Statement of intent

Draft Water Amendment Plan (Fitzroy Basin) 2020

August 2020
Foreword

I am pleased to release this statement of intent that accompanies the draft Water Amendment Plan (Fitzroy Basin) 2020 (the draft amendment plan) and draft Fitzroy Basin water management protocol. These amendments will facilitate the establishment of a water management framework for water allocations associated with Rookwood Weir on the Fitzroy River.

The Rookwood Weir Project is a joint Commonwealth and Queensland Government initiative that will deliver vital water infrastructure to Central Queensland. The $352 million project will drive new economic and employment opportunities for the agricultural industry and will underpin urban and industrial water security for Rockhampton, the Capricorn Coast and Gladstone regions.

The Queensland Government aims to maximise the benefits that this infrastructure can deliver to the region and allow flexibility to adapt to changing demands as the agricultural industry in the area grows and evolves.

My department is working closely with the project proponent Sunwater to coordinate consultation on the planning framework and market engagement. Consultation through the planning process will ensure that the weir delivers the water needs of the community, while maintaining environmental water needs.

The release of the draft amendment plan follows initial consultation with the community from April to June 2020. My department and Sunwater have engaged with representatives from AgForce, Queensland Farmers’ Federation, local water users and irrigator groups, Rockhampton Regional Council, Livingstone Shire Council, Gladstone Area Water Board, Traditional Owners, environmental groups and the community. The draft amendment plan and supporting instruments reflect what we have heard about the importance of securing water for the future and shows how issues raised in consultation have been considered.

The draft water amendment plan is now available for public review and comment.

I encourage anyone with an interest in the water resources of Central Queensland to read this statement of intent along with the accompanying draft amendment plan and supporting documents. Please contribute to the finalisation of this draft amendment plan by making a submission about any issues of interest or concern to you.

Your feedback will ensure that the final amended plan meets the needs of the community in Central Queensland.

Dr Anthony Lynham

Minister for Natural Resources, Mines and Energy
Acknowledgement of the Traditional Owners of the Fitzroy Basin water plan area

The Department of Natural Resources, Mines and Energy acknowledges and pays respect to the Traditional Owners in the Fitzroy Basin water plan area of Queensland. The contributions of earlier generations, including the Elders, who passed on their knowledge of natural resource management, are valued and respected.

The department acknowledges that the Traditional Owners of this region have a deep cultural connection to their lands and waters and that there is a need to recognise Traditional Owner knowledge and cultural values in water planning.
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1 Purpose

The proposed Rookwood Weir on the Fitzroy River will make available an additional source of water for the community in Central Queensland. The water planning framework allows for this additional source of water to be granted as water allocations for use for agriculture, towns and industry.

The Minister for Natural Resources, Mines and Energy has released a draft Water Amendment Plan (Fitzroy Basin) 2020 (the draft amendment plan) to facilitate the establishment of the water planning framework. At the same time, the draft Fitzroy Basin water management protocol has also been released by the chief executive for consultation and public comment.

This document provides information on the intent and the effect of the draft amendment plan. It explains how and why the water plan is being amended, the factors that were considered in the preparation of the draft amendment plan, the key changes and the reasons behind them.

The information contained in this document is intended to promote informed feedback to aid the community’s understanding of key elements of the draft amendment plan.

The key aim of the draft amendment plan is to include new provisions that—

- provide for the construction of Rookwood Weir
- promote economic development, employment opportunities and water security in the Central Queensland region, which is heavily reliant on agriculture
- aid the economic recovery of regional Queensland in the wake of COVID-19
- create a measure in the plan that ensures at least 50 per cent of water from Rookwood Weir is allocated for agricultural purposes
- provide for amendment of supporting instruments including in relation to trading rules, water sharing rules, environmental management rules and monitoring requirements.

The draft amendment plan also amends existing management arrangements, which apply to other parts of the Fitzroy Basin plan area.

The release of the draft amendment plan provides an opportunity for engagement with stakeholders about the Minister’s proposals.

Available documents

Relevant documents are—

- Notice of availability of draft amendment plan
- Draft Water Amendment Plan (Fitzroy Basin) 2020
- Draft Water Management Protocol 2020

Accessing the draft planning documents

Copies of the above documents are available at www.dnrme.qld.gov.au
2 Background

2.1 Rookwood Weir

The site of the Rookwood Weir Project is approximately 66km south-west of Rockhampton and was a key component of the Lower Fitzroy River Infrastructure Project (LFRIP). The LFRIP was declared a Coordinated Project on 6 May 2011, with the Coordinator-General's Evaluation Report (December 2016) recommending that the project proceed subject to conditions. A map indicating the location of Rookwood Weir and its extent can be viewed in Attachment 1.

In February 2017, the Commonwealth Government approved the LFRIP under the Environment Protection and Biodiversity Conservation Act 1999 (Cth), subject to conditions.

In 2018, the State and Commonwealth governments agreed to jointly fund the estimated $352 million Rookwood Weir on a 50:50 basis, and Sunwater was nominated as the project proponent.

The Rookwood Weir Project is capable of yielding 50,000 megalitres of high priority water (equivalent to roughly 76,000 megalitres of medium priority water), with at least 50 per cent of this water to be allocated for irrigated agriculture. With less than 5,000 megalitres currently used for irrigation in the region Rookwood will supply to, this new water represents an enormous opportunity for growth.

The minimum 38,000 megalitres of medium priority water that will be available for irrigation exceeds anticipated market demand for water in the medium to long-term. Other ongoing investigations to optimise water use within the schemes Rookwood Weir will supply to, as well as potential options to expand the allocation of water for irrigation beyond the 50 per cent minimum, mean the project will be able to support the region’s agricultural growth for decades to come.

It should also be noted that once this important infrastructure project is complete and a final yield from Rookwood is known, there will be further potential to use the remaining volume from the total unallocated water reserve of 76,000 megalitres in the Fitzroy River.

Rookwood Weir was declared as a prescribed project by the Minister for State Development, Tourism and Innovation by gazettal in May 2020. A prescribed project declaration enables the Coordinator-General, if necessary, to intervene in state and local government approval processes to ensure timely decision-making for the prescribed project.

2.2 Water planning framework

The Water Act 2000 (the Water Act) provides the legislative framework for the sustainable planning, allocation and management of water resources in Queensland.

