



QUEENSLAND
FARMERS'
FEDERATION



Review of the Water Act 2007 August 2026

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and Water

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This submission is provided to:

Department of Climate Change, Energy, the Environment and Water
Independent Reviewer Mr Geoff Leeper
Review of the Water Act 2007
Attention: Water Act Review Secretariat

Submitted via email wateractreview@dcceew.gov.au

Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- CANEGROWERS
- Greenlife Industry QLD
- eastAUSmilk
- Timber Queensland
- 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 Review of Water Act 2007.

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

Executive Summary

Queensland Farmers' Federation (QFF) supports a stable, transparent and effective national framework for managing water resources across the Murray–Darling Basin. The *Water Act 2007* has an important role in providing Basin-wide coordination, but the next phase of reform should focus on improving the effectiveness of the existing framework rather than adding regulatory complexity or expanding Commonwealth intervention without a clearly demonstrated benefit.

For Queensland agriculture, confidence in the water-management framework depends on secure and reliable water entitlements, predictable planning arrangements, clear institutional responsibilities and a genuine balance between environmental, social and economic outcomes. These settings underpin long-term investment in irrigated agriculture, regional processing, employment and community resilience.

QFF considers the Review should prioritise the following:

- **Protect the integrity and reliability of existing water entitlements.** Reform should not retrospectively weaken established rights, alter entitlement characteristics or transfer new policy costs to existing water users without clear justification.
- **Maintain a genuine balance between environmental, social and economic outcomes.** Water policy should recognise that healthy river systems, productive agriculture and resilient regional communities are interconnected. Major decisions should transparently assess the trade-offs and cumulative impacts involved.
- **Recognise consultation fatigue and act on the legacy of previous engagement.** Basin communities and agricultural industries have participated extensively in successive reviews, inquiries and consultation processes. Much of the feedback from agriculture remains

consistent. The Review should draw on this existing body of evidence, clearly demonstrate how previous feedback has informed its findings, and focus consultation on genuinely new or unresolved issues.

- **Provide legal and practical clarity around UNDRIP and First Nations water reform.** UNDRIP is a non-legally binding declaration. QFF supports stronger First Nations participation and practical cultural and economic water outcomes, but any statutory application of UNDRIP principles, including free, prior and informed consent, should be clearly defined and should not create uncertainty around existing water entitlements.
- **Streamline accreditation of Water Resource Plans.** WRPs remain the appropriate mechanism for connecting Basin Plan requirements with state water-planning frameworks. The Review should address the current accreditation process, which can be lengthy, duplicative and resource-intensive.
- **Recognise that climate variability is already embedded in Basin water management.** Existing Water Resource Plans and state frameworks are designed to operate through prolonged dry periods, flooding, changing inflows and variable rainfall. Climate change should be addressed through continued adaptation, better science and improved monitoring rather than by assuming an entirely new regulatory framework is required.
- **Shift the focus from environmental water recovery to environmental effectiveness.** The Basin now holds a substantial environmental-water portfolio. Future reform should place greater emphasis on the outcomes achieved from that water and on complementary actions that address invasive fish species, habitat degradation, fish passage, cold-water pollution and other constraints on river health.
- **Strengthen consideration of social and economic impacts.** Successive rounds of reform can have significant cumulative effects on irrigation-dependent communities. These impacts should be assessed before major decisions affecting consumptive water availability are made.
- **Treat water security as more than physical water availability.** For irrigators, water security also depends on entitlement integrity, reliability of access and predictable water-sharing rules. Any statutory definition should recognise these elements.
- **Improve real-time water information and forecasting.** More timely and operationally useful Bureau of Meteorology information on river flows, rainfall, storage conditions and downstream movements would support better operational decisions and more efficient use of available water.
- **Use the National Water Initiative as the appropriate national reform benchmark.** The NWI remains the governing framework until such time as a jurisdiction executes the proposed National Water Agreement. The Review should not pre-empt jurisdictional consideration of the proposed NWA or treat it as a settled national framework.

QFF considers the central test for this Review should be whether proposed reforms improve the durability, transparency and effectiveness of the existing water-management system while preserving confidence for communities and industries that rely on it.

The next phase of water reform should therefore be characterised by better implementation, stronger environmental effectiveness, improved information, streamlined administration and clear protection of established entitlement frameworks.

