

# Preliminary public consultation: Proposed replacement of Gold Coast Water Plan (June 2023)

## Prepared by:

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## Prepared for:

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Department of Regional Development,  
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This submission is provided to:

Department of Regional Development, Manufacturing and Water  
Chief Executive  
Water Planning and Science South Region  
Attention: Senior Policy Officer

Submitted via email [GoldCoastWP@rdmw.qld.gov.au](mailto:GoldCoastWP@rdmw.qld.gov.au)

## Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- 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
- Queensland Oyster Growers Association
- Lockyer Water Users Forum

## About the Queensland Farmers' Federation

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

We are a member-based organisation representing the interests of peak agriculture industry organisations (both state and national). Through our members, QFF represents more than 13,000 primary producers across the cotton, sugarcane, horticulture, dairy, nursery and garden, poultry, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

## Submission

**Re: Preliminary public consultation notice - Proposed replacement of the Gold Coast Water Plan (2006) - s44 of the Water Act 2000 (June, 2023).**

QFF welcomes the opportunity to provide comment on Preliminary public consultation notice – Proposed replacement of the Gold Coast Water Plan (June 2023).

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

## Background

Queensland's regulatory framework for the management of water resources is established in the [Water Act 2000](#), which provides the bases for catchment-based water planning.<sup>1</sup> The Gold Coast water plan area is currently under review to develop a replacement of the water plan that addresses emerging issues within the water plan area, which covers approximately 1,300 Km<sup>2</sup> of South East Queensland.

The water plan supports water needs for urban centres, Pimpama, Jacobs Well, Springbrook, Natural Bridge, Binna Burra and parts of Tamborine Mountain. The hinterland areas of Springbrook, Natural

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<sup>1</sup> [Water | Department of Regional Development, Manufacturing and Water \(rdmw.qld.gov.au\)](#)

Bridge, Binna Burra and Tamborine Mountain rely heavily on Unsupplemented surface water and groundwater, and many do not have access to reticulated water supply.

For supplemented water within the area, surface water from Hinze Dam and Little Nerang Dam is supplied through the Nerang Water Supply Scheme which is owned and operated by [Seqwater](#).

The aim of the preliminary public consultation is to advise stakeholders and the community about the replacement of the water plan and proposed planning process.

Key issues to be considered during the review and replacement include:

- effectiveness of outcomes, measures, strategies, and performance indicators set out in the water plan.
- opportunities for new unallocated water reserves
- future urban needs and water security for off-grid communities
- effectiveness of water sharing and water trading rules
- effectiveness of environmental management rules
- incorporating best-available science, including consideration of climate change on water availability and the water needs for the environment.
- underground water management in the moratorium areas of Tamborine Mountain and Springbrook
- overland flow and underground water management
- current and emerging interests of Aboriginal people and Torres Strait Islanders, and Native Title holders in relation to water resources in the plan area
- entitlements without volumetric limits
- requirements under the *Human Rights Act 2019*.

As per the *2020-2030 Water Planning Science Plan*,<sup>2</sup> water plans are developed to sustainably manage Queensland's water resources by balancing the needs of water users and the environment. These plans determine the amount of water that is available and regulate the allocation and management of it in a plan area. The Logan Basin Water Plan is coming up to its first renewal in twenty years which is the maximum period in which a water plan can be extended. As a result of this extended period, there has been a series of commodity groups operate under different takes of water, some under an area-based water allocation, with some managing their own take of water from different river systems. Both the Gold Coast Water Plan and the Logan Water Plan areas, (which are expiring at the same time) will see similar issues that are addressed in this submission, outlined below.

## Overview

The Gold Coast Water Plan covers a significant portion of the Southeast of Queensland.

In this area, QFF has members including the Nursery and Garden Industry Queensland, eastAUSmilk, Queensland Fruit and Vegetable Growers, and Canegrowers.

It is important to note that a few issues that have already arisen from QFF members that need to be addressed with diligence and important consideration, to ensure that these matters do not cause adverse impacts amongst growers.

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<sup>2</sup> Queensland. Department of Environment and Science and Queensland. Department of Regional Development, Manufacturing and Water (2020) *Water planning science plan 2020-2030*. Brisbane: Queensland Government.