Water plans, such as the Fitzroy Basin (Water Plan) 2011, provide the principal mechanism for achieving the requirements of the Water Act for sustainable allocation and management of water resources, setting out detailed strategies and outcomes for water to be shared among water users, including the environment. The water planning framework consists of—

Overarching legislation


Subordinate legislation

- Water Regulation 2016
- Water plan.
Statutory instruments

- Water entitlement notice
- Water management protocol

Other associated documents

- Resource operations licence
- Operations manual.

The initial water plan, the Fitzroy Basin Water Resource Plan (WRP), was developed in 1999 and underwent a full review and replacement in line with legislative requirements in 2011. The Resource Operations Plan (ROP) commenced in 2004, with a review performed in 2014 to support the new WRP. In 2015, the WRP and the ROP were amended to give effect to changes that were made to the Water Act to improve the water planning framework. In 2016, the WRP was transitioned into a Water Plan (WP) due to the changes made to the Water Act.

Subsequently, in 2018 the ROP was split, transitioning some provisions into the water plan and the remaining provisions into different operational instruments in the form of a water management protocol, as well as operations manuals and operations licences for each of the water supply schemes in the plan. The changes aimed to streamline future operational improvements and place more control in the hands of water supply scheme operators, while mandating consistency with water plan outcomes, measures and objectives. Some provisions from the ROP document are still to be included in the Fitzroy Basin water plan.

An explanation of the water planning instruments and their contents is in Attachment 2.

2.3 Market engagement and tender process for water sales

The Sunwater-led water sales and marketing activities for Rookwood Weir are being run in parallel with the draft amendment plan consultation.

These activities are being carried out as part of the two-step process:

1. An initial tender (Tender One) which commenced 26 June 2020 seeking bids for medium priority (MP) water allocations of 500 ML or greater and closed 21 July 2020. Submissions are currently under assessment.

2. Tender Two for smaller lots of less than 500 ML of MP water allocations which is expected to be conducted in 2022. Sunwater is currently accepting expressions of interest from landholders interested in obtaining assistance from Sunwater to prepare for this second tender process.

For more information on Sunwater’s tender process, visit www.sunwater.com.au and search for ‘Rookwood Weir’.

3 Preparing the draft amendment plan

The 2011 water plan is now being amended to support the construction and operation of Rookwood Weir. Figure 1 provides a summary of the water planning process to amend the water plan.

Community engagement underpins the planning process and occurs at a number of stages in the plan amendment process, including the initial notice of proposals to amend the plan and the release of the draft amendment plan.
Figure 1: Water planning process for amending the Water Plan (Fitzroy Basin) 2011
3.1 Notice of proposal to amend and statement of proposals

The water planning process formally commenced in April 2020 when the Minister published a notice of proposals to amend the water plan. A statement of proposals was released for public comment to provide affected and interested parties an opportunity to learn more about the proposed amendment to the Water Plan (Fitzroy Basin) 2011. The statement of proposals outlined the Minister’s intention to—

- provide for the construction of Rookwood Weir
- determine the appropriate mix of water for agriculture, town water supply, and other purposes
- creation of new water trading zones
- provide for amendment of supporting instruments including trading rules, water sharing rules, environmental management rules and monitoring requirements.

Due to social distancing requirements imposed by the COVID-19 pandemic, consultation with the community was restricted to one-on-one phone meetings and targeted conference call workshops with stakeholder groups following the release of the Statement of proposals. Seventeen submissions were received from a range of stakeholders including local water users and entitlement holders, community groups and government entities.

Key issues raised during consultation on the Statement of proposals are outlined in Attachment 3 including how the issues have been considered in the planning process of the former and new draft amendment plan.

3.2 Hydrological assessments

Hydrological assessments have been prepared to support the development of the draft water amendment plan. These assessments consider the impacts and effects of the new infrastructure to proposed and existing water entitlements in the plan area.

Hydrological models developed by the Department of Environment and Science are used to support water planning in the Fitzroy Basin area and have informed the draft water amendment plan. The use of the Fitzroy Integrated Quantity-Quality Model (IQQM) ensures that decisions made about the allocation and management of water in the plan area continue to be supported by the best available science.

Sunwater has undertaken preliminary hydrologic modelling using the Fitzroy IQQM to assess the volume and range of allocation types that can be provided from the proposed infrastructure. This work also tested the potential effect of water allocation configurations on the performance of new and existing water allocations as well as implications for environmental flows. The hydrologic modelling outputs were reviewed by Department of Environment and Science.

3.3 Timelines for amendments

The construction of new water infrastructure is a complex process where key information and certainty can be ascertained only after certain milestones are met. In assessing the timeframes, the department has taken a staged process to amend the planning instruments. Table 1 outlines each stage of the process and the estimated completion date.

Section 4 of this document discusses the current stage 1 of the process.
Section 5 gives more detail about the subsequent processes, which require more detailed knowledge of the operation of the weir and relies on the completion of the water sales process and further modelling based on these sales.

Table 1 – Timeline of amendment processes for planning instruments

<table>
<thead>
<tr>
<th>Stage of process</th>
<th>Purpose</th>
<th>Estimated completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stage 1 amendments:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water plan amendment</td>
<td>Sets framework and includes arrangements for supplemented water allocations for Rookwood Weir</td>
<td>March-April 2021</td>
</tr>
<tr>
<td>Water Management Protocol amendment (Stage 1)</td>
<td>Includes provisions relating to other water management areas</td>
<td></td>
</tr>
<tr>
<td>Resource Operations Licence (Stage 1)</td>
<td>Support the construction of Rookwood Weir through issuing a construction resource operations licence</td>
<td></td>
</tr>
<tr>
<td>Water plan expiry</td>
<td>As the water plan is due to expire September 2021, a process is due to take place in 2021 to extend, amend, or review the plan.</td>
<td>September 2021</td>
</tr>
<tr>
<td>Stage 2 amendments:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Water Management Protocol amendment (Stage 2)</td>
<td>Defines dealing rules (including trading rules) for supplemented water allocations associated with the weir as well as dealing rules (including trading and sharing rules) for unsupplemented water allocations in the Lower Fitzroy.</td>
<td>2022</td>
</tr>
<tr>
<td>Resource Operations Licence (Stage 2) and Operations Manual</td>
<td>Defines the operation of Rookwood Weir, to be released along with the commissioning of the weir.</td>
<td></td>
</tr>
</tbody>
</table>
4 Stage 1 amendments – seeking feedback now

The department is now seeking feedback on the stage 1 amendments outlined in this section.

