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HANCOCK
AGRICULTURE

Submission on the Consultation Draft Fitzroy–Derby Water Resources Management Plan: Policy and Guidance (April 2026)

Fossil Downs, Liveringa and Roebuck Silage and Hay, welcome the opportunity to provide a submission on the consultation draft *Fitzroy–Derby Water Resources Management Plan: Policy and Guidance* (the draft Plan).

We are long-term pastoral landholders and water users in the Plan area, with operations at Liveringa, Fossil Downs and more recently, Roebuck Silage and Hay, who are deeply affected during droughts, as are our cattle, who die if insufficient water and feed.

Hancock supports the development of a water resources management plan for the Fitzroy–Derby area that both safeguards the catchment’s environmental, cultural and heritage values and supports economic development to grow jobs in the region for all residents.

We recognise that Traditional Owners have significant interests in land and water resources and are potential beneficiaries in developing water assets and the downstream development that can occur. We have long held the view that economic development is the path to Indigenous economic independence from government, self-esteem and self-responsibility, and provide better opportunities for families and children.

We have a long history of working with Traditional Owners, helping them with many day to day requirements, in good faith, and we remain committed to engaging constructively with the Department, Traditional Owners and regional interests in the responsible use of overflow water in the region.

Given the consultation timeframe, this submission sets out our position, together with Hancock Agriculture’s, at the level of principle. We intend to provide more detailed input through the Department’s continued engagement with industry. We would welcome the opportunity to meet with the Department, and we respectfully reserve the right to make a further and more detailed practical submission.

This submission focuses on the matters of most immediate relevance to our operations and does not address every provision of the draft Plan. Our decision not to comment on a particular provision should not be taken as agreement with it, and we reserve our position on all aspects of the draft Plan, including in connection with the assessment of existing and future licence applications.

- **Sustainable economic development.** We support the draft Plan's recognition that protecting the river's values and supporting economic development can be pursued together, a position that was recorded after extensive work some years ago, by the CSIRO.

Pastoral and agricultural operations are long-established in the catchment and are an important part of the regional economy and of regional and Aboriginal employment. We encourage the Department to ensure the final Plan gives practical effect to its economic development objective and stock welfare, alongside its environmental or other objectives.

Regional beef-processing capacity near Derby is being recommissioned after an extended closure, and its viability depends on a reliable, year-round local cattle supply, which depends in turn on the capacity to produce irrigated fodder required to feed the stock, including through drought or flood annual conditions.

Major regional fodder sources have been lost in recent years, and southern and interstate supply is constrained by freight cost and biosecurity requirements, so local fodder production matters increasingly to the wellness indeed life of cattle, processing, live-export and pastoral sectors.

Constraining the water available for that production limits the employment, Aboriginal economic participation and supply-chain investment which the Plan's economic-development objective is meant to support, and would ignore the welfare of many thousands of stock.

Not having sufficient feed or water for stock, is unnecessarily cruel, when trapping a portion of the overflow water can save this from happening.

For those not familiar with the region firsthand, when the Fitzroy floods, the river can extend in parts to 50 kilometres wide across, with massive amounts of water flowing into the ocean. A portion of this overflow could save cattle's lives, and provide much needed employment, and stable employment.

- **Alignment with State and Commonwealth development policy.** The draft Plan should be read alongside the Government's own objectives for the region, including the Kimberley Regional Investment Blueprint and the Commonwealth's White Paper on Developing Northern Australia, which identify agriculture, infrastructure and Aboriginal economic participation as development priorities.

A framework that forecloses the water resource on which those objectives depend is difficult to reconcile with them. We encourage the Department to ensure the final Plan is consistent with, and gives practical effect to, those strategies.

- **A clear, certain and workable licensing pathway.** We support a clear, evidence-based framework for allocation. For that framework to enable the sustainable development the Plan contemplates, existing and prospective users need a reasonably certain basis on which to plan and invest responsibly.

We encourage the Department to ensure that the criteria and indicative timeframes for assessing applications, and for assessing any subsequent stages of a development, are as transparent and predictable as possible. The criteria for what constitutes an acceptable impact under local licensing policy 1.1 should be transparent, measurable and consistently applied, so that proponents can assess viability with confidence and comparable applications are assessed consistently.

