entitlement framework. AgForce agrees that more can be done to increase the transparency within which resource sector access to water is assessed and included in planning.

NWI paragraph 34 describes a project by project 'by exception' approach rather than taking an alternative and blanket approach to all resource projects. A criticism voiced by AgForce and other stakeholder groups is that there are 'two sets of rules' applying to resources and other users and this is reinforced by having multiple legislative Acts applying to this take. This could be addressed by further integration of resource use into the same planning framework and process by which other consumptive uses are managed. This approach also applies to indigenous consumptive uses for economic purposes.

Recommendations:
10. Further effort is required to increase the transparency within which resource sector access to water is assessed and included in planning, preferably by clearly including it in the same framework alongside other consumptive uses.

Water markets and trading

Due to its capacity to provide flexibility in water availability and use and to free up asset value, AgForce supports voluntary water trading within transparent markets where it does not reduce the reliability of existing water entitlements. Queensland has a relatively immature water trading market, compared to the southern MDB and thin price discovery avenues.

A key challenge that is not addressed by simply leaving consumptive water distribution to market forces and contestability is achieving depth of socio-economic resilience in regional communities. This resilience is supported by ensuring diversified economies can develop, an outcome that can be impeded if apportionment is left simply to who can pay most for water with the risk that a narrow based economy will develop, more susceptible to boom and bust cycles. We have seen an example of an unforeseen global disruptor and consequences in COVID-19. Releasing a range of product types, suitable for a range of applications, is advisable and the Queensland government already does this to an extent through the system of Reserves (Strategic, General and, recently, Indigenous Reserves) within catchments. This could be more clearly identified in the NWI.

Recommendations:
11. NWI principles could more clearly include the supporting of diversified economies to grow socio-economic resilience, such as through promoting the use of a range of water product types, particularly at initial release of unallocated water.

Water accounting and compliance

NWI paragraph 80 states that *'the outcome of water resource accounting is to ensure that adequate measurement, monitoring and reporting systems are in place in all jurisdictions, to support public and investor confidence in the amount of water being traded, extracted for consumptive use, and recovered and managed for environmental and other public benefit outcomes'*.

Confidence that users are respecting theirs' and others' rights to water is essential for investor confidence in resource management and for broader community expectations around fair and sustainable water management.

The Commission concluded in 2017 that jurisdictions should better report on the use of planned environmental water and improve non-urban metering and the Queensland Government is rolling out their Rural Water Measurement Program in response to developments in the MDB.

It is important that in seeking to deliver effective transparency and accountability that the requirements placed on water users are fair, cost effective and in proportion to the risk of non-compliance in a catchment. There is no evidence of widespread non-compliance in Queensland.

While metering can provide objective, scientific information to guide water resource management decisions, the benefits of metering must be weighed up against the significant costs on bore owners of doing so. Transparency towards the public should also not come at the cost of personal privacy or mandated release of individual commercial-in-confidence information. Reporting of use information held by governments into the public domain should only be done at an aggregated level where individuals cannot be identified.

As a basic right with intrinsic volume limits linked to the number of animals that would be normally grazed on the land, water used for livestock and farm domestic purposes should ***not*** be metered unless the landholder voluntarily chooses to do so. Sustainable grazing capacity of various land types is well known as are the required livestock water intakes under a range of environmental conditions. So, the potential total take of water can already be reasonably accurately estimated. As an enabler of water allocation trading and to support sustainable resource management, AgForce supports metering of irrigator water use.

As monitoring of water use contributes to public policy decisions and sustainable access for all users a contribution by government to monitoring costs is appropriate.

Recommendations:
12. In seeking to deliver effective transparency and accountability, the requirements placed on water users must be fair, cost effective and in proportion to the risk of non-compliance in a catchment.
13. Reporting of use information into the public domain should only be done at an aggregated level where individuals cannot be identified to manage the risk of the loss of personal water user privacy or release of individual commercial-in-confidence information.
14. Water used for livestock and farm domestic purposes should not be metered unless the landholder voluntarily chooses to do so.

Environmental water management

Water planning and management in Queensland is required by legislation to meet environmental sustainability requirements (s2 of *Water Act 2000* (Qld)) which are outlined in catchment level water plans.