4.1 Planning documents

A summary of the draft amendment plan and supporting documents is provided in Table 2 below.

Table 2 – Components of the draft amendment plan and supporting documents

<table>
<thead>
<tr>
<th>Planning document</th>
<th>Responsibility/delegation for approval</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Draft water amendment plan</td>
<td>Minister</td>
<td>Amends the Water Plan (Fitzroy Basin) 2011 to provide for—\n</td>
</tr>
<tr>
<td>Draft water management protocol</td>
<td>Chief Executive (Department of Natural Resources, Mines and Energy)</td>
<td>Amends the current water management protocol (2019) and implements the draft water amendment plan by—\n</td>
</tr>
<tr>
<td>Resource operations licence</td>
<td>Chief executive (Department of Natural Resources, Mines and Energy)</td>
<td>Creates a new resource operations licence that allows the proponent of the project (Sunwater) to commence construction of the weir.</td>
</tr>
</tbody>
</table>
4.2 Creation of new zones and amending existing supplemented zones

The identification of trading zones facilitates the movement of water entitlements within zones—either permanently or seasonally—to provide flexibility for water users. Zones are also used to define where trading can occur and how water sharing rules are applied. Permanent trading of water allocations involves the permanent transfer of a water allocation title to someone else, similar to the sale of a land title. These dealings must be registered in the Water Allocations Register. The decision to permanently trade all or part of a water allocation is entirely up to the holder of that allocation.

The draft water amendment plan contains provisions for supplemented water allocation zones and trading zones for the new Rookwood Weir Water Supply Scheme. These zones will be named zones A through E. The boundaries for zones A, B and C for Rookwood Weir Water Supply Scheme align with the existing boundaries for zones A, B and C in the Lower Fitzroy Water Supply Scheme and the Fitzroy Barrage Water Supply Scheme. The boundary for zone D for the Rookwood Weir Water Supply Scheme will extend from the upstream limit of the Eden Bann Weir pond to Rookwood Weir. The boundary for zone E for the Rookwood Weir Water Supply Scheme will extend from Rookwood Weir to the upstream limit of the Rookwood Weir pond on the Mackenzie River and Dawson River.

Attachment 4 contains a map that outlines the boundaries of these new zones which will be included in the water plan amendment.

4.3 Unallocated Water

4.3.1 Release of unallocated water from the strategic water infrastructure reserve

The current water plan states there is 76,000 megalitres of unallocated water in the strategic water infrastructure reserve that may be granted for water infrastructure on the Fitzroy River. The Rookwood Weir Project is capable of yielding approximately 50,000 megalitres of high priority water (which is equivalent to around 76,000 megalitres of medium priority water), subject to final design. The Statement of proposals sought feedback from the community to determine the appropriate mix of entitlements to be granted from Rookwood Weir between agricultural, urban, and industrial users while maintaining maximum flexibility.

The department is committed to allocating at least 50 per cent of the total yield associated with the Rookwood Weir Project for agricultural purposes. This means that the minimum volume allocated from the project for agricultural purposes is estimated to be 25,000 megalitres of high priority (or around 38,000 megalitres of medium priority). Section 21A of the draft amendment plan includes a new proposed measure to ensure that if water is released for infrastructure from the project in the Fitzroy River (under section 45(c) of the Water Act), that 50 per cent of the volume released must be allocated to agricultural users.

The draft water management protocol includes the volumes from the unallocated water reserve identified in feedback on the Statement of proposals. Table 3 outlines the reserve volumes for Gladstone Area Water Board and Livingstone Shire Council. Final volumes are subject to change due to uncertain operational details and demand. The purpose of any new entitlements is stated as “Any”, to enable more choices for the entitlement holders and facilitate trading.
Table 3 – Indicative volumes for unallocated water release

<table>
<thead>
<tr>
<th>Water Use</th>
<th>Indicative Volumes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Industrial and Urban Water (Gladstone Area Water Board)</td>
<td>Up to 16 500 ML of HP (if taken from upstream of Rookwood Weir or 10% less than this if taken from a river location downstream of the weir*)</td>
</tr>
<tr>
<td>Urban Water (Livingstone Shire Council)</td>
<td>Up to 6 500 ML of HP (if taken from upstream of Rookwood Weir or 10% less than this if taken from a river location downstream of the weir*)</td>
</tr>
<tr>
<td>Agricultural (non-urban) water users</td>
<td>At least 50 per cent of the estimated total volume of high priority (or equivalent medium priority) water is to be allocated for agriculture</td>
</tr>
</tbody>
</table>

* Hydrologic assessments of the volumes yielded by the Rookwood Weir Project take into account the instream losses that might be expected to occur when delivering water from the weir to meet the water demands of downstream water users. Although the exact volume of such losses will vary depending on the size, timing and pattern of water releases through the Lower Fitzroy system, on average, around 10% of the volume of water that is released from the weir to meet downstream water users’ demands might be expected to be lost in transit due to instream seepage.

4.4 Water allocation security objectives (WASOs)

WASOs provide a measure of how allocations would have been expected to perform using simulated historical data, assuming full use of existing water entitlements. They do not represent a prediction or guarantee of future performance of water allocations in any particular year. Instead, actual performance will depend on prevailing climatic factors, water demand distribution patterns and decisions by water users. WASOs are ordered by Water Allocation Groups, which for supplemented water are used to identify security of supply for particular priority groups (high priority or medium priority). This facilitates consistent management decisions for an entire group of water allocations, rather than considering the impacts of each individually.

WASOs provide a benchmark for the department to assess any impacts on the probability of water users being able to obtain water under a water allocation. These impacts may include future water resource development, changes to management strategies or operational changes to infrastructure. This ensures that these potential impacts are adequately assessed against the benchmark a WASO provides to ensure a water user’s ability to access water after the proposed change, for each water allocation group, is not diminished.

4.4.1 Surface water WASOs for existing supplemented water allocations

The draft amendment plan does not change the WASOs for existing supplemented surface water allocations in the lower Fitzroy. The WASOs for supplemented surface water assert that performance must not be less than the stated performance indicator expressed as the monthly and (where indicated) the annual supplemented water sharing index. The monthly water sharing index is the percentage of months in the historical modelled period in which an entitlement holder’s monthly water demand is able to be met, while the annual water sharing index means the percentage of years in the simulation period in which the allocations are fully supplied.
WASOs for supplemented surface water users will continue to apply in the Lower Fitzroy Water Supply Scheme and the Fitzroy Barrage Water Supply Scheme.