As part of this process, it is vital to understand that there are growers that are fractured in their take of water and that metering is a new process, that will take intensive consultation and education to ensure water security is assured for the long-term viability of farm businesses.

A full investigation into the varied takes of water, needs to also consider the use of water to ensure fair and equitable take of water occurs in the system, however it is vital that all matters that are assessed throughout this process, need to acknowledge that a one size fits all, does not necessarily apply and a case by case basis may be required to ensure implementation of changes are attainable and economically viable.

## Summary of identified key issues

- There is a cluster of multi-million-dollar businesses in the area still operating on the old 5-acre licences.
- During the last drought, the Department wanted to impose stop pumping orders on commercial users on Upper Coomera. There was no data to support this and no intent to engage with riparian users at same time. There are also reports of the continued use of poly pipe running for kilometres from isolated crescentic ponds to properties.
- Riparian use in these areas has grown exponentially since the previous Queensland Government made it legal for riparian users to irrigate 0.5Ha without any licencing or monitoring requirements. There are still many local water users, that do not understand what the 0.5Ha rule means.
- Volumetric conversion at the proposed rate used by Department e.g., 6ML per Ha, will contribute to the demise of many businesses, rendering them unviable. There is little or no scope for water trading in many of the smaller systems (unlike in Sunshine Coast area), so limited or no opportunity to buy extra ML.
- The Upper Coomera is currently overstrained.
- As climate change now forms part of the water planning process it is vital that detailed modelling, utilising the latest groundwater flow models (including groundwater dependent ecosystems – GDE's), is assessed to provide an overview of whether climate change will adversely impact the use of water in this region. Having a forecasted outlook will allow business owners to forward plan for mitigation and adaptation strategies.
- Early indicators that water related effects of climate change on water availability, must be considered. Water availability and the potential impacts to land use and may alter the future commodity type that can be farmed in regions.
- A change in weather and climate will impact water security, which is a primary driver for agricultural production in the Gold Coast Water Plan catchment area.
- As per the *Water planning science plan 2020-2030*,<sup>3</sup> understanding the economic and social value of groundwater utilised for consumptive use including agriculture needs to be considered as a priority in this water plan, which incorporates not only economic metrics such as water usage, potential for industry growth, price and market functionality but also prioritising the social metrics of reliability of supply and continual access of water for primary production.
- As volumetric meters are rolled out throughout the state, it is important to undertake education and consultation, and provide sufficient time for new meters to be installed, and what the associated costs will be.

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<sup>3</sup> Queensland. Department of Environment and Science and Queensland. Department of Regional Development, Manufacturing and Water (2020) *Water planning science plan 2020-2030*. Brisbane: Queensland Government.

- It is important that department consider the take of water from upstream water users when a river isn't in full flow, which could leave downstream users with an insufficient supply of water, and how this will be accounted for, to stop this occurring.
- Protecting existing allocations is vital including the provision for future business growth.
- Looking for opportunities for new unallocated water reserves is imperative for the future growth and long-term sustainability of agriculture and protecting allocations from urban development.
- The regulation of overland flow would be incredibly damaging to some agricultural businesses in this region, where overland flow is currently unregulated. Detailed consultation and measurement of the catchment would be required if the regulation of overland flow was implemented, to investigate any impacts dams that captured overland flow would have on a system.

## Matters to be considered

**Water trading** – in regards to water trading it should remain very clear that allocation should always remain with a landholder in the catchment, and for agricultural use. Should water trading be opened to outside parties, it could be to the detriment of the farming community due to profiteering.

**Allocations** – The Mary River Water Plan Review indicated a figure of 6mL/hectare was given to licence holders as part of the Mary River review. Although there has not been any measurements or data facilitated at this stage of the water plan review, there is concern around these figures given that some farmers are utilising 10-12ML. It is vital that current measurements are thoroughly investigated as part of this process, to ensure an appropriate figure on what is an average and reasonable usage for each water user.

**River health** – This review needs to consider all factors that affect the ecosystems sustainability in this water plan and long-term health of all the catchment river systems and watercourses, for which many farm businesses rely on.

