



QUEENSLAND
FARMERS'
FEDERATION



Logan Basin Draft Water Plan **April 2026**

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Department of Local Government, Water and Volunteers

Contents page

About the Queensland Farmers' Federation.....	2
Submission	2
Executive Summary.....	2
Groundwater Management – Flexibility in Application	3
Volumetric Entitlements – Pathways for Adjustment	3
Seasonal Water Assignments and Water Trading	4
Protection of Existing Entitlements.....	4
Water Security and Reliability.....	5
Water Licence Amendments – Clarity and Communication	5
Conclusion.....	5

This submission is provided to:

Department of Local Government, Water and Volunteers
Chief Executive
Water Planning and Science South Region
Attention: Senior Policy Officer

Submitted via email GoldCoastWP@rdmw.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
- Mallowa 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

Executive Summary

The Queensland Farmers' Federation (QFF) welcomes the opportunity to provide final feedback on the Logan Basin Water Plan prior to its adoption.

QFF represents a diverse range of agricultural industries within the Logan Basin, including dairy, horticulture, turf, and plant and nursery production, as well as intensive livestock industries, all of which rely on secure, reliable and accessible water to sustain productivity, support regional economies, and underpin long-term investment.

At this final stage, QFF's focus is on ensuring the plan delivers confidence, flexibility and practical application for water users. These outcomes are critical not only for regional productivity, but also for supporting food security and the ongoing supply of fresh, locally grown produce.

This submission draws attention to key elements that will be critical to the effective operation and uptake of the plan.

In particular, QFF highlights the importance of:

- Applying groundwater management provisions in a flexible, evidence-based manner, including targeted restrictions on commercial extraction that do not impact genuine agricultural use
- Ensuring volumetric entitlement settings, including the 6 ML per hectare baseline, operate as a baseline rather than a strict cap, with practical pathways for adjustment where justified
- Introducing seasonal water assignments and broader water trading arrangements in a way that is accessible, efficient and fit-for-purpose
- Maintaining the security and integrity of existing entitlements
- Reinforcing confidence in water security and reliability

Attention to these elements will support a plan that delivers both sustainable and productive outcomes across the Logan Basin.

Groundwater Management – Flexibility in Application

QFF recognises the importance of groundwater management settings in maintaining the long-term sustainability of the resource and supports measures that ensure groundwater extraction remains appropriately managed.

The introduction of measures to restrict commercial groundwater extraction is acknowledged as an important step in protecting the resource. It is important, however, that these measures do not inadvertently impact genuine agricultural groundwater access and use, which underpins business continuity and long-term investment.

Agricultural production systems vary significantly, and groundwater settings should reflect these differences. In this context, attention is drawn to:

- Clearly targeted restrictions on commercial extraction, avoiding unintended impacts on agricultural users
- Recognition and protection of existing agricultural groundwater entitlements
- The capacity for site-specific, evidence-based application where sustainable

This approach will support both resource sustainability and productive use.

Volumetric Entitlements – Pathways for Adjustment

QFF understands that the plan introduces or maintains volumetric frameworks, including area-based limits such as 6 ML per hectare.

While this provides a consistent baseline, a uniform setting will not reflect all production systems. There will be circumstances where the 6 ML per hectare limit does not align with demonstrated production requirements or efficient water use outcomes.

Attention is drawn to the importance of:

- Ensuring the 6 ML per hectare setting operates as a baseline rather than a fixed cap
- Maintaining clear and practical pathways for entitlement adjustments
- Allowing consideration of crop type, production intensity, water use efficiency, and local conditions

A framework that enables case-by-case consideration will better support sustainable and productive outcomes.

Seasonal Water Assignments and Water Trading

QFF acknowledges the introduction of seasonal water assignment arrangements and broader updates to water trading within the Logan Basin.

These changes represent a positive step toward improving flexibility, transparency and efficiency in water use. Seasonal assignments, in particular, provide an important mechanism for managing variability and supporting the movement of water to its highest value use.

The effectiveness of these arrangements will depend on how they operate in practice. Attention is drawn to the importance of:

- Processes that are simple, timely and cost-effective
- Administrative and compliance requirements that are proportionate and do not create unnecessary barriers
- Clear guidance to support user understanding and participation
- Integration of seasonal assignments within the broader trading framework in a way that supports practical operation

Well-functioning trading arrangements will be critical to enabling operational flexibility and efficient water use across the basin.

Protection of Existing Entitlements

QFF places strong emphasis on maintaining the integrity and security of existing water entitlements.

Across all sectors, existing allocations underpin business continuity, infrastructure investment and long-term planning. Confidence in these settings is essential.

Within the Logan Basin, increasing and unprecedented urban development is placing additional demand on water resources, creating a more complex operating environment for existing entitlement holders. In this context, it is important that the balance between competing water uses is carefully managed.

Attention is drawn to the importance of:

- Maintaining the security of existing entitlements without erosion over time
- Avoiding any reduction in reliability or access under current licences
- Ensuring existing users are not disadvantaged by shifting demand or future policy settings arising from urban growth

Providing this certainty will be critical to sustaining confidence across the basin and ensuring that agricultural water use continues to support regional productivity and food supply.

Water Security and Reliability

Confidence in water security and reliability remains fundamental to all agricultural production systems.

The plan should reinforce clear and predictable access to water, enabling producers to make informed decisions across both seasonal and long-term timeframes. For intensive industries, reliability directly impacts operational viability, while for horticulture, turf, and plant and nursery production, consistency of supply is essential to maintaining product quality, meeting market demand, and sustaining supply chains.

Ensuring these outcomes are clearly reinforced will be critical to the plan's success.

Water Licence Amendments – Clarity and Communication

QFF acknowledges that implementation of the plan may result in amendments to existing water licences.

Clear and practical communication will be important to ensure entitlement holders understand how changes apply and can continue to operate with confidence.

QFF supports the development of targeted educational and guidance materials to accompany implementation. While existing resources provide a useful foundation, additional tailored materials may be required to support water users through the transition.

Conclusion

QFF acknowledges the significant work undertaken to progress the Logan Basin Water Plan to this final stage.

Ensuring flexibility in groundwater and entitlement settings, practical and accessible trading arrangements, and continued confidence in water security and reliability will support a plan that is both sustainable and effective in practice.

These outcomes are also critical to supporting regional productivity, food security, and the ongoing supply of high-value agricultural products, including horticulture, turf, plant and nursery production, and intensive livestock industries across the basin.

Yours sincerely

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