Submission on release of general reserve unallocated water, Burdekin Basin water plan, Subcatchment E (Belyando–Suttor)

Feedback on the proposed timeframes, payment options and water products

To: Unallocated Water North, Department of Local Government, Water and Volunteers (UAW.North@dlgwv.qld.gov.au)

Attention: Cameron Venables, Senior Water Officer
From: Central Western Queensland Remote Area Planning and Development Board
Contact: Morgan Gronold, Chief Executive Officer
Date: 29 October 2026

Introduction

The Central Western Queensland Remote Area Planning and Development Board (RAPAD) is a regional organisation of the Barcaldine, Barcoo, Blackall-Tambo, Boulia, Diamantina, Longreach and Winton councils. We thank the Department of Local Government, Water and Volunteers (the department) for the opportunity to comment on the proposed release of general reserve unallocated water in Subcatchment E of the Burdekin Basin water plan area.

RAPAD's interest is in the western part of Subcatchment E. The headwaters of the Belyando River system, including Native Companion Creek, Alpha Creek and the upper Belyando River, lie around Alpha and Jericho within the Barcaldine Regional Council area, in the proposed sub-areas 1 to 3. Our comments relate mainly to these sub-areas and the adjoining sub-area 4 (Mistake Creek). RAPAD's Water for Economic Development Regional Water Strategy (2023) identified the Belyando–Suttor sub-catchment of the Burdekin Basin as the largest opportunity for surface water development in the region, and RAPAD has worked with a group of Alpha and Jericho landholders since mid-2025 to understand the opportunity, lodge expressions of interest and prepare for a release.

RAPAD supports the release and the department's intention to make water available through a range of products. The landholders we are working with are established grazing businesses that are for the most part new to irrigation and to the water licensing system. This submission is written with those applicants in mind. Its purpose is to make sure the release process is workable for small and medium local applicants, and that the opportunity is not lost to the region because of the way the release process is structured rather than a lack of demand or capability.

The submission responds to the four matters on which the department has sought feedback (timeframes, payment options, water products and the broader presentation) and related matters.

Summary of recommendations

Key recommendations:

1. Replace assessment in order of receipt with a single closing date and, where demand for a product in a sub-area exceeds the volume available, allocate the water to the applications that will deliver the greatest benefit to the community, the region and the State, assessed against published criteria
2. Publish the Terms of Sale, including the price for each product, the standard licence conditions, the application form and the assessment criteria, as soon as possible and in any case before the Christmas period, and set the application closing date no earlier than 30 June 2027

3. Publish, for each sub-area and each flow threshold, the days of opportunity and the proportion of years in which the full annual volume would have been available under the historic record based on the hydrologic model
4. Hold a face-to-face session at Alpha before applications open, provide a plain-English guide and worked example, set proportionate application requirements for small applications, prioritise watercourse determination requests and publish the sub-area boundaries as a spatial layer.

Further recommendations:

5. Make the 25 per cent deposit refundable where works cannot proceed because a required approval, such as a waterway barrier or vegetation clearing approval, is refused, or a watercourse determination changes the applicable product
6. Confirm whether the sub-area totals are fixed, and allow volume that is not taken up in one sub-area to be reallocated to a sub-area where applications exceed the offered volume
7. Confirm which gauging stations the passing flow conditions in sub-areas 1 to 4 refer to, and explain how the conditions will be measured where a station is closed
8. Publish the storage-to-catchment relationship and the method for converting storage size to a nominal overland flow entitlement, and confirm how a purchased overland flow entitlement will interact with the proposed increase to 1,000 ML of overland flow take without an entitlement
9. Confirm whether an applicant may apply for more than one parcel or product, and whether applications by related entities will be treated as one
10. Confirm that licences will be able to be relocated within a sub-area and traded
11. Confirm that Barcaldine Regional Council has been consulted on any Council entitlements or infrastructure in sub-areas 1 to 4, and that the passing flow conditions have been tested against the persistence of waterholes.

Proposed timeframes for the application and assessment process

Perusal period and application window

The department proposes to release the water in late December 2026. Potential applicants will have about six weeks to consider the Terms of Sale, with applications opening mid-January 2027 and closing in May 2027. The timetable provides roughly four months of open applications. The perusal period falls almost entirely within the Christmas and New Year period.

The period between release and closing may need to accommodate a watercourse determination (three months or more based on the department's factsheet), a decision on which product and sub-area to apply for, a storage or pump design sufficient to estimate cost, financial approval, and contact with the State Assessment and Referral Agency and Council. Few of these steps can begin in earnest until the Terms of Sale, particularly the price and licence conditions, are known.

We recommend that (i) the department publish the Terms of Sale, including the price for each product and assessment criteria. as soon as possible, and in any case before the Christmas period, and (ii) the application period close no earlier than 30 June 2027.

Order of assessment

The department proposes to assess applications in the order in which they are received for each water product. We are strongly opposed to this approach. A first-come, first-served rule will reward the applicants who are already prepared or who already hold entitlements or works. It will work against those who are new to the system and who need the full application period to prepare a sound application.

More fundamentally, the State's approach to releasing a limited public resource should not have applicants behaving like customers queuing for concert tickets. Water should be released where it will deliver the greatest benefit to the community, the region and the State, and that will not be achieved by granting water to whoever is first to lodge. This is even more the case when the department's own estimate of known demand (400,000 ML) far exceeds the 130,000 ML available.

Assessing applications in the order received appears to be an easy way of avoiding the difficult but important task of evaluating competing proposals and deciding which represent the best use of the water. That task is the department's responsibility in releasing a public resource, and it should not be avoided.

We recommend that all applications lodged within the application period be treated as received on the closing date. Where demand for a product in a sub-area exceeds the volume available, applications should be assessed on merit against published criteria. The criteria should focus on the benefit of the proposed use to the community, the region and the State. Timeliness, including the applicant's capacity to install works and begin using the water within a defined period, could be one of the criteria. This would retain the main advantage of an order-of-receipt approach, which is to favour applicants who are ready to proceed, without making the date of lodgement decisive.

Proposed payment options

The department proposes two options: full payment up front where works are already installed, or a non-refundable 25 per cent deposit within 30 business days, with the balance payable when works are installed. We support the principle of a staged payment for applicants without works. For many of the applicants we have been working with, option 2 will be the only practical option, and its terms will determine whether the release is taken up.

We also recommend that the deposit be refundable where approvals are refused. A purchaser who pays the deposit in good faith may find that a storage cannot be approved, for example because a watercourse determination changes the applicable product or a waterway barrier approval is refused. These outcomes are outside the applicant's control and are difficult to assess before the licence is granted. A refund should be available in such circumstances.

Proposed water products

Volumes offered in the Belyando headwaters

The department has advised that 130,000 ML is available in Subcatchment E and that known demand across the basin exceeds 400,000 ML. We understand that of this, 25,000 ML will be allocated to sub-areas 1 to 3 and 10,000 ML to sub-area 4, with the low-flow product limited to 5,000 ML across sub-areas 1 to 3 and 500 ML in sub-area 4. We understand that the split between sub-areas was designed to reflect the expressions of interest received. We ask the department to confirm whether the sub-area totals are fixed or whether volume not taken up in one sub-area can be reallocated to a sub-area where applications exceed the offered volume. Our strong preference is for a mechanism that allows reallocation, so that water is not left in the reserve while eligible local applications are refused.

Days of opportunity and the hydrology behind the flow conditions

The presentation describes each product by its passing flow threshold but gives no information on how often those thresholds are met. Without that information applicants cannot size a storage, estimate a reliable volume or determine value for money.

We recommend that the department publish, for each sub-area and each threshold, the average and distribution of days per year on which the threshold is exceeded, and the proportion of years in which the full annual volume could be taken under the rate and flow conditions.

Measurement and compliance at closed gauging stations
The high-flow passing flow condition in sub-area 4 is referenced to Mistake Creek at Charlton (station 120306A), which the presentation and the department's sub-area map both show as closed. The condition for take downstream of Charlton refers to station 'GSA120305A', also described as closed, but the map shows station 120305A as open and located near Alpha in sub-area 1. We ask the department to confirm which gauging stations the flow conditions in sub-areas 1 to 4 refer to, and to explain how the conditions will be measured where a station is closed.

Overland flow product
The overland flow product is described as an equivalent nominal entitlement for a storage larger than 1,000 ML, with the department to provide storage size and catchment area relationships. These relationships, and the method for converting a storage size to a nominal volume and a price, are needed before applicants can consider this product. We ask that they be published with the Terms of Sale.

The department has also flagged that the plan review may allow up to 1,000 ML of overland flow to be taken without an entitlement. The Terms of Sale should explain how this proposal interacts with a purchased overland flow entitlement: whether a purchaser's licensed volume is in addition to the volume that can be taken without a licence, and whether a landholder who buys an overland flow entitlement in 2027 would have been able to build the same storage without one after the new plan commences. Purchasers should not be disadvantaged by a plan change that the department has already foreshadowed.

Multiple applications and trading
The Terms of Sale should confirm whether an applicant may apply for more than one parcel or for more than one product, and whether applications by related entities will be treated as one. We also ask the department to confirm that licences will be able to be relocated within a sub-area if the preferred site changes during design, and that they will be tradeable, consistent with the department's intention to better enable trading through a targeted plan amendment.

Existing users
We support the protection of existing water users, including town water supplies and stock and domestic waterholes in the headwaters. We ask the department to confirm that Barcaldine Regional Council has been consulted on any Council entitlements or infrastructure in sub-areas 1 to 4, and that the passing flow conditions have been tested against the persistence of waterholes on which existing grazing enterprises depend.

Information and support before applications open
We ask that a face-to-face session be held at Alpha, or alternatively Jericho, before applications open in January 2027. RAPAD can host the session, assist with invitations and arrange for Barcaldine Regional Council to attend.

We also recommend that the department:
- provide a plain-English guide to the release and a worked example application
- set proportionate application requirements for small applications
- prioritise watercourse determination requests from Subcatchment E, and

- publish the sub-area boundaries as a spatial layer and confirm them in Queensland Globe.

Thank you for the opportunity to comment and for the engagement to date. We would welcome a discussion of this submission. Please direct any questions to Morgan Gronold, Chief Executive Officer, on 0448 739 759 or mgronold@rapad.com.au.

Regards



Morgan Gronold
Chief Executive Officer
Central Western Queensland Remote Area Planning and Development Board