1) The WASOs for water allocations in a high priority group are that:
   a) the annual supplemented water sharing index is to be at least 94 per cent; and
   b) the monthly supplemented water sharing index is to be at least 98 per cent.

2) The WASO for water allocations in a medium priority group is that the monthly supplemented water sharing index is to be at least 82 per cent.

4.4.2 WASOs and priority groups for new supplemented water allocations

New supplemented water allocations created as a result of the construction of Rookwood Weir shall fall into the following priority groups—

• a new high priority group above Rookwood Weir
• a new medium priority group above Rookwood Weir
• a new medium priority group downstream of Rookwood Weir
• the existing high priority group downstream of Rookwood Weir

Appropriate provisions will be included in future amendments to the water management protocol to enable conversion of water allocations between the above four priority groups.

The newly created supplemented priority groups will have the same WASOs as those for the existing Lower Fitzroy Water Supply Scheme and Fitzroy Barrage Water Supply Scheme supplemented water allocations.

1) The WASOs for water allocations in a high priority group are that:
   a) the annual supplemented water sharing index is to be at least 94 per cent; and
   b) the monthly supplemented water sharing index is to be at least 98 per cent.

2) The WASO for water allocations in a medium priority group is that the monthly supplemented water sharing index is to be at least 82 per cent.

4.5 Don and Dee Rivers and Alma Creek Rules

Existing provisions in the water plan and water management protocol that administer the Don and Dee Rivers and Alma Creek have led to complex rules which are difficult to manage and do not give the desired outcome for the irrigators. The draft water amendment plan and draft water management protocol create new provisions to simplify and clarify these rules.

4.5.1 Surface water

Currently, the water management protocol contains provisions for water sharing rules (WSR) for the water management area. The area operates under interim seasonal water assignment (SWA) and interim water sharing rules (WSR) which are restrictive. However, the plan does not currently allow the chief executive to develop and implement SWA and WSR in the area.

The draft amendment plan creates new provisions that allow for the development of SWA rules and WSR. The rules for SWA are included in the draft water management protocol. The current WSR provisions in the water management protocol will be removed as they are deemed unnecessary. Further investigation of the water resource needs to be undertaken before any new WSR are considered for inclusion.
4.5.2 Groundwater

Currently there are groundwater SWA and WSR in place managed under the Water Regulation 2016. It is proposed to transition the rules into the water management protocol.

In particular, existing SWA rules contain a volume cap and also limit of assignment volume based existing entitlement. However, there is an interim agreement to allow for the cap to be re-assigned regardless of existing entitlement percentage. The draft amendment to the water management protocol allows for a more streamlined application process to remove application limit per transition.

Existing WSR will be transitioned to the water management protocol, however issues have been raised with the transparency of the current rules. Further monitoring and assessment of the water resource is required.

4.6 Prospect Creek and Upper Callide groundwater management areas

Provisions for water sharing rules in the Prospect Creek and Upper Callide groundwater management areas currently exist in the Water Regulation 2016. It is proposed to move these provisions from the Water Regulation into the amended water management protocol. As the water planning framework applies to groundwater licences in the area, the Water Act provides for the rules to be included in the water management protocol rather than the regulation. This will provide greater clarity about the rules that apply in the water plan area.

4.7 Water licence zones

The draft water amendment plan contains provisions to state groundwater sub-area zones and water licence zones in the Fitzroy Basin water plan area. There are maps in the draft amendment plan for these zones 4A and 4B. The groundwater sub-area zones and water licence zones apply to the following existing water management areas—

• Don and Dee Rivers water management area
• Alma Creek water management area
• Don and Dee Rivers groundwater management sub-area
• Prospect Creek groundwater management sub-area
• Upper Callide groundwater management sub-area

The intent of these provisions is to ensure management strategies which apply to allocation trading are similarly adopted for water licence trading.

4.8 Finalising transitional arrangements

The Water Reform and Other Legislation Amendment Act 2014 amended the Water Act 2000 to implement water reforms, including make the water planning framework more contemporary and responsive. The Act took effect on 6 December 2016. Among these amendments were changes to the water planning framework, including transitioning particular strategic arrangements stated in the resource operations plan into the water plan. The draft water amendment plan will complete the transition for the following provisions—

• stating the types of water licence applications that may be accepted and decided
• stating what types of water licence dealing applications are inconsistent with the water plan
• stating trading zones for transitional rules for water licences on maps in the schedules of the water plan
• stating the ability to grant overland flow water licences under the Act for a process stated in the water management protocol
• changing references to water resource plans and resource operations plans to water plans and water management protocols, respectively
• clarifying that applications for new water licences to interfere with water by diversion may be accepted
• clarifying the types of applications for dealings with water licences which interfere with water that can be accepted
• adding and amending references to the Water Act
• restructuring and contemporising provisions and terminology
• updating cross references and linkages with other documents
• removing some provisions that are no longer dealt with in a water plan.

4.9 Resource operations licence

To support the construction of Rookwood Weir, a Resource Operations Licence (ROL) must be granted to the owner of the infrastructure prior to construction within the river – currently scheduled for after the 2020/21 wet season.

The ROL will have initial parameters specified but will be further amended in 2022 to include operational rules once the operational rules for the scheme have been developed as part of a future operations manual.

5 Stage 2 amendments

The operational instruments for implementing the water plan in relation to Rookwood Weir will be amended and/or created in preparation for wet commissioning of the weir in early 2024. Wet commissioning is when the weir will be operated for the first time. Table 1 contains information about what is included in each instrument.

5.1 Further water management protocol amendments

The water management protocol will undergo further amendments closer to the date of the commissioning of the weir. These are expected to include changes to the water sharing rules for unsupplemented water allocations to ensure that access is maintained after Rookwood Weir has been constructed and becomes operational.

Operational rules and arrangements associated with Rookwood Weir will require further information from the outcome of the water tender process and detailed modelling associated with those allocations. Trading rules for new supplemented water allocations can only be properly specified within the water management protocol once the operational rules for the scheme have been developed. These are critical inputs and precursor steps for the future amendment of the protocol.