The hydrogeological assessment requirements under local licensing policies 2.3 to 2.6 fall most heavily on applicants in areas where baseline data is limited. We ask the Department to provide proportionate assessment pathways for smaller developments, access to government-held hydrogeological data and modelling, and support for the baseline studies on which sound decisions depend.

- **Calibrating the single-application volume threshold.** Hancock acknowledges the Department's interest in an incremental approach that allows abstraction and its effects to be assessed as a project proceeds.

We are concerned, however, that a fixed limit on the volume granted in a single application, such as the indicative 3 gigalitre threshold in policy 3.4 risks undermining the necessity for water in all years, it being impossible to plan how much rain will fall each year, and if insufficient water is permitted for cattle, other stock and feed, cattle and other stock will unnecessarily and cruelly die. Investment is desperately needed in the region, investment certainty is required for capital-intensive development.

Consistent with our and many other pastoralists' views, water planning rules should be tied to need, recognising the different annual rainfalls and drought or flood conditions. Rather than set at arbitrary levels, we encourage the Department to calibrate any single-application threshold to be varied to allow this to be taken into consideration, so that where overflow water from natural flooding can demonstrate a larger initial volume can be made available the framework does not unnecessarily constrain responsible development. We would welcome the opportunity to develop this further through continued engagement.

- **A staged licensing mechanism that preserves investment certainty.** Where the Department retains an incremental approach, we encourage it to adopt a mechanism that keeps the discipline of staged development while giving proponents certainty over the full project.

Under this model the Department would assess a development's full long-term water requirement at the outset and approve it in pre-defined increments, released as the proponent meets agreed development milestones, performance criteria and compliance requirements, subject to periodic review.

Water would be accessed only as development proceeds, while capital-intensive projects could be planned and financed with confidence. This requires no reduction in environmental safeguards or community protections.

- **Transparent and adaptively reviewed allocation limits.** We support allocation limits that are grounded in the best available evidence and that can be reviewed and adjusted as monitoring and hydrogeological understanding improve. We encourage the Department to publish the basis and key assumptions for the groundwater allocation limits, and to commit to their periodic review over the life of the Plan.
- **Access to high-flow surplus water.** Hancock does not accept that a framework confined to groundwater represents an appropriate long-term basis for water management in the catchment.

During major wet-season events, flows in the river system far exceed the volumes required to sustain its environmental and cultural values, and much of that surplus passes to the sea, lost to evaporation and downstream flooding.

Hancock recognises the values the Plan seeks to protect, and the importance of maintaining flows within their natural range. Because that surplus can be accessed without compromising those values, we press for the final Plan to provide a transparent, capped and monitored mechanism for access to a defined portion of high-flow surplus water (taken only when flows demonstrably exceed established environmental and cultural flow requirements) for productive use, managed aquifer recharge and landscape rehydration.

A groundwater-only framework confines the catchment's development to a fraction of the water that the best available science indicates can be taken without compromising the river's values, and Hancock does not regard that outcome as consistent with the Plan's economic-development objective. Hancock reserves its position on this matter and will develop it, with supporting evidence, through the Department's continued engagement with industry.

- **Certainty for existing lawful users.** Hancock holds existing lawful water entitlements in the plan area. We ask that the final Plan recognise existing lawful entitlements and provide a clear and predictable basis for the assessment of licence renewals, consistent with established licence conditions and operating arrangements.
- **The Fitzroy–Derby Aboriginal Water Holding.** Hancock notes the proposed establishment of the Fitzroy–Derby Aboriginal Water Holding. We recognise the importance of Aboriginal economic aspirations in relation to water, consistent with our long experience of working with Traditional Owners across our operations. To allow the framework to be properly understood and engaged with, we encourage the Department to provide as much clarity as possible on the governance and access arrangements for the Holding.
- **Water Advisory Committee.** We support the proposed Water Advisory Committee as a mechanism for the long-term involvement of stakeholders in water planning and management, and we ask that its membership include several representations from the pastoral and agricultural industry and that of the independent business community so we can seek to collectively work to protect and develop the water opportunities in the Kimberleys.

Hancock supports the development of the draft Plan and looks forward to continuing to work with the Department, Traditional Owners and the community as the Plan is finalised and implemented.

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Yours faithfully

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