Objectives, Governance and the Role of the Commonwealth

QFF supports a national framework for managing the Murray–Darling Basin but considers the *Water Act* should remain disciplined in its purpose.

The Commonwealth has an important role in Basin-wide coordination, while Basin States retain substantial expertise and responsibility for water planning, allocation and operational management.

The Review should avoid unnecessary duplication of state frameworks. Additional regulatory layers can increase cost and complexity without necessarily improving outcomes.

The Act should also maintain a genuine balance between environmental, social and economic outcomes. Decisions affecting water availability should transparently identify the evidence relied upon, the trade-offs considered and the anticipated consequences for regional communities and productive industries.

QFF supports

- clear Commonwealth and State responsibilities;
- avoiding unnecessary regulatory duplication;
- balanced consideration of environmental, social and economic outcomes; and
- transparent and accountable decision-making.

First Nations Water Interests and UNDRIP

QFF recognises the cultural, social and economic connections of Aboriginal and Torres Strait Islander peoples to water and supports practical measures that increase First Nations participation and economic opportunity.

The Review should accurately reflect the status of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). UNDRIP is a non-legally binding declaration and does not, of itself, create legally enforceable obligations in Australian law.

Any proposal to translate its principles into obligations under the *Water Act* should therefore be subject to clear legislative scrutiny.

Concepts such as free, prior and informed consent should not be introduced without clear legal meaning or where they could create uncertainty around existing statutory water rights or operate as an undefined consent or veto mechanism.

First Nations water objectives should focus on practical cultural and socio-economic outcomes and be progressed through transparent and properly funded mechanisms. They should not be pursued through uncompensated reductions in existing water entitlements.

QFF supports

- stronger First Nations participation in water planning;

- practical cultural and economic water opportunities;
- recognition of UNDRIP as non-legally binding;
- clear legal parameters for free, prior and informed consent; and
- protection of existing water-entitlement integrity.

Water Resource Plans

QFF supports retaining Water Resource Plans as the principal mechanism connecting Basin Plan requirements with state water-planning frameworks.

In Queensland, this allows Basin-wide objectives to be implemented through established systems that reflect local hydrology, entitlement arrangements and regional circumstances.

Climate variability is an established feature of Basin water management. Existing Water Resource Plans are already designed to operate through prolonged dry periods, episodic flooding, changing inflows and variable rainfall across catchments.

The Review should therefore avoid assuming that climate change requires an entirely new water-management framework. The appropriate focus is ensuring existing planning tools remain adaptive and informed by the best available science.

The most significant concern for QFF is the accreditation process for Water Resource Plans. Accreditation can be lengthy, resource-intensive and unnecessarily complex despite plans being developed through established state frameworks.

The Review should prioritise a streamlined, proportionate and outcomes-focused accreditation process that reduces duplication, recognises state processes and provides greater certainty for governments and water users.

WRP accreditation should not become a mechanism for adding Commonwealth requirements beyond clearly established Basin Plan obligations.

QFF supports

- retaining WRPs and Basin State responsibility for their preparation;
- recognising existing planning frameworks already manage substantial climatic variability;
- streamlining accreditation to reduce delay and duplication; and
- adaptive planning without unnecessary disruption to established entitlements.

Environmental Water and Environmental Outcomes

The Basin now contains a substantial portfolio of water dedicated to environmental purposes.

QFF considers the next phase of reform should shift from a predominant focus on the volume of environmental water recovered to the environmental outcomes achieved from that water.

Environmental water is important, but water volume alone does not determine river health. Its effectiveness depends on how strategically it is managed and whether it is combined with other actions addressing major ecological constraints.

Invasive fish species are a clear example. Carp and other pest species can undermine native fish populations, water quality and aquatic habitat. Additional environmental water alone will not resolve these pressures.

Greater strategic emphasis should therefore be placed on:

- invasive-fish management and control;
- native-fish habitat and breeding areas;
- improved fish passage;
- cold-water pollution;
- riparian and wetland rehabilitation;
- targeted water-quality interventions; and
- coordination between environmental watering and complementary programs.

Environmental-water holders, Basin governments and natural resource management programs should work more closely so that water, habitat, infrastructure and pest-management actions reinforce one another.

QFF considers this approach can deliver greater environmental returns from water already recovered and reduce the assumption that further recovery from productive use is necessarily the most effective response to remaining environmental challenges.