Stakeholders will be invited to review and provide feedback on proposed amendments when the water management protocol is amended in the future.

5.2 Operations manual

The operations manual will state the seasonal water assignment rules and water sharing rules. The seasonal water assignment rules will allow for temporary or seasonal trading of water allocations within their respective zone and priority group. All or part of the water allocation can be seasonally assigned to another person or place to meet short-term water needs in accordance with the rules. All
seasonal trades will require approval by Sunwater. These rules are not able to be completed until the design of the weir is finalised and modelling is undertaken. The operations manual must be in place prior to the wet commissioning of the weir.

Stakeholders may be invited to review and provide feedback on the proposed operational arrangements for the weir when a draft operations manual is published in the future.

5.3 Resource operations licence amendments

As discussed in Table 3, the initial resource operations licence (ROL) is anticipated to be finalised around the time that the proposed amendments to the water plan are finalised to support the construction of the weir (stage 1 amendment). A ROL contains information about the operation of the infrastructure including environmental management rules and monitoring requirements. These rules require the final design and operating arrangements to be developed informed by further modelling (stage 2 amendment).

6 Consultation and submission process

Release of this draft amendment plan marks the start of consultation and the formal submission period. These submissions inform the development of the final amendment plan. Submissions will close on 29 September 2020.

The department in partnership with Sunwater will provide a number of opportunities for community and stakeholder engagement. Information is available on the department's website including instructions on registering for specific opportunities. Engagement activities will need to consider the current situation around COVID-19 travel restrictions and social distancing requirements.

Phone appointments can be requested by filling in a contact form at www.dnrme.qld.gov.au

The release of this statement of intent, draft amendment plan and associated planning instruments, provides an opportunity for anyone interested in this process to review the materials and provide feedback.

6.1 How to make a submission

You are invited to make a submission on issues you believe should be considered in finalising the draft Water Plan (Fitzroy Basin) Amendment Plan 2020. You are also encouraged to make a submission if you support proposals in the draft water amendment plan or any of the associated supporting documents.

Submissions must be made in writing and include the name, address and signature of the person or persons making the submission. An authorised officer (such as the executive officer or secretary of a committee) must sign submissions made by entities or interest groups. Email and internet submissions will be accepted and are considered to have been ‘written and signed’.

All properly made submissions and any issues raised during consultation will be considered in finalising the water amendment plan. A report summarising the issues raised and how the issues were addressed will be released with the final amendment plan.

Submissions must be made in writing to the chief executive on or before 5pm, 29 September 2020.
Submissions can be made by—

1. by printing and completing the submission form available at www.dnrme.qld.gov.au (Attachment 5)
2. by completing the online form at www.getinvolved.qld.gov.au
3. by email to FitzroyWaterPlan@dnrme.qld.gov.au
4. by post to—
   Department of Natural Resources, Mines and Energy
   Manager
   Water Services
   PO Box 1762
   Rockhampton QLD 4700
   Attn: Fitzroy Water Plan Coordinator

Submissions should identify any information that is considered confidential. The Queensland Government will endeavour to maintain the confidentiality of information that is identified in this way, however submissions are subject to the Right to Information Act 2009 and information may be required to be released upon requests made under this Act. Other legal obligations, such as the processes of the courts or natural justice, may also override confidentiality.

7 Where to from here

The draft amendment plan and associated planning instruments will be finalised following the submission period and review of submissions. All properly made submissions and the referral panel's recommendations will be considered when finalising the amended water plan and associated instruments. Once approved, the final amendment plan will become subordinate legislation to the Water Act and replace the existing water plan. The approval of the amended water plan will be published in the Queensland Government Gazette.

A consultation report which summarises the issues raised during the consultation process and how they were addressed will be released following finalisation of the amended water plan.

Once the amended water plan is released and water sales are finalised, further development of water planning instruments will be undertaken, along with consultation with the public.
Attachment 1: Map of Fitzroy Basin water plan area and Rookwood Weir location

Figure 1 – Map of Rookwood Weir site in Fitzroy Basin plan area
## Attachment 2: Summary of contents of water planning instruments

### Table 4 – Summary of contents of water planning instruments

<table>
<thead>
<tr>
<th>Water plan</th>
<th>Water management protocol</th>
<th>Resource operations licence</th>
<th>Operations manual</th>
<th>Water entitlement notice</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Plan area</td>
<td>• Water trading rules</td>
<td>• Owner of the scheme to apply for a resource operations licence for construction and operation</td>
<td>• Operational rules for the scheme</td>
<td>• Temporary document to convert or grant water entitlements</td>
</tr>
<tr>
<td>• Plan outcomes</td>
<td>• Water sharing rules and seasonal water assignment rules for unsupplemented water</td>
<td>• Water releases from dams</td>
<td>• Water sharing rules and seasonal water assignment rules for water allocations supplied by the weir</td>
<td></td>
</tr>
<tr>
<td>• Measures and strategies to achieve outcomes</td>
<td>• Purposes and locations of unallocated water</td>
<td>• Granted to the owner of infrastructure associated with the scheme</td>
<td>• Water releases from dams</td>
<td></td>
</tr>
<tr>
<td>• Performance indicators</td>
<td>• Permitted and prohibited changes to water allocations</td>
<td>• Roles and responsibilities of scheme operators</td>
<td>• Water sharing rules and seasonal water assignment rules for water allocations supplied by the weir</td>
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<tr>
<td>• Environmental flow objectives</td>
<td>• Defines dealing rules (including trading rules) for supplemented water allocations associated with the weir</td>
<td>• Details watercourses used for distribution, infrastructure details, environmental management rules and monitoring and reporting requirements</td>
<td>• Water releases from dams</td>
<td></td>
</tr>
<tr>
<td>• Water allocation security objectives</td>
<td>• Operational rules for the scheme</td>
<td>• Operational rules for the scheme</td>
<td>• Water sharing rules and seasonal water assignment rules for water allocations supplied by the weir</td>
<td></td>
</tr>
<tr>
<td>• Volume of water available for allocation</td>
<td>• Owner of the scheme to apply for a resource operations licence for construction and operation</td>
<td>• Water releases from dams</td>
<td>• Operational rules for the scheme</td>
<td></td>
</tr>
<tr>
<td>• Water trading zones</td>
<td>• Water trading rules</td>
<td>• Owner of the scheme to apply for a resource operations licence for construction and operation</td>
<td>• Water sharing rules and seasonal water assignment rules for water allocations supplied by the weir</td>
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</tbody>
</table>

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Draft Water Amendment Plan (Fitzroy Basin) 2020 – Statement of Intent
Department of Natural Resources, Mines and Energy, August 2020 16
Attachment 3: Summary of issues raised on the Statement of proposals and how they have been considered in developing the draft water amendment plan

Public submissions were invited on a Statement of proposals to amend the Fitzroy Basin water plan to include Rookwood Weir. A total of 17 submissions were received about the Fitzroy Basin Statement of proposals. Issues raised by submitters were considered in preparing the draft amendment plan and associated instruments and are summarised below.

