



Draft Reef 2050 Catchment Water Quality Strategy **November 2025**

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Department of Environment, Tourism, Science and Innovation

Contents page

About the Queensland Farmers' Federation	2
Submission.....	2
Introduction.....	2
Feedback on the draft strategy	3
Priority recommendations for the draft strategy	4
Conclusion.....	4

This submission is provided to:

Office of the Great Barrier Reef
Department of Environment, Tourism, Science and Innovation
Brisbane QLD 4000

Submitted via email at officeofthegbr@detsi.qld.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- Canegrowers
- Greenlife Industry QLD
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallawa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

About the Queensland Farmers' Federation

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.

Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

Submission

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide feedback on the Draft Reef 2050 Catchment Water Quality Strategy.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

Introduction

QFF appreciates the constructive engagement undertaken to date and support the move toward a values-based, whole-of-catchment, integrated approach. In particular, we endorse the draft's emphasis on shared responsibility, stewardship and collaboration. These principles, if backed by clear actions and accountability, can strengthen trust, build shared ownership of outcomes and reinforce long-standing partnerships that are essential to achieving water quality improvements.

Additionally, we endorse the four focus areas highlighted in the strategy – enhancing environmental stewardship, building healthier landscapes, building capacity, and generating/sharing knowledge – as being critical to the basis for achieving targets set.

However, values-based frameworks must be supported by practical detail to translate ambition into measurable progress. While the draft sets an encouraging direction, the strategy cannot be delivered in its current form. It requires substantial refinement, particularly an implementation plan, clear accountability, and stronger alignment with existing systems, to ensure confidence across sectors and maintain hard-won momentum.

As drafted, it does not yet provide the level of specificity or operational clarity needed to give stakeholders, including those who have already invested heavily in practice change and continuous improvement, certainty that the strategy can be effectively delivered. QFF offers the following feedback to ensure the final strategy is both credible and actionable.

Feedback on the draft strategy

1. The draft strategy does not adequately recognise two decades of progress

Agriculture, landholders, regional NRM bodies and local governments have made significant long-term contributions to improving water quality, supported by substantial investment, practice change and collaborative partnerships. The draft does not sufficiently acknowledge these achievements, nor does it clearly connect to the extensive established frameworks, science programs and delivery systems that have underpinned progress over the past two decades.

2. The draft lacks the operational clarity needed for implementation

While the draft presents a compelling narrative, it remains overly broad, aspirational and high-level. In places it reads more like promotional material than a functional strategy and it does not define roles, responsibilities, costings, timeframes or pathways for coordination across sectors. Without these components, it will be difficult for stakeholders to meaningfully partner in delivery or to understand what the strategy requires of them.

Furthermore, it additionally lacks references to mutual benefits of stewardship to landholders and environment, missing the crucial aspect of profitability resulting from best practice. It also overlooks responsibility/management of government managed land/assets, and frameworks for engagement with government agencies responsible for managing land in the GBR catchments.

3. Insufficient specificity risks undermining collaboration

Ambiguity within the draft risks undermining the collaboration it seeks to promote. The lack of specificity makes it difficult for industry, local governments, Traditional Owners and community organisations to understand how the strategy will be operationalised, how responsibilities will be shared and how progress will be monitored. This uncertainty may slow progress, reduce engagement or erode confidence among sectors that have historically collaborated effectively.

4. Metrics and accountability mechanisms are inadequate

Although the draft includes high-level targets, it lacks clear explanation of how these will be achieved, what interim indicators will be used, who will be accountable, and how performance will be monitored or enforced. For example, how is the protection of 99% of aquatic species going to be monitored to reduce pollution at the end of catchment? Furthermore, indicators such as “positive sentiment” among farmers are too vague to be meaningful. A strategy of this significance requires a strong, well-resourced monitoring, evaluation, reporting and improvement (MERI) framework with defined accountability.

5. Key delivery partners are underrepresented

The draft grossly underrepresents the breadth of partners involved in water quality improvement. Agricultural industries, landholders, regional NRM organisations and local governments are central to existing delivery efforts but are minimally reflected in the strategy’s examples, initiatives and engagement pathways. The limited reference to proven programs and

successful delivery models weakens the sense of continuity and risks overlooking critical expertise. Clarifying how the strategy builds on this body of work will improve legitimacy and buy-in.

6. The absence of an implementation plan is the most critical gap

The absence of an implementation plan is a major gap and reduces confidence that the strategy's objectives can be delivered. There are no clear actions, sequencing, costings or investment pathways. Without an implementation plan, the strategy lacks credibility and cannot be operationalised.

Priority recommendations

To strengthen the strategy, QFF recommends:

1. Explicitly identify and acknowledge the achievements and investments already made by agriculture, NRM groups and local government.
2. Release a detailed, costed implementation plan alongside the final strategy, including actions, partners, timeframes, governance and reporting.
3. Strengthen metrics and accountability, replacing vague indicators with measurable, science-based targets.
4. Undertake a review of the Paddock to Reef program and its tools, including whether industry supports its continuation and how the tool can be improved.
5. Embed proven programs and delivery models, retaining alignment with regional NRM planning and existing partnerships.
6. Ensure genuine co-design with primary producers, Traditional Owners, industry bodies, local government agencies, and regional organisations.
7. Clarify the strategy's relationship to existing frameworks, particularly the Reef 2050 Plan and regulatory settings, and use data from stewardship programs (such as Hort360 Reef Certification, in Horticulture, and) to inform decision making for capacity building for water quality improvement.
8. Ensure that all primary industries are included in the term 'Agriculture' which is very broad, consider including Agriculture in the glossary to confirm the industries of interest (grazing, horticulture, bananas, sugarcane)

Conclusion

QFF supports the intent to move toward a values-based, integrated catchment management approach. However, the draft strategy cannot be delivered in its current form. It requires substantial refinement, particularly an implementation plan, clear accountability, and stronger alignment with existing systems, to ensure confidence across sectors and maintain hard-won momentum.

QFF looks forward to ongoing engagement with the Office of the Great Barrier Reef and to working collectively toward a robust and effective strategy that supports healthy catchments, a resilient Reef and strong regional communities.

Yours sincerely

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