A significant amount of water taken in Queensland and particularly in the MDB, is unsupplemented water, which does not allow control of the delivery of environmental water through planned releases from storages. Within unsupplemented water management systems the environment takes its share of the water (and of the risk) to achieve identified ecological outcomes, while still ensuring socio-economic outcomes can be achieved.

Greater integration between environmental water management and complementary waterway/NRM management activities, as found by the Commission in 2017, should not come at the cost of inefficient and contradictory regulatory duplication as was seen under the disastrous Wild Rivers Act framework.

Similarly, AgForce is concerned about considerations around integrating water quality management with water quantity management in relation to its potential for unnecessary complexity and regulatory creep on farming practices. The state government already manages water quality outcomes and environmental values through the *Environmental Protection Act 1994* and Regulation, the Environmental Protection (Water and Wetland Biodiversity) Policy 2019, the *Water Act 2000* and the *Planning Act 2016* as well as non-legislative management plans, Best Management Practice programs to address diffuse emissions from rural lands, and report cards. Due to its sustained effectiveness and partnership approach, AgForce supports voluntary, incentive-based program, such as in Reef catchments and land use planning guidelines. The Commission is referred to AgForce's submissions on Reef regulations: https://agforceqld.org.au/submissions.

In some catchment plans, such as the recently developed Cape York Water Plan, required end of system flows for environmental purposes are well in excess of what the CSIRO scientists have indicated are sustainable in similar catchments on Cape York. Such a large buffer comes at a socio-economic opportunity cost to local residents.

Recommendations:
15. Greater integration between environmental water and complementary waterway/NRM management activities, and any integration of water quality and water quantity management, should not come through inefficient and complex regulatory duplication, as was imposed by the Wild Rivers framework in Queensland, but through voluntary, partnership programs.
16. Required end of system flows for environmental purposes, such as in Cape York, should reflect actual environmental needs and not impose significant socio-economic opportunity costs on local landholders through unnecessary restrictions on consumptive uses.

MDB catchments

AgForce supports alternative approaches to the management and use of already held environmental water, such as the use of temporary water markets and mechanisms like 'no-pump' contracts to maximise the value of this water across a broader range of outcomes or shared benefits while not

compromising environmental objectives (NWI paragraph 35iii). Any water efficiency expectations on consumptive water users should also be applied to managers of environmental water.

The Commonwealth Environmental Water Office is encouraged to look at more flexible uses of held water for environmental outcomes (NWI paragraph 55), such as supporting the application of the land rehabilitation technique water ponding by land managers, with these uses allowed to be applied under MDB accredited water plans instead of the current 'no growth in take' blanket restriction approach.

Non-flow toolkit/complementary measures to deliver environmental outcomes are also supported as a better way than continuation of socially-damaging water buybacks.

Recommendations:
17. AgForce supports maximising the value of held environmental water across a broader range of outcomes or shared benefits while not compromising environmental objectives, including its use for complementary land rehabilitation initiatives, and applying water use efficiency expectations.

Water recovery efforts

The Issues Paper outlines that *'In terms of recovering water for environmental outcomes (for example through the purchase of water on the market or through infrastructure investments) the NWI states that the measures adopted should be 'primarily on the basis of cost-effectiveness, and with a view to managing socio-economic impacts'. In 2017, the Commission found water recovery approaches had not been undertaken primarily on the basis of cost-effectiveness and investigated this in more detail in its Basin Plan inquiry (PC 2018)*.

Socio-economic impact management is a key and valid reason that water recovery approaches had not been undertaken primarily on the basis of cost-effectiveness. The capping of buybacks and obtaining further scientific information about the Northern Basin have been rational tools in balancing up the interests of restoring the MDB environment with social and economic needs of irrigation-dependent communities.

Recommendations:
18. Water recovery approaches in the Murray Darling Basin need to avoid and minimise socio-economic impacts as of primary importance, alongside any consideration of cost-effectiveness.

