

Department of Local Government, Water and Volunteers

Logan Basin Draft Water Plan Review

Australian Beverages Council Limited

29 April 2026





The Australian Beverages Council Limited (ABCL) is the leading peak body representing Australia's non-alcoholic beverages industry.

For over 75 years, the ABCL has been the only dedicated advocate for this industry, representing approximately 95 per cent of the industry's production volume. Our members range from Australia's largest drinks manufacturers to small and micro beverages companies whose drinks are enjoyed nationally as well as around the world. These beverages include carbonated soft drinks, energy drinks, sports and electrolyte drinks, frozen drinks, bottled and packaged waters, 100 per cent juice and fruit drinks, cordials, iced teas, ready-to-drink coffees, kombuchas, flavoured milk products and flavoured plant milks.

Introduction

The ABCL welcomes the opportunity to provide this submission in response to the draft Water Plan (Logan Basin) 2026, the draft water management protocol, and the draft water entitlement notice. We support the Queensland Government's objective of managing both groundwater and surface water resources in a sustainable, science-based, and transparent manner.

The Australasian Bottled Water Institute [ABWI], the dedicated water division of the ABCL, is an industry certification body for both bottlers and water source owners in Australia, New Zealand and the South Pacific. Bottled water produced by ABWI members must meet the ABWI Model Code, a standard which goes beyond the minimum requirements of a food safety program and encompasses industry-leading requirements: a global standard of excellence in safety, quality and sustainability.

Our members rely on policy frameworks that ensure secure, sustainable, and appropriately regulated access to water resources for food and beverage production, including authorised bottled water operations.

The ABCL strongly advocates for sustainable water management, the protection of groundwater-dependent ecosystems, and regulatory frameworks that are practical, transparent, and evidence-based.

Recommendations

The ABCL supports the Draft Logan Basin Water Plan 2026 and its proposed underground water management reforms, including formalising the moratorium, creating the Tamborine Mountain (Logan Basin) UGWMA, and allowing continued use of existing and legally constructed bores. However, we take issue with the proposed prohibition on repurposing extraction from existing bores to a new use (e.g. from irrigation to commercial bottled water use).

Repurposing authorised bores without increasing extraction volume efficiently reallocates water while preserving total aquifer take and avoiding additional environmental impact.

This prohibition diverges from regulatory practices in NSW, Victoria, South Australia, and Western Australia, which manage groundwater primarily through extraction limits (e.g., LTAAELs, SDLs) and impact assessments under the Water Act 2000.

Australasian Bottled Water Institute and Water Extraction Transparency

The Australasian Bottled Water Institute (ABWI), the dedicated water division of the ABCL, is the recognised representative body for the bottled and packaged water industry across Australia, New Zealand, and the South Pacific.

ABWI plays a central role in representing industry interests and providing authoritative guidance on product standards, production practices, quality assurance, industry developments, and consumer expectations. Its members supply a diverse range of products across the water market, including mineral, glacier, rainwater, spring, purified, packaged, and table water.

ABWI is the only industry body in the region that certifies bottled water operations across both water sources and bottling facilities. Its certification framework, established through the ABWI Model Code, imposes requirements that exceed baseline food safety standards, ensuring high levels of quality, safety, and environmental stewardship.

Certification under the ABWI framework is independently audited and provides a credible assurance to regulators and consumers that certified operators adhere to best-practice groundwater management and production standards. Accreditation requires annual third-party audits, reinforcing transparency, accountability, and continuous improvement.

Since 2021, ABWI certification has required members to demonstrate a clear commitment to responsible groundwater management through:

- Annual sustainability assessments, including analysis of rainfall data, extraction volumes, groundwater levels, and aquifer recharge rates
- Five-yearly hydrogeological reviews assessing basin characteristics, water stress, land-use changes, and external impacts on water availability
- Implementation of community engagement plans to enhance transparency and stakeholder communication
- Provision of extraction data to the ABCL for aggregation and reporting

The industry further supports improved access to groundwater data through initiatives such as the ABCL's interactive water extraction map, introduced in 2020.