## Opportunities

The upcoming suite of water plans require all member groups to be involved. Intensive and direct consultation is required to get a good representation of views and educated feedback. The timing of these plans occurring within a short period of one another, as we are aware have occurred due to various factors, with some now at the peak of their iteration and can no longer be extended. As such, it is important that a thorough investigation of the Gold Coast Water Plan is undertaken, and negotiations implemented to help keep businesses viable, through both affordability and surety of water security.

Given the complexity and added modelling required for the water planning process, a suggested policy opportunity would be to amend the time frame to begin in depth research mid-way through the water plan cycle, so that all data necessary is available at the commencement of the consultation period. QFF are aware that both the Logan and Gold Coast Water Plans do not have this option, but it could be seen as a lever to help adjustments to changes to water allocations and legislative changes to water for the future and help ease the transition of complex water plans for the agriculture sector.

A delegation from the Minister to enact specified research required to assess water security in each water plan area, may alleviate some concerns as we transition through the energy transition to renewables and integrate climate change modelling into the impacts of available water through extreme weather events. Currently the iterations of the water plans are done ad-hoc dependent on what is happening in the region, which can be extended out to twenty years, however doing mid cycle reviews will give more trust and transparency of the process to those dependent on water for their businesses.

## Solutions

- Extend consultation time frame, whilst engaging in feedback throughout the whole process.
- Identify groups to be impacted and why. E.g. change from area based licences to volumetric licences.
- It is important that historical use of irrigation water, environmental water and cultural water along with climate modelling that will be utilised to determine the volumetric conversion, is clear and transparent for water users to understand. This will allow for a less disaggregated community and one that is engaged and informed.
- Increased water allocations, that maybe extended to environmental water because of climate modelling, needs to be explained thoroughly to ensure all riverine ecosystems remain sustainable and healthy.
- Education required on aspects of environmental and cultural water.
- Evidence based science used for upcoming water plans that incorporates climate change and hydrological modelling requires a clear and educated consultation process..
- Details of the process, timeframes, and maps required online in a stop light system to where process currently lies, and when consultation is taking place.
- The impact of legislative changes to the Gold Coast Water Plan and possible options for nurseries via the farm business resilience program / Drought preparedness Grant Scheme to assist nurseries prepare to mitigate the risk of reduced water security. This could be an economic option to aid growers in managing less water.

## Co-Benefits

- More confidence from the community if seeking involvement and providing detailed education on matters that they may not understand.
- Bringing communities together to be given the opportunity to speak and get involved in the process, allows greater confidence in the Government, and enables a degree of ownership in the process which has not been seen before.
- Allows the Departmental process to continue with ease and stay on track for current deadlines.
- Possible utilisation of recycled water in water constrained areas, that can be utilised in industries such as Nursery, especially for those are being encroached by urban development.

## Summary

Ownership, transparency, trust and education are the key components to undertake stakeholders through the water planning process, especially in areas that have a variety of uptake and different applications of water.

The first step of the water planning process needs to be a clear plan and engagement of all stakeholders at the beginning, and identifying gaps in the information piece that needs to be

explained thoroughly to ensure people are provided with sufficient time and resources to be able to give an educated response and understand what the process means for them.

Many businesses that are utilising water that are either have area based or volumetric licences do not necessarily understand the implications of change and for those that are not on either, need to have these discussions on a case-by-case basis.

One major concern in the Gold Coast Water Plan is the use of riparian zones, that have increased dramatically since the last water plan, and therefore the changes proposed in the water plans will cause some issues and confusion amongst the riparian water users.

There is currently a significant amount of water use which has overstretched the Upper Coomera region, as one example, which could impact local dams and use of water allocations from other water users.

In summary there are a wide range of water plans coming up for renewal over the next few years, that require an in-depth amount of research and modelling to be undertaken to ensure that as a state we are accountable for the water we use.

Delaying some future water plans, to ensure those that are in water plan areas that require more intense investigation need the time allocated, to ensure that ownership, transparency, trust and education of water is done correctly.

This will help to minimise conflict within different water user groups, provide a basis for ongoing involvement for all relative stakeholders that will help towards understanding the outcomes for all water users.

If you have any queries about this submission, please do not hesitate to contact Ms Sharon McIntosh at [sharon@qff.org.au](mailto:sharon@qff.org.au).

Yours sincerely

Jo Sheppard  
Chief Executive Officer





**This submission is provided by the Queensland Farmers' Federation**

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