Indigenous water use

The Issues Paper states that *'In 2017, the Commission noted that any supply of water provided to Indigenous communities for economic development should be from within existing water entitlement frameworks, and that supporting arrangements be provided by jurisdictions to ensure communities can maximise the value of the resource'.*

The state government has made a significant effort to engage with Indigenous communities concerning water planning and management and this consultation is supported. There have also been steps taken to more clearly include indigenous cultural and economic interests in water plans, particularly on Cape York Peninsula, including via the *Mineral, Water and Other Legislation Act 2018*. The Commission is encouraged to look at the additional restrictions placed on permanent trading of indigenous CYPHA water entitlements as well as other additional and associated restrictions on other water users in relation to accessing water, which is already delaying access to non-Indigenous AgForce members[5]. This seems contrary to the principles on trading in the NWI and concerning if it forms a precedent for other catchments.

While supporting provision of water for indigenous uses, it is vital that this is done in such a way as to avoid impacts on existing entitlement holders, including indigenous farming interests and the environment. AgForce endorses the following policy relating to indigenous cultural water:

[5] https://www.dnrme.qld.gov.au/__data/assets/pdf_file/0003/1446285/cape-york-waterplan-ministers-consideration-report.pdf, page 29 and following

1. AgForce supports stakeholder consultation in water resource planning and management, including that of Indigenous peoples
2. AgForce supports the provision of water for Indigenous use, but only where this does not result in third party impacts to existing entitlement holders, including the environment
3. AgForce supports the use of existing held and planned environmental water entitlements for the co-benefit of Indigenous cultural water use
4. AgForce supports the use of existing market mechanisms to acquire Indigenous water entitlements from willing sellers for contemporary economic use
5. Allocation of water within unallocated reserves (including strategic, general and Indigenous) should be equitable across stakeholder groups and with a consistent methodology that is applied across the state
6. AgForce acknowledges that the ownership framework for Indigenous water entitlements for contemporary economic use is a matter for governments and Indigenous peoples however, additional restrictions to Indigenous entitlements that unnecessarily constrain trading should be removed
7. If the above framework were adopted, the current hierarchy and security of water entitlements, as enshrined in state legislation, would be respected and therefore unaffected.

Recommendations:
19. AgForce supports stakeholder consultation in water resource planning and management, including that of Indigenous peoples and the provision of water for Indigenous use, but only where this does not result in third party impacts to existing entitlement holders and the environment.
20. AgForce supports the use of existing market mechanisms to acquire Indigenous water entitlements from willing sellers for contemporary economic use.
21. Allocation of water within unallocated reserves (including strategic, general and Indigenous) should be equitable across stakeholder groups and with a consistently applied methodology.
22. AgForce acknowledges that the ownership framework for Indigenous water entitlements for contemporary economic use is a matter for governments and Indigenous peoples however, additional restrictions to Indigenous entitlements that unnecessarily constrain trading should be removed.

Water services

The Issues paper states that '*The NWI parties agreed to implement a number of actions for how water services would be delivered to rural, regional and metropolitan customers to meet the NWI objectives. These included water pricing and institutional arrangements that (among other things):*

- *promote economically efficient and sustainable use of water resources, water infrastructure assets, and government resources devoted to the management of water*
- *ensure sufficient revenue streams to allow efficient delivery of the required services*
- *give effect to the principles of user-pays and achieve pricing transparency in respect of water storage and delivery in irrigation systems and cost recovery for water planning and management'*.

Best practice pricing

Water pricing by schemes for irrigation is an ongoing challenge for stakeholders to deliver affordability, efficient infrastructure maintenance and cost recovery for government water management services. Similarly, in an urban supply context local governments are also underfunded and infrastructure maintenance costs are not being met consistently. AgForce has supported calls for greater state funding of regional urban infrastructure[6] in light of this shortfall and as alternative funding sources are continually declining.

Upper and even lower bound pricing (NWI paragraphs 64 and 66v) places considerable pressure on irrigation businesses, who also face rising electricity costs and supplying consumers who do not pay the full cost of production, including the environmental costs. There is also a multiplier effect

[6] LGAQ proposal for a Regional Water Quality and Wastewater Protection Fund to update and improve vital infrastructure: lgaq.asn.au/news/article/851/-500-million-needed-for-water-security-in-rural-communities

throughout a community of irrigated agricultural production and the support services that it requires and the employment that it offers.