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This platform provides aggregated, localised data on water sources, extraction bores, allocated volumes, and actual extraction volumes across Queensland, based on member-supplied data. The dataset is regularly updated and demonstrates the industry's ongoing commitment to transparency and responsible groundwater use.

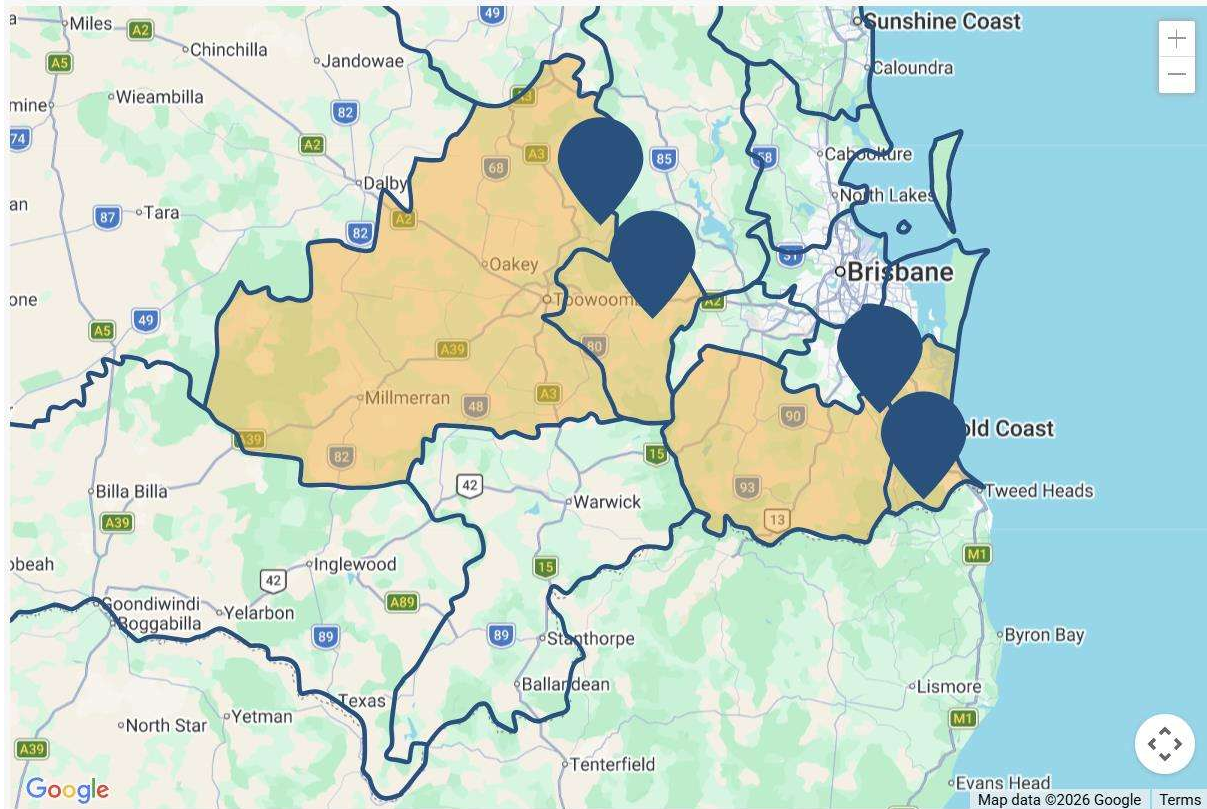


Figure 1: Example of the [Queensland water extraction map](#)

Conclusion

The ABCL supports the proposed reforms aimed at strengthening sustainable and evidence-based water planning within the Logan Basin.

However, we maintain that the final framework should not prohibit the repurposing of extraction from existing licensed bores to a new use, provided there is no increase in authorised extraction volume and no additional environmental risk.

Such repurposing represents a practical and legitimate means of accessing water supply without causing additional detriment to the aquifer. Regulatory settings should remain focused on extraction impacts and groundwater sustainability, rather than the ultimate end use of water.

A final plan that reflects these principles will better promote certainty, proportionality, and transparency for existing lawful users, while continuing to support environmental protection and maintaining community confidence.