Table 1 – Summary of issues raised in the statement of proposals consultation process, and the department’s proposed response

<table>
<thead>
<tr>
<th>Issue raised</th>
<th>Issue description</th>
<th>Proposed response</th>
</tr>
</thead>
</table>
| Maximum height and capacity of Rookwood Weir | • Concerns were raised about the proposed height and maximum capacity of the Rookwood Weir.  
• Submitters were concerned about the reduced capacity of Rookwood Weir and the associated allocation for agricultural use. | • This issue is out of scope for the water plan.  
• Sunwater is responsible for the design and construction of the proposed Rookwood Weir.  
• The water plan establishes the framework for allocating water from the weir.  
• The original Rookwood Weir proposal was for a gated structure that was significantly more expensive to build than first estimated. To achieve maximum water yield and deliver the project within the $352.2 million budget, a decision was made in August 2019 to change the design from a gated to ungated structure. This was due to design requirements that could not be managed within the budget available. |
| Water supply - pipeline | • A request was made for a pipeline to be constructed from Rookwood to Gladstone rather than the proposed Rockhampton to Gladstone pipeline.  
• Similarly, a request was made for a water line to be established.  
• These requests were made to improve water access to more locals and for livestock. | • This issue is out of scope for the water plan.  
• Sunwater is responsible for the design and construction of the proposed Rookwood Weir.  
• Currently this proposal does not include a pipeline. Distribution infrastructure and schemes may be reviewed when an indication of the volumes and locations of water sales become apparent.  
• Improvements to water access for stock and domestic use are related to distribution networks. Sunwater or local... |
<table>
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<tr>
<th>Issue raised</th>
<th>Issue description</th>
<th>Proposed response</th>
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</thead>
</table>
| Economic viability                   | • Three submitters raised concerns about the economic viability of the Rookwood Weir. These concerns were about the water allocation composition, uptake of the agricultural water allocations and included a recommendation to pre-sell medium priority water for agricultural use prior to construction of the Rookwood Weir.  
• The need to apply precautionary principles, achieve ecologically sustainability and minimise economic risk was also raised. | • This issue is out of scope for the water plan. The water plan establishes the framework for allocating water from the weir.  
• The Queensland and Commonwealth governments have each committed $176.1 million to Rookwood Weir as they recognise that the project is an opportunity to create regional jobs during the construction phase and generate greater economic activity in the Rockhampton and Gladstone regions through investment in high-value agriculture. Furthermore, the weir will bolster the water security of the region.  
• Sunwater is providing the market with multiple opportunities to participate in the purchase of medium and high priority water allocations from Rookwood Weir. Access to this water is expected to be available in early 2024.  
• Sunwater’s approach to water sales will maximise the opportunity for any interested party to participate in the procurement (including large and small purchasers). |
| National Water Initiative (NWI) cost recovery principles | • One submitter raised concerns about the compliance with the National Water Initiative cost recovery principles.  
• Particularly that the Queensland Government has agreed to implement NWI water pricing principles, including setting charges for water products and services in order to recover costs associated with new and replacement water storage and supply infrastructure. | • This issue is out of scope for the water plan.  
• The Commonwealth Government has committed to co-fund the project with $176.1 million to be sourced through the National Water Infrastructure Development Fund – Capital Component which requires that infrastructure is managed in accordance with the principles of the National Water Initiative. |
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<th>Issue raised</th>
<th>Issue description</th>
<th>Proposed response</th>
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<tr>
<td>• Concerns were raised about the</td>
<td>• Concerns were raised about the proposed changes to the water allocations for Rookwood Weir, generating less revenue from the sale of water, the costs associated with constructing and operating the weir are unlikely to be recovered from the sale of water as per the NWI cost recovery requirements.</td>
<td>• The issue of climate change is addressed through the planning process. The Fitzroy Basin water plan is underpinned by hydrologic modelling that has taken into account the effects of climate change. At the review of the plan in 2011, the department modelled a full development scenario, which included the construction of Rookwood Weir. The model was tested against a number of potential climate change scenarios, ensuring that climate change effects were incorporated when developing water entitlements and unallocated water volumes.</td>
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<td>proposed changes to the water</td>
<td>• Two submitters recommended that the water related effects of climate change on the availability of water under section 45(2)(g) of the Water Act be considered in preparing the amendments to the Fitzroy Basin water plan.</td>
<td>• Water Allocation Security Objectives are based on modelling that includes consideration of climate change. The reliability of water allocations takes into account any future changes to water availability due to climate change.</td>
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<td>allocations for Rookwood Weir,</td>
<td>• Another submitter expressed that the hydrological modelling utilised did not include the associated impacts of climate change on long-term water security and alternative crops relative to a change in market demand, and the possible restrictions on future water allocations for water intensive crops.</td>
<td>• The department periodically reports on changes to the climate as part of the reporting requirements in the planning framework. The model will undergo a review when the plan is due for a review.</td>
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<td>generating less revenue from the</td>
<td>• It was noted that it was imperative that under a changing climate and longer drought periods, the long-term viability of investment by farmers can be sustained by providing long-term, higher reliability water.</td>
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<td>sale of water, the costs</td>
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<td>associated with constructing and</td>
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<td>operating the weir are unlikely</td>
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<td>to be recovered from the sale of</td>
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<td>water as per the NWI cost</td>
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<td>recovery requirements.</td>
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<tr>
<td>Climate change</td>
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<tr>
<td>Interests of Aboriginal parties</td>
<td>• Two submitters recommended that the interests of any Aboriginal parties or Torres Strait Islander parties in relation to the water resources for the plan area be considered in the drafting of the amended water plan, under section 45 (2) (h) of the Water Act.</td>
<td>• This issue is addressed through the undertaking of consultation with Aboriginal parties as part of the water planning process. The department directly approached indigenous groups to provide a submission for the statement of proposals. The department will continue to engage indigenous groups throughout the water plan amendment process.</td>
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<td>or Torres Strait Islander parties</td>
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<td>Issue raised</td>
<td>Issue description</td>
<td>Proposed response</td>
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<td>Water speculators</td>
<td>• Three submitters raised concerns about water speculators and the scope of buyers allowed to purchase water rights. It was also recommended that water allocations are not released to speculative non-landholder investors.</td>
<td>• The water plan establishes the framework for allocating water from the weir and a trading framework already exists within the Fitzroy Basin water plan area. This issue is therefore out of scope for the water plan.</td>
</tr>
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<td></td>
<td></td>
<td>• Sunwater is responsible for the tender and sale of water allocations from Rookwood Weir. All tender applications must provide a business plan to demonstrate how the required water will be used and how this will contribute to the local economy. Any individual and organisation seeking to secure a water allocation will need to satisfy requirements to participate in the sales process.</td>
</tr>
<tr>
<td>Water quality</td>
<td>• One submitter raised concerns about water quality concerns during times of inundation and also due to vegetation clearing for construction. Support was also given to the introduction of offsets as per Sunwater’s Offsets Strategy and Offset Management Plan to alleviate localised impacts from land management practices into the Fitzroy Basin as per Queensland and Australian Government requirements to meet Great Barrier Reef water quality targets.</td>
<td>• The existing water plan for the Fitzroy Basin includes a number of environmental safeguards that will need to continue to be met when the weir is constructed and operational. Any changes to water management due to the weir will need to comply with all existing environmental flow objectives. The modelling undertaken to date by Sunwater assessed the additional allocation scenarios against the existing flow objectives. All mandatory environmental flow objectives were met.</td>
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<td>• An environmental impact statement (EIS) was completed by Sunwater and it assessed the environmental impacts of the construction and operation of the weir. The EIS, as well as the Coordinator-General’s evaluation report on the EIS, concluded that any adverse environmental impacts from the project can be acceptably managed through the meeting of conditions as set by Queensland Government agencies, such as DAF and DES. Similarly, under the Commonwealth’s EPBC Act, conditions specifically target flora and fauna offset conditions to account for inundation.</td>
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<tr>
<td>Issue raised</td>
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<td>Proposed response</td>
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| Unallocated water        | • It was suggested that the water plan consider allocations be made available for ‘Urban and Industrial use’ instead of a specific identified customer.  
• One submitter requested flexibility in the draft plan so as not to unnecessarily constrain the volumes of unallocated water to be granted to infrastructure projects.  
