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Irrigation
Committee
- Central Downs
Irrigators Limited
- Fitzroy Basin Food
& Fibre
- Pioneer Valley
Water Board

9th April 2009

Ms I Arnaud

Director

Water Market Section

Department of the Environment, Water, Heritage and the Arts

GPO Box 787

Canberra ACT 2601

Dear Ms Arnaud,

Re: Submission to draft Water Amendment Regulations 2009

QFF has reviewed the draft regulations under sections 4(1) and 91(1)(d) of the Water Act 2007.

These proposed changes mean that schemes in the Qld Murray Darling catchments that involve the storage and delivery of water primarily on-river including private water boards will now be subject to water charge rules to be made by the Commonwealth Minister for Climate Change and Water. These rules are to achieve a range of charging objectives such as full cost pricing, moving to upper bound pricing and recovery of environmental externalities. The rules may also provide for the ACCC to determine bulk water charges or accredit arrangements for their determination by State agencies.

These changes will have significant implications for the schemes in the Qld Murray Darling catchments. Irrigator customers are particularly concerned that they will be subject to policies and processes that will be different from other schemes in Queensland.

While it is recognised that the Water Act 2007 provides for these amendments to be made by regulation and these changes are required to remedy a gap in the provisions of the Act, there is inadequate opportunity provided by such a regulatory amendment process to consider the implications for our schemes either inside or outside the Basin. This is particularly, the case when your Department provides just one week for a response.

Given the implications of these changes, it is important that QFF, together with schemes inside and outside the Basin in Queensland, have the opportunity to examine the implications of these changes with the Queensland Government. This is appropriate as we understand that, consistent with the Referral Intergovernmental Agreement, any changes involving the referred provisions of the Commonwealth Water Act 2007 requires the approval of the Premiers of each Basin State.

QFF looks forward to providing further response on this matter once we have had the opportunity for discussions with the Qld Government.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Dan Galligan', written in a cursive style.

Dan Galligan
CEO