



The Research Director
Agriculture, Resources and Environment Committee
Parliament House
BRISBANE QLD 4000
AREC@parliament.qld.gov.au

9-10-2014

Dear Sir/Madam, **Re: Water Reform and Other Legislation Amendment Bill 2014**

Thank you for the opportunity to provide this submission to the Water Reform and Other Legislation Amendment Bill 2014.

Cotton Australia is the peak body representing Queensland cotton growers, the vast majority who are irrigators, primarily in the Central Highlands, Dawson Valley, Burnett, Darling Downs, Lower Balonne