• It was requested that the draft plan support the ability to maximise the opportunities for water creation in the region based on future demand.                                                                                                                                                                                                                                                                                                                                                                         | • The department has committed to maintain certainty for urban water supply by making allocations available for specific users. Commitments have been made to provide water for the Gladstone Area Water Board (GAWB) and the Livingstone Shire Council.  
• The draft amendment plan does not propose to change any unallocated water volumes in the plan. The draft water management protocol specifies volumes for GAWB and Livingstone Shire Council. This does place any constraints on the intended allocation of water released for the Rookwood Weir Project.  
• The draft amendment plan includes a measure to ensure that at least 50 per cent of the unallocated water reserve that is allocated for agricultural use.                                                                                                                                                                                                                       |
| Water security/priority groups | • Support for the current water allocation security objectives for high and medium priority supplemented water allocations stated in the water plan was given.  
• It was recommended that the water allocations in the Fitzroy River should remain in their current priority group or water allocation group.  
• The need for new priority groups to be established based on the sale of new water from the weir.  
• Concern was raised about the water security index for the Fitzroy River Barrage due to the construction and commissioning of Rookwood Weir.                                                                                                                                                                                                                                                                  | • WASOs and priority groups for existing supplemented allocations in the Fitzroy River are unchanged.  
• New supplemented priority groups will be created which have the same water allocation security objectives as the existing allocations.  
• New priority groups have been proposed in the draft water plan (Section 4.4).  
• The project was approved by both the state and Commonwealth governments while ensuring the water security at the Barrage would not be adversely impacted.                                                                                                                                                                                                                           |
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<th>Issue raised</th>
<th>Issue description</th>
<th>Proposed response</th>
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</table>
| Water product options        | • Feedback on the three water product options outlined in the statement of proposals was mixed with no clear preference.  
• One submitter preferred option 1 while another supported water product option 3.  
• One submitter noted that the water product option proposals do not include the needs of high-water demand crop varieties in its current allocation process. Furthermore, that the proposal has not addressed the increase in water demand for tree crops and the water security required to ensure long-term economic growth for farmers wishing to invest this region and change crop production.  
• One submitter requested an increase to the volume of high priority water set aside for the Capricorn Coast. Based on the current demand estimates for the Shire and the historical no failure yield of the Water Park Creek supply, it is anticipated that 4500ML will be insufficient to meet the future demand for water out to 2041. It was requested that the high priority allocation for Livingstone Shire be increased from 4500ML to 6500ML; or that a high priority reserve be prioritised to meet the future urban water demand of Livingstone Shire. | • The options presented were designed to ensure at least 50 per cent of the volume associated with Rookwood Weir is allocated to agriculture. The draft amendment plan includes a measure to ensure this commitment is being supported.  
• The draft water management protocol specifies volumes for Gladstone Area Water Board and Livingstone Shire Council.  
• The volume set aside for Livingstone Shire Council in the draft water management protocol has been increased from 4,500 ML to 6,500 ML.  
• It is anticipated that provisions will be included in the future amendment of the water management protocol to enable the conversion of medium priority water allocations from the new scheme to high priority water allocations. The final configuration and mix of water products will therefore be finalised in the second protocol amendment. |
| Water trading                | • Generally, water trading and the need for a flexible water market was supported in a number of submissions.  
• One submitter raised concerns about water sharing and transfer                                                                                                                                                                                                                                      | • The draft water amendment plan proposes five supplemented trading zones. These zones are based on the location of instream water infrastructure and hydrologic features (such as the ponded areas upstream of weirs). These |
<table>
<thead>
<tr>
<th>Issue raised</th>
<th>Issue description</th>
<th>Proposed response</th>
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</thead>
<tbody>
<tr>
<td>involving the Fitzroy River Barrage.</td>
<td>zones will be able to trade subject to the rules in future water management protocol amendments and the operations manual.</td>
<td></td>
</tr>
<tr>
<td>Flexibility in the location where the water allocations can be seasonally used or traded is important.</td>
<td>The department has committed to incorporating all new supplemented water allocations into existing markets.</td>
<td></td>
</tr>
<tr>
<td>Trading zones should be limited to as few as possible, or trade should be allowed to occur freely across trading zones.</td>
<td>Operational arrangements will be developed in a subsequent water management protocol amendment and operations manual that detail how the existing and new water supply schemes will be managed together.</td>
<td></td>
</tr>
<tr>
<td>All allocations released as a result of the Rookwood Weir construction should be incorporated into the existing trading markets.</td>
<td>Enabling one single water trading market with flexibility in trading zones will provide ease of use for existing water allocation holders and encourage further investment.</td>
<td></td>
</tr>
<tr>
<td>Enabling one single water trading market with flexibility in trading zones will be able to trade subject to the rules in future water management protocol amendments and the operations manual.</td>
<td>Operational arrangements will be developed in a subsequent water management protocol amendment and operations manual that detail how the existing and new water supply schemes will be managed together.</td>
<td></td>
</tr>
<tr>
<td>Extent of the Rookwood Weir Water Supply Scheme</td>
<td>One submitter suggested that the amended water plan establish the downstream boundary of the new scheme at the Fitzroy Barrage, and the upstream boundary at the upstream limits of the impounded storage area of Rookwood Weir.</td>
<td>Water from Rookwood Weir will be managed under the Rookwood Weir Water Supply Scheme and extend from the upstream limits of the impounded storage area of Rookwood Weir down to Fitzroy Barrage.</td>
</tr>
<tr>
<td>Conversion of medium priority and high priority water</td>
<td>The proposal to convert medium priority water to high priority water and vice versa was supported.</td>
<td>The intent of the plan amendment is to allow conversion between high priority and medium priority water. The rules for conversion will be finalised in a subsequent water management protocol amendment.</td>
</tr>
<tr>
<td>Impacted landholders and scheme owners</td>
<td>One submitter raised concerns about how impacted parties’ interests will be protected by any proposed changes to their</td>
<td>These issues are out of scope for the water plan.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Amendments are proposed to be made to the water management protocol and</td>
</tr>
<tr>
<td>Issue raised</td>
<td>Issue description</td>
<td>Proposed response</td>
</tr>
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</tr>
<tr>
<td>operations due to the construction and commissioning of the Rookwood weir.</td>
<td>A number of recommendations for limiting impacts on existing water users were made:</td>
<td>operations manual to ensure that water sharing and operational rules will maintain access to water by existing water supplemented and unsupplemented allocation holders.</td>
</tr>
<tr>
<td></td>
<td>• That existing allocation holders receive no less water under an amended plan than under the current plan with operating rules used to ensure the yield of the existing allocation is not detrimentally impacted</td>
<td>• Detailed hydrologic modelling is underway to develop and test proposed rules for achieving this. Sunwater and the department shall consult with stakeholders in relation to proposed rules in a subsequent draft of the water management protocol and draft operation manual.</td>
</tr>
<tr>
<td></td>
<td>• That an election be made by the allocation holder to convert existing unsupplemented allocations to supplemented allocations based on the nominal volume of the allocation.</td>
<td>• Impacts on existing users and the environment are limited through the requirement to demonstrate that rules will meet existing water allocation security objectives and environmental flow objectives.</td>
</tr>
<tr>
<td></td>
<td>• That allocations are amended to include an additional ‘high flow’ condition whereby if the weir spills under certain circumstances, the water can be harvested ‘off allocation’ and not count toward the annual allocation water taken by the allocation holder under usual river flows. This could be limited to 1.5ML for each 1ML allocation owned.</td>
<td>• The draft plan does not provide for conversions between supplemented and unsupplemented allocations.</td>
</tr>
<tr>
<td></td>
<td>• That there is a further release of the general reserve to the market in the form of unsupplemented allocations to be taken up by existing unsupplemented allocation holders.</td>
<td>• The water plan continues to provide for existing water harvesting allocations that allow users to take water during high flow periods. These allocations may also be traded in accordance with rules set out in the water management protocol.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• A release process for unallocated surface water from the Fitzroy general reserve was conducted recently. There are no plans for an upcoming release. Some of the general reserve volume remains, however there are no plans to conduct another release in the near future.</td>
</tr>
</tbody>
</table>
Figure 2 – Map of the proposed Rookwood Weir Water Supply Scheme
### Attachment 5: Submission form

