



QUEENSLAND
FARMERS'
FEDERATION



**Draft Gold Coast Water Plan
December 2025**

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Prepared for:
Department of Local Government, Water and Volunteering

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This submission is provided to:

Department of Local Government, Water and Volunteers

Submitted via email at GoldCoastWP@dlgwv.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 comment on the Draft Gold Coast Water Plan. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Executive Summary

The Draft Gold Coast Water Plan introduces significant changes to the way water is managed across the region, with major implications for agricultural users. The most consequential reforms for agriculture relate to the regulation of groundwater, the allocation of unallocated water predominantly to urban supply, strengthened environmental flow rules, modernised volumetric licensing, and an expanded framework for water trading. Together, these measures reflect the State's increasing focus on environmental protection and aquifer sustainability; however, they also present new challenges for agricultural enterprises that depend on secure and affordable access to water.

Restrictions on new groundwater take through the introduction of Underground Water Management Areas, the limited prospects for securing new allocations, and the transition to more prescriptive volumetric arrangements all have direct implications for farm productivity, business expansion and long-term viability. These reforms risk compromising the reliability of existing entitlements and the capacity of water-dependent industries to respond to emerging market demands.

Of particular note is the impact on the region's nursery sector, which contributes an estimated \$78 million to the agricultural economy and is expected to face rapidly increasing demand in the lead-up to the 2032 Brisbane Olympic and Paralympic Games. Large-scale landscaping, revegetation and green infrastructure projects associated with the Games will require significant production capacity, yet the draft plan provides no clear pathway for securing new agricultural water allocations to support this scaling. Without reliable access to water, nurseries may be constrained in their ability to meet state and national supply chain requirements during this critical period.

QFF acknowledges the intent behind the proposed reforms, particularly the objectives relating to environmental outcomes, groundwater protection and long-term resource sustainability.

However, it is essential that the final plan remains practical, equitable and responsive to the needs of primary producers. Ensuring that agriculture, specifically strategic growth industries such as nurseries, has the water security required to maintain productivity and expand where necessary will be critical to the economic resilience of the Gold Coast region and Queensland more broadly.

Introduction

This statutory review represents the first substantive reform of the plan since 2006 and coincides with a period of substantial pressure on the region's agricultural sector.

Agriculture within the Gold Coast Water Plan area includes nurseries, dairy, horticulture and cane production contributing an estimated \$86 million to the economy in 2025, underscoring the importance of reliable and equitable access to water for ongoing productivity and regional prosperity.

Producers in the region depend on a combination of surface water, groundwater and small on-farm storages to maintain productivity in what is a climatically variable and increasingly urbanised landscape. The catchments within the plan are small and hydrologically sensitive, with many farmers relying on legacy licences, opportunistic flow events or groundwater sources that typically respond quickly to seasonal conditions. As a result, any adjustments to water access rules, environmental flow requirements or groundwater management frameworks can have a significant operational and economic implications for agricultural businesses.

This submission outlines the key changes in the draft plan and their expected impacts on agriculture across the Gold Coast plan area.

Inclusion of Underground Water Management Areas

A central reform in the draft plan is the introduction of Underground Water Management Areas, which bring groundwater use under a more structured regulatory framework. In these designated zones, new groundwater extraction is limited or prohibited unless it meets specified criteria. QFF acknowledges this reform responds to emerging concerns about the sustainability of hinterland aquifers, recharge variability and the protection of groundwater-dependent ecosystems.

QFF recognises the rationale for introducing the Underground Water Management Area, noting that the measure responds to growing concerns about the sustainability of hinterland aquifers and the need to better manage unregulated groundwater take, including the commercial extraction of spring water by a small number of landowners prior to 2020. These aquifers support ecologically sensitive springs, baseflows and local communities, and the establishment of a formal management framework provides the State with clearer tools to assess, monitor and regulate groundwater use to ensure long-term system health.

While the intent of this reform is acknowledged, its practical effect presents a significant tightening of access for agricultural water users who rely on bores for irrigation, frost protection and household water supply. Although existing entitlements may continue, opportunities for securing additional groundwater to support business growth will be considerably constrained.

QFF encourages the Department to establish a clear, science-based pathway for future reassessment to avoid unnecessarily restricting genuine agricultural development.

Allocation of Unallocated Water to Urban Strategic Supply

The draft plan creates an unallocated water reserve however, nearly the entire volume is assigned to the Nerang strategic reserve for future urban supply. This provision represents a material shift in water availability for non-urban users and significantly reduces the opportunity for agricultural enterprises to secure new allocations.

In a region experiencing rapid population growth and strong competition for land and resources, the exclusion of agriculture from meaningful access to unallocated water restricts flexibility and inhibits future investment in irrigated agriculture.

QFF acknowledges the imperative of ensuring long-term urban water security but considers it essential that a portion of unallocated water be reserved for agricultural growth and innovation. This is particularly important for the region's nursery sector which contributes an estimated \$78 million to the region's agricultural economic contributions and is now facing unprecedented scale up production demand in the lead up to the 2032 Brisbane Olympic and Paralympic Games.

Large-scale landscaping, revegetation, public space upgrades and green infrastructure projects associated with the Games will require significant volumes of plant stock. To meet these market demands, nurseries will need secure access to water to scale production, expand growing capacity and maintain plant quality. Supporting the nursery sector to respond to emerging opportunities is critical for both the region's economic resilience and Queensland's broader supply chain.

Horticulture and dairy production in this region are a significant contributor to our own food security, and it is essential that the future of this production is prioritised in the water plan. Water security is critical in underpinning the future maintenance and growth opportunities for both dairy and horticulture, and must be considered in the allocation of unallocated water deliberations.

Updating Licensing Framework and Volumetric Requirements

The plan modernises the licensing structure by transitioning older area-based and riparian licences into volumetric allocations with defined maximum extraction rates. While this change improves administrative clarity and supports a more consistent regulatory framework, it also introduces risk where default volumetric conversions do not align with actual agricultural requirements.

Many intensive farming production operations such as nurseries, dairy farms and irrigated horticulture regularly require water volumes exceeding the assumption used in the draft plan. If volumetric allocations are not calibrated using accurate metering data and commodity specific demand profiles, producers may face shortfalls that compromise productivity and business viability. The successful implementation of this reform will require careful adjustment of conversion factors, coupled with strong communication across the region with adequate access to transitional support and appeal provisions.

Environmental Flow Objectives

The draft plan introduces revised Environmental Flow Objectives designed to protect river health, maintain ecosystem function and ensure the long-term sustainability of the regions water ways. These objectives introduce explicit thresholds that may trigger significant reduction in water extraction during dry or low-flow periods.

For agricultural users operating on small tributaries or sensitive water ways, these flow requirements may result in more frequent access limitations. QFF supports the intent of improving environmental outcomes but emphasises the importance of practical, transparent implementation. Access rules must be clearly defined and supported by reliable monitoring information, applied consistently to avoid unintended impacts on food and foliage producing industries.

Expansion of Water Trading and Seasonal Water Assignments

The plan expands provisions for water trading and Seasonal Water Assignments allowing water to move more flexibly between users and the catchment. This mechanism can be valuable in helping growers to manage seasonal variability or short-term shortages during dry periods.

QFF notes that increased trading activity in highly constrained systems may heighten competition for limited water resources and lead to upward price pressure during dry periods. QFF supports trading frameworks where they enhance system efficiency but notes that appropriate safeguards are required to protect the reliability of supply for long-standing rural water users.

Clarification of Riparian Use and Overland Flow

The draft plan provides clarification to the rules for taking water directly from watercourses and provides a more defined approach to the management of overland flow. These updates aim to improve transparency, reduce inadvertent non-compliance and address the growth in riparian use observed since the previous plan.

For producers who rely on opportunistic capture or long-standing historical arrangements, these changes may require operational adjustments. Any future consideration of regulating overland flow must be approached cautiously, as many farms depend on small storages to support production and resilience in variable climatic conditions.

Enhanced Emphasis on Cultural and Environmental Values

The draft plan elevates the importance of cultural and environmental values in decision-making processes. Traditional Owner interests, groundwater-dependent ecosystems and key environmental assets are given stronger recognition, reflecting contemporary expectations for water management.

While QFF supports the inclusion of these values, it emphasises that balanced and transparent decision-making processes will be essential to ensure agricultural users retain secure, equitable access to water alongside these broader considerations.

Monitoring, Reporting and Implementation Pathways

The draft plan indicates that many operational elements will be set out in the Water Management Protocol. While this allows for adaptive management, it also increases the need for transparency and regular stakeholder engagement. Annual reporting on environmental flows, groundwater levels, allocation reliability and trading activity will be essential to maintaining user confidence and ensuring the plan functions as intended.

Conclusion

The Draft Water Plan (Gold Coast) 2025 marks a significant shift in how water resources will be regulated across the region, introducing measures designed to strengthen environmental protections, sustainably manage groundwater systems and provide long-term security for urban water supply. However, these reforms also impose new constraints on agricultural businesses that rely on dependable water access to maintain productivity, competitiveness and industry growth.

As agriculture in the Gold Coast plan area contributes meaningfully to regional prosperity, including an estimated \$78 million from the nursery sector alone, care must be taken to ensure the plan supports industries that underpin both local employment and Queensland's broader economic objectives. This is especially important in the lead-up to the 2032 Brisbane Olympic and Paralympic Games, where nursery producers will be called upon to meet substantial increases in demand for plant stock and green infrastructure materials. Ensuring these producers have access to secure water supplies will be critical for enabling them to scale and contribute to state and regional development priorities.

Cane, dairy and horticulture production also make up these important contributors to the regional and state economy and to the food security of Queenslanders. It is essential that each commodity grown in the region is well understood and the water security, accessibility and affordability requirements of each prioritised under this plan.

QFF values the intent of the proposed reforms but stresses the importance of balanced, evidence-based implementation that protects environmental outcomes while maintaining the viability of the region's agricultural industries.

QFF welcomes ongoing engagement with the Department of Local Government, Water and Volunteers to refine the final plan in a way that supports sustainable water management and long-term resilience across the agricultural sector.

Yours sincerely

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