17 November 2025

The Office of the Great Barrier Reef
Queensland Government

RE: Submission to the public consultation on the draft Reef 2050 Catchment Water Quality Strategy

Acknowledgment of Country

The Capricorn Conservation Council acknowledges and respects the Traditional Owners and Elders of the land and waters which we conserve and protect. We pay respect to all Elders, past and present for they hold the memories, the culture, and the dreams of the Aboriginal and Torres Strait Islander People. Sovereignty was never ceded, this always was, always will be Aboriginal Land.

Introduction

Capricorn Conservation Council (CCC) is deeply concerned about water pollution from land-based activities threatening the health of the Great Barrier Reef and undermining its resilience against the accelerating impacts from climate change. As the peak environmental organisation for Central Queensland, working on Darumbal and Woppaburra Country, CCC advocates for the protection of biodiversity, the empowerment of Traditional Owners, and community-led stewardship across our region. We bring a long-standing commitment to science-based conservation and regional knowledge of the Fitzroy catchment—one of the most sediment-affected catchments in the Reef system.

In 2025, the critical water quality targets were missed once again. At the current rate of progress and allocation of public investments, it is unlikely they can be met by the new deadline of 2030. The joint government Reef 2050 Catchment Water Quality Strategy (the Strategy) represents the single most important opportunity to reduce water pollution at this critical moment for the Reef.

The Strategy must therefore establish a clear and actionable pathway, guiding government investment and prioritising cost-effective management actions to reduce water pollution in Reef catchments to meet critical targets by 2030. This requires meaningful engagement with communities, Traditional Owners, and regional organisations like CCC, who bring local knowledge, cultural insight, and practical experience in catchment management.

After many stakeholders raised significant concerns about the Strategy's lack of focus and detail on delivery at the Brisbane workshop on 24 July 2025, we were reassured that the draft being released for public consultation had significantly improved.

However, the draft released for consultation does not provide information on how the

latest scientific consensus statement, learnings from over two decades of managing land-based activities in Reef catchments, and feedback from stakeholder consultation were used to inform the proposed Strategy. Nor does it reflect the critical role of Traditional Owners and Indigenous knowledge systems in land and water management, a key value emphasised in CCC's work.

Traditional Owners' rights and cultural relationships to water must also be central to the Strategy. As outlined in the Australian Government's First Nations water policy framework, recognising and restoring cultural flows—water entitlements that are legally and culturally owned, managed, and used by First Nations peoples—is essential to supporting healthy Country. Cultural flows protect waterways, restore ecological processes, and strengthen community wellbeing through continued cultural practice and connection to land and water. The Strategy should explicitly commit to supporting cultural flows and ensuring that water planning, allocation, and restoration programs uphold First Nations' inherent rights to manage and care for water on Country.

The draft lacks clear responsibilities and accountability for delivery, assigning governance to regional and local partners without clear guidance and oversight.

The current draft Strategy merely represents a broad framework that lacks focus and a clear and actionable pathway towards meeting water quality targets. A genuine whole-of-catchment approach must centre biodiversity, riparian health, wetland restoration, and community participation—core principles in CCC's Strategic Plan.

To make the final Strategy fit for purpose and preserve the Outstanding Universal Value of the Reef, we urge the Australian and Queensland governments to:

1. Ensure the focus and primary objective of the Strategy is to achieve science-based water quality targets by 2030.

2. Deliver a targeted and fully-costed implementation plan.

3. Assign clear responsibility and accountability for delivery and ensure transparent tracking and reporting of progress against investments.

4. Include all revised targets (or commit to incorporating these once finalised) and a commitment to meeting them by 2030.

CCC emphasises that achieving these targets will require strong partnerships with regional communities, Traditional Owners, and environmental organisations who are already contributing to local stewardship and land restoration.I urge your governments to seize this decisive opportunity and deliver a targeted plan underpinning the implementation of the revised Strategy. Considering the significant amount of work ahead to improve the draft Strategy and make it fit for purpose, we encourage you to consider extending the deadline for delivery of a final Strategy.

Without a clear pathway and sufficient funding to meet water quality targets by 2030, we risk that management actions and investments remain fragmented and insufficient to sustain the health and resilience of the Great Barrier Reef, jeopardising its World Heritage status.

Detailed analysis and recommendations

1. Focus and objectives

The draft Strategy lacks a clear and consistent focus on improving water quality, with

conflicting objectives and no logical framework linking land-based pollution sources, targeted management actions, and meeting the 2030 water quality targets.

Successful conservation requires integrating scientific evidence with Indigenous cultural knowledge, biodiversity protection, and community participation. These are currently absent from the Strategy's framing.

Recommendations:

- Focus the Strategy on achieving its core objective—meeting the science-based water quality targets by 2030.
- Include a clear theory of change and logic framework that connects problems, priority actions, and measurable outcomes.
- Recognise the role of Traditional Owners, local communities, and regional environmental groups in delivering on-ground outcomes.
- Include Traditional Owner–led planning frameworks to guide land and sea Country management within catchments.
- Ensure biodiversity protection is embedded as a core objective explicitly linked to water quality outcomes.

2. Implementation plan

The draft Strategy is a high-level framework without a clear delivery plan, lacking clear actions and accountability. Without sufficient and targeted funding for well-defined priority actions, it will fail to achieve the 2030 water quality targets.