(Please use a ballpoint pen to complete this submission).

Title and surname

---

First name(s)

---

Address

---

Postal address (if different)

---

Organisation

---

Position

---

Telephone    Mobile

---

Facsimile    Email

---

Signature(s)    Date

---

Which interest group(s) do you primarily represent (e.g. irrigator, water harvester, groundwater user)?

---

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In which part of plan are you located (you may tick more than one box)?

- [ ] Lower Fitzroy WMA
- [ ] Lower Fitzroy WSS
- [ ] Other (please specify)
What type of water access do you have?

<table>
<thead>
<tr>
<th>☐ Supplemented surface water</th>
<th>☐ Supplemented groundwater</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ Water supply agreement</td>
<td>☐ Unsupplemented groundwater</td>
</tr>
<tr>
<td>☐ Unsupplemented surface water</td>
<td></td>
</tr>
<tr>
<td>☐ Other (please specify)</td>
<td></td>
</tr>
</tbody>
</table>

What issues in the draft water amendment plan and draft water management protocol do you support? What issues concern you? How do you think the water plan or management protocol can be improved to address these or other issues (within the scope of the proposed water amendment plan and protocol)?

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Checklist

Please follow these five steps to ensure the submission is completed correctly:

☐ Details of each person making the submission have been specified.
☐ Each person or authorised representative making the submission has signed the submission form.
☐ The grounds for making the submission, and the facts and circumstances relied on in support of the submission have been stated.
☐ If additional space is required, the box at the end of the submission form has been ticked and the detailed submission is attached.
☐ Submission made by the closing date 5pm 29 September 2020