This is particularly important in the Northern Basin, where highly variable hydrology means environmental outcomes cannot be understood solely through annual volumetric targets.

QFF recommends

- shifting the focus from environmental-water volume to measurable outcomes;
- optimising existing environmental water before considering further recovery;
- a stronger Basin-wide response to invasive fish species;
- integrating environmental watering with complementary measures; and
- transparent reporting of ecological outcomes.

Social and Economic Outcomes and Water Security

Water reform has direct consequences for agricultural businesses and regional communities.

Changes in consumptive water availability can affect production, employment, processing industries, infrastructure, land values and regional economies. These impacts should be assessed before significant decisions are made.

Particular attention should be given to cumulative impacts. Basin communities have experienced successive rounds of reform, and the combined effects can be substantially greater than any individual intervention.

There is also significant consultation fatigue across Basin communities. Agricultural industries and regional communities have repeatedly contributed to reviews, inquiries and reform processes, often

raising the same concerns around entitlement security, regional impacts, water recovery and regulatory certainty. This existing body of evidence should not be continually reset with each new review. QFF considers the legacy of previous consultation must be actively recognised and implemented, with this Review clearly demonstrating how established feedback has informed its conclusions and focusing further engagement on genuinely new or unresolved matters.

The Review's consideration of water security also warrants caution.

For irrigators, water security is not simply the physical availability of water. It also includes:

- security and integrity of statutory entitlements;
- reliability of access;
- predictable water-sharing arrangements; and
- certainty sufficient to support long-term investment.

Climate adaptation should continue through established adaptive water-planning frameworks supported by improved science and monitoring. It should not become a mechanism for continually reallocating climate risk to existing entitlement holders.

Any statutory definition of water security should expressly recognise entitlement security and reliability.

QFF supports

- recognition and active use of previous consultation findings to reduce consultation fatigue and avoid repeatedly seeking the same evidence from Basin communities;
- consideration of social and economic impacts before major decisions;
- assessment of cumulative and regional impacts;
- recognition of entitlement reliability as a core element of water security; and
- climate adaptation through existing planning frameworks.

Water Information

Accurate and timely water information is critical to efficient water management, particularly in highly variable river systems.

QFF supports the Bureau of Meteorology's national water-information role but considers there is scope to improve the timeliness, accessibility and practical usefulness of real-time and near-real-time monitoring.

More responsive information on river flows, rainfall, storage conditions and downstream movements would support better decisions about water access, pumping, storage and irrigation scheduling.

Better real-time information can therefore contribute directly to more efficient use of available water.

The Review should consider how existing Bureau services can be strengthened, including improved integration with state monitoring and forecasting systems.

QFF supports

- improved real-time and near-real-time water monitoring;
- more accessible and operationally useful information;
- stronger Commonwealth and state data integration; and
- continued investment in streamflow forecasting.

National Water Initiative and Future Reform

QFF supports continued national cooperation on water reform.

The National Water Initiative (NWI) remains the governing framework until such time as a jurisdiction executes the proposed National Water Agreement (NWA).

Accordingly, the Review should use the NWI as its primary national reform reference point and should not pre-empt jurisdictional consideration of the proposed NWA.

The NWI provides an established foundation for secure water entitlements, transparent planning and efficient water markets.

The proposed NWA should not be treated through this Review as a settled national framework. Any future proposal to incorporate NWA commitments into the *Water Act* should be subject to separate consultation and assessment of impacts on entitlement holders, state water frameworks, agricultural productivity and regional communities.

Conclusion

QFF considers the Review should strengthen confidence in Australia's water management framework.

For Queensland agriculture, this requires secure and predictable water entitlements, effective state-based planning, accountable institutions and a genuine balance between environmental, social and economic outcomes.

Reform should build on the adaptive planning frameworks already in place, streamline unnecessary regulatory processes and place greater emphasis on achieving measurable environmental outcomes from the considerable water already recovered for the environment.

Improved real-time water information should also support more efficient operational decision-making and productive water use.

First Nations water objectives should be progressed through clear and properly funded mechanisms that provide certainty for all water users.

Ultimately, successful reform depends on improving the effectiveness of the existing system without unnecessarily duplicating state responsibilities or undermining established water rights.

Yours sincerely

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