Recommendations:

- Include a clear, time-bound delivery plan outlining how actions and investments will achieve the 2030 targets.
- If the Strategy remains a guiding framework only, include a commitment to develop a plan for its delivery within a set timeframe.
- Define specific, measurable actions linked to clear deliverables.
- Identify responsible parties and measures of progress.
- Ensure actions are practical and targeted to enable effective on-ground implementation across Reef regions—including high-priority areas such as the Fitzroy Basin.
- Clearly identify funding sources and their expected contributions to ensure funding will be sufficient to meet the targets and outcomes of the strategy by 2030.
- Ensure cost-efficiency through coordinated funding programs.
- Commit to the development of an updated cost-benefit analysis of what it will cost to implement the final Strategy and reach the revised targets and desired co-benefits.
- Fund community-based and Traditional Owner–led on-ground programs that support riparian restoration, cultural catchment management, and land stewardship.

- Provide long-term investment in extension services and regional capacity-building programs to ensure landholders have ongoing support.

3. Accountability, transparency, and coordination

The draft Strategy lacks clarity on governance, accountability, and transparency. It does not define who is responsible for delivering and reporting outcomes, how decisions and funding will be coordinated, or how scientific evidence and previous program evaluation will guide a targeted and effective approach to achieving 2030 water quality targets.

4. Traditional Owner Leadership and First Nations Water Policy

CCC strongly supports the Australian Government's commitment to embedding First Nations leadership, knowledge systems, and decision-making authority in water management, as articulated in the national First Nations water policy framework. This includes upholding cultural water rights, supporting self-determined governance, and ensuring that First Nations peoples are central to the planning, design, and delivery of water programs.

The Strategy must reflect these principles by:

- Recognising Traditional Owners as partners—not stakeholders—in catchment planning.
- Embedding cultural water values and Indigenous knowledge systems as core components of waterway health.
- Supporting Country-based management that restores rivers, wetlands, and riparian systems in ways grounded in cultural practice and long-term stewardship.
- Providing equitable access to data, decision-making forums, and governance structures for Traditional Owners.
- Ensuring that investment programs include dedicated, long-term funding for Indigenous water management, ranger programs, and community-led cultural restoration projects.

A Strategy that does not incorporate First Nations leadership fails to reflect contemporary national policy and the commitments expressed on the Government's First Nations water policy page. Strengthening these elements is essential to achieving durable and culturally appropriate water quality outcomes for the Reef.

Recommendations:

- Establish a coordinated governance framework assigning responsibilities and accountability for delivery, oversight, and reporting.
- Clearly demonstrate how scientific evidence, reports on target development, and learnings from previous WQIPs inform decision-making and prioritization of investments and make this information publicly available.
- Adopt a targeted approach prioritising high-risk catchments and the most

cost-effective actions.

- Develop a consistent monitoring and evaluation framework using clear metrics to track progress and commit to timely public reporting of progress against investments.

5. **Targets**

The draft Strategy provides outdated targets, many still under development, only at the Reef-wide scale and does not include the timeline of meeting targets by 2030, committed to UNESCO.

Recommendations:

- Include revised water quality targets at Reef-wide, regional, and catchment levels, or provide clear timelines and mechanisms for finalising and incorporating them.
- Establish agricultural management practice adoption targets at the catchment or regional scale, focusing on cost-efficiency, likelihood of adoption, and the largest risks to water quality.
- Establish a specific target to increase riparian vegetation at the Reef-wide, regional, and catchment levels
- Identify and implement approaches to prevent vegetation clearing from undermining catchment restoration and water quality improvements.

Other missing priorities

1. **Legislation and regulation**

The draft strategy lacks any detail on how regulations and compliance programs will be implemented to efficiently contribute to meeting targets.

Recommendations:

- Clearly identify the role of statutory legislation relevant to Reef water quality, including the Reef Protection Regulations (RPRs), the Great Barrier Reef River Basins End of

- Basin Load Water Quality Objectives (Reef WQOs), environmentally relevant activities (ERAs) regulated under the Environmental Protection Act 1994, and the Vegetation Management Act 1999, and ensure compliance programs are effective and linked to
- water quality improvements.
- Identify clear management solutions to stop and reverse the loss of vegetation, particularly in the riparian zone, including alternative protection solutions for vegetation in Category X, which can currently be legally cleared, exacerbating sediment pollution and undermining restoration efforts.

2. **Urban, industrial and agricultural development in Reef catchment areas**

The draft strategy does not address the potential impacts on water quality from Urban, industrial and agricultural development in Reef catchment areas.

Recommendations

- Consider the impacts on water quality from the construction and operation of large water supply dams and from new agricultural development supported by proposed dams in Reef catchments.
- Establish that all wastewater treatment plants must meet their licence conditions.

Conclusion

The Reef cannot afford another strategy that lacks delivery, clear governance, and targeted investment. As an organisation grounded in science, guided by Traditional Owners, and committed to biodiversity protection and community-led stewardship, CCC urges governments to produce a Strategy that delivers tangible, measurable progress toward improved water quality by 2030.

With adequate resourcing, transparent governance, and a strong focus on catchment health, the final Strategy can support resilient landscapes, strong regional communities, sustained cultural connections, and a healthy Reef for generations to come.

Respectfully,

Capricorn Conservation Council

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