



QUEENSLAND
FARMERS'
FEDERATION



Murray Darling Basin Plan Review May 2026

Prepared by
Jo Sheppard, CEO, QFF
E: qfarmers@qff.org.au

Prepared for:
Murray Darling Basin Authority

Contents page

About the Queensland Farmers' Federation	2
Submission.....	2
Executive Summary.....	2
Sustainable Diversion Limits (SDLs).....	3
Environmental Water Recovery	3
Rules-Based Approaches and Connectivity.....	4
Socio-Economic Impacts	4
Complementary Environmental Measures	5
Invasive Species Management.....	5
Indigenous and Cultural Water	5
Conclusion	6
QFF recommendations:.....	6

This submission is provided to:

Murray Darling Basin Authority
Basin Plan Review Submissions
GPO Box 1801
CANBERRA CITY ACT 2601
Submitted via email BPRSubmissions@mdba.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

QFF welcomes the opportunity to provide comment on the Murray Darling Basin Plan Review.

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

Executive Summary

Queensland's agricultural producers and the regional communities of the Northern Basin have played a central role in delivering the Murray Darling Basin Plan, contributing meaningfully to water recovery and supporting the transition to a more sustainable Basin system. As water, land and soil stewards, these communities recognise the immense value of a health Basin ecosystem, both above and below the surface and the critical role it plays in sustaining agricultural productivity, regional communities, and environmental outcomes over the long term.

Over time, these adjustments have driven greater water use efficiency, improved alignment between water availability and production decisions, and supported the establishment of a functioning and mature water market. Importantly, they have enabled the delivery of environmental water at scale while maintaining a productive agricultural base across the Basin.

This outcome has not been neutral. It has been delivered through the reallocation of water from existing landholders, effectively positioning Queensland's agricultural producers and the regional communities of the Northern Basin as the primary mechanism for achieving recovery.

While this approach reflected the most readily available pathway in the early stages of the Plan, it is not a sustainable model for ongoing reform. The Basin has now moved beyond just adding more water. Future policy must shift toward system optimisation, rather than continuing to draw from the same source.

These reforms are now translating into measurable improvements in Basin health. With this progress now established, the next phase of the Plan should focus on optimising outcomes from the existing settings, rather than extending the recovery task. This requires maintaining core settings such as Sustainable Diversion Limits, protecting entitlement reliability, and prioritising system efficiency and complementary environmental measures.

Sustainable Diversion Limits (SDLs)

Sustainable Diversion Limits represent a central compromise of the Basin Plan, balancing environmental needs with the continuation of productive water use. For Queensland's agricultural producers and Northern Basin communities, SDLs underpin future planning certainty, on-farm investment confidence, and the long-term viability of agricultural enterprises, as well the communities dependent on local agricultural production that enable regional economic activity and long-term prosperity.

Importantly, the current SDL settings have been established through extensive scientific assessment and policy development and are now demonstrating that they are sufficient to meet the environmental sustainability objectives of the Basin Plan. This is reflected in improving environmental indicators and system response across key Basin assets.

In this context, SDL's should be considered settled policy settings. Reopening or adjustments of SDL limits would reintroduce uncertainty into the Basin framework, undermine confidence in local markets, and risk further structural adjustment in regions what have already delivered a significant share of the recovery task.

The priority for the next iteration of the Plan must therefore be to maintain existing SDL's, recognising the existing limits already satisfy environmental criteria, and to optimise environmental outcomes within this established framework.

Environmental Water Recovery

The proposed recovery of an additional 100GL in the Northern Basin through potential future acquisitions reflects a continuation of a policy approach that has already drawn heavily on Queensland's agricultural producers and the regional communities of the Northern Basin.

Water recovery to date has largely been delivered through the reallocation of water from existing landholders. While this reflected the most accessible pathway in the early stages of the Basin Plan, it has resulted in a concentration of impacts within productive regions. Extending this approach risks compounding those impacts without delivering meaningful environmental gains.

Water recovery permanently removes water from productive systems, reduces economic activity in regional areas, and creates uneven impacts across irrigation districts. These effects are amplified in the Northern Basin, where communities are less diversified, more reliant on irrigated agriculture, and more exposed to climatic variability.

At this point in the evolution of the Basin Plan, continuing to rely on water recovery signals a failure to transition to more efficient and targeted mechanisms. The Basin has moved beyond

just adding more water. The policy focus must now shift toward improving environmental outcomes through better use of the water already recovered, supported by infrastructure investment, improved coordination, and more effective delivery.

Where water recovery is pursued, it must be voluntary, market-based, and supported by transparent environmental and socio-economic justification, recognising that further reliance on buybacks disproportionately impacts the same communities that have already delivered the majority of recovery targets.

Rules-Based Approaches and Connectivity

Proposed rules-based approaches to improve system connectivity represent a significant operational shift within the Basin.

While these changes are intended to enhance environmental outcomes, they have the potential to alter the timing and accessibility of water, reduce operational flexibility, and affect reliability in practice particularly in the Northern Basin. These systems are characterised by variable flows and opportunistic water use, therefore any changes to rules can have a disproportionate impact on production systems.

Any more toward rules-based approaches must be carefully assessed on a regional basis, with full consideration of cross-border impacts. Maintaining entitlement reliability in practice, not just in theory is critical.

This is particularly important in the context of a Basin framework where earlier reforms have already drawn heavily on productive water use. Any further erosion of practical reliability, whether through recovery or operational change, risks compounding impacts on the same regions.

Secure water entitlements, and critically the reliability attached to them, are fundamental to the operation of the Basin and to agricultural productivity. Changes to flow rules, access conditions or extraction timing can effectively reduce reliability even where entitlement volumes remain unchanged. This creates uncertainty that directly affects business viability, risk management, and long-term investment decisions. Maintaining entitlement reliability in practice, not just in theory must remain a core principle of any proposed reform.

Socio-Economic Impacts

The socio-economic consequences of water recovery must be treated as a central policy consideration, particularly given how recovery has been delivered to date.

In practice, the burden of adjustment has fallen disproportionately on Queensland's agricultural producers and the regional communities of the Northern Basin. This reflects the reliance of entitlement purchase as the primary recovery mechanism, effectively positioning these communities as the delivery vehicle for environmental water.

Current assessment approaches rely heavily on Basin-scale modelling and fail to capture the localised and cumulative impacts experienced within regional communities. These impacts include reduced productive capacity, declining economic activity, loss of service industries, and broader effects on population retention and community resilience.

In the absence of robust, regionally specific assessment frameworks, there is a risk that further recovery will continue to draw from the same communities without fully accounting for these cumulative effects. As the Basin has moved beyond just adding more water, any future recovery must be justified not only on environmental grounds, but against clearly demonstrated socio-economic outcomes at a regional level.

Complementary Environmental Measures

With the primary recovery task largely delivered through the transfer of significant water volumes from the productive sector to environmental use, the next phase of the Basin Plan must focus on improving system performance.

The opportunity now lies in maximising the environmental outcomes achieved from water already recovered. This includes addressing system constraints, improving delivery efficiency, and enhancing the coordination of environmental water holders.

Evidence increasingly demonstrates that system performance, rather than total water volume, is now the key limiting factor. A shift toward complementary environmental measures represents a more mature and effective phase of Basin reform, delivering greater outcomes without further reducing productive water use.

Invasive Species Management

Non-flow stressors, particularly invasive species such as carp, continue to constrain environmental outcomes across the Basin.

The increasing presence of Carp populations in the Basin continue to degrade water quality, disrupt river systems, undermining many ongoing localised efforts to support the recovery of native fish species. Addressing these issues represents a practical and cost-effective opportunity to impactful and improved Basin health outcomes.

A dedicated, coordinated and sustained effort to manage invasive species would deliver tangible environmental benefits and should be prioritised as a critical intervention over continued reliance on additional water recovery, particularly where such approaches risk delivering marginal gains at a disproportionate cost.

Indigenous and Cultural Water

QFF recognises the intent to advance Indigenous water interests and cultural outcomes.

Future approaches should be progressed through market-based mechanisms and frameworks that do not reduce the reliability of existing entitlement holders. Building on existing models that protect system integrity will ensure that cultural outcomes can be advanced without introducing additional uncertainty or unintended impacts.

Conclusion

The Murray Darling Basin Plan has delivered substantial reform, with Queensland's agricultural producers and the regional communities in the Northern Basin playing a central role in achieving water recovery and supporting improved Basin health. This has included bearing a significant share of the adjustment required to deliver environmental water.

As water, land and soil stewards, these communities recognise the immense value of a healthy Basin ecosystem, both above and below the surface in addition to the critical role it plays in sustaining agricultural productivity, regional communities, and environmental outcomes over the long-term. This includes supporting the communities dependent on local agricultural production that enable regional economic activity and long-term prosperity.

The Basin is now at a point where this approach must evolve. The next phase should not be defined by further water acquisition. The Basin has moved beyond just adding more water.

The policy focus must now shift toward improving system performance, addressing constraints, and delivering targeted environmental outcomes from the water already recovered. The remaining opportunity lies in incremental improvement that refines how the system operates rather than continuing to draw from the same source.

Maintaining the balance between environmental outcomes and productive capacity will be critical to ensuring the long-term success and durability of the Basin Plan.

QFF recommendations:

QFF calls on the Murray Darling Basin Authority to prioritise system optimisation over further water recovery by:

- maintaining current Sustainable Diversion Limits, recognising existing limits satisfy environmental sustainability criteria
- avoiding additional water recovery, particularly in the Northern Basin
- protecting water entitlements so their reliability is not reduced in practice
- prioritising complementary environmental measures to enhance the use of existing environmental water
- committing to a dedicated, coordinated and sustained effort to actively reduce invasive fish species with the Basin, bolstering efforts to restore native fish populations

QFF welcomes continued engagement with the Murray Darling Basin Authority to progress these priorities and ensure the Basin Plan delivers durable environmental outcomes alongside sustained regional productivity.



Yours sincerely

Jo Sheppard
Chief Executive Officer



This submission is provided by the Queensland Farmers' Federation

PO Box 12009 George Street, Brisbane Qld 4003
Level 8, 183 North Quay, Brisbane Qld 4000
ABN 44 055 764 488

Contact QFF

E: qfarmers@qff.org.au
P: 07 3837 4720
W: www.qff.org.au