The viability of multiple schemes is under pressure as the high costs of water and electricity for pumping forces irrigators to leave and the burden of cost recovery falls more heavily on remaining users. These factors contribute towards slow progress towards lower bound pricing. The state government is transitioning to local management for a number of schemes and time will tell if that model is more effective at delivering affordable water and sustainable infrastructure.

The calculation and apportionment of dam safety costs is an emerging challenge that should be considered closely in the next iteration of the NWI. There is benefit in developing further the rationale behind risk sharing and how these costs are apportioned between downstream population centres, who are the primary beneficiaries of safer structures and the users who benefit from the take of water from the storage.

In light of affordability challenges and the wider public outcomes of supporting irrigated agriculture, state government cost recovery (s68) for planning services is relatively low[7]: *Generally, water fees and charges listed under schedule 12 and 14 of the* Water Regulation 2016 *recover only a small proportion of the total water planning and management costs incurred by DNRME*. This could be viewed from the perspective of the relative shares of the total resource that environmental and consumptive uses represent across Queensland, given the rights to all water vest in the state.

Given the broad range of benefits from additional water supply security, particularly in light of the global challenge of climate change, governments support is indicated and transparency around this support and the benefits it delivers is supported, such as reported community service obligations (CSOs). Where the community benefits, the community should also contribute not only water users.

Recommendations:
23. Future approaches to water pricing should address affordability challenges to irrigators, including considering the broader public benefits, and further develop the rationale behind risk sharing around dam safety and how safety costs are apportioned between beneficiaries.

Investment in new water infrastructure

Water security requires protection of existing rights and attracting new investment into reliable, affordable and sustainable supplies of water to support agricultural development and towns. Responsible for planning to meet Queensland's current and future water needs, the state government should commit to an ambitious, evidence-based infrastructure investment program, while promoting greater use of existing water supplies and reserves.

Delivering and using safe, secure and affordable supplies of water lifts the productivity and reliability of agricultural production and boosts long term employment, economic activity and liveability in many regional towns. These benefits flow to all Queenslanders through high-quality, reliable local food supplies and attractive alternatives to higher density urban living for current and future generations. Well planned and sited projects can deliver these outcomes in a targeted and environmentally sustainable way.

AgForce supports the application of transparent benefit-cost analysis prior to government funding being committed and ensuring potential infrastructure projects are nation building and productive. We supported the establishment of the National Water Infrastructure Development Fund and the National Water Infrastructure Loan Facility and are interested to see if the National Water Grid Authority is more successful in the conversion of studies to infrastructure.

As for water pricing, AgForce would like to see the wider and longer-term flow-on benefits of government investment in water to be recognised and included in cost/benefit investment calculations.

[7] https://www.business.qld.gov.au/industries/mining-energy-water/water/authorisations/fees

Recommendations:
24. AgForce would like to see the wider and longer-term flow-on benefits of government investment in water infrastructure to be recognised and included in cost/benefit investment calculations.

Other issues

Paragraph 90(iv) of the NWI references facilitating water trading between and within the urban and rural sectors and this is an area that would benefit from a closer examination by government. For example, AgForce has supported the use of recycled urban water from the Western Corridor in SE Queensland for irrigation purposes in the Lockyer Valley and potentially the Darling Downs[8]. This would also decrease the outflow of that water into Moreton Bay with associated environmental changes. Such projects delivering complementary outcomes, if these can be accommodated into the infrastructure assessment framework, can offer significant efficiencies.

Recommendations:
25. Facilitating water trading between the urban and rural sectors, such as of recycled water, is an area that would benefit from a closer examination by government.

Conclusion

AgForce would welcome a face to face or online meeting with the Commission to discuss our submission in more detail.

For any questions on this submission please contact General Manager – Policy, Dr Dale Miller on (07) 3236 3100 or via email (millerd@agforceqld.org.au).

Yours sincerely

Georgie Somerset
General President

[8] https://www.business.qld.gov.au/industries/mining-energy-water/water/industry-infrastructure/supply-planning/nwidf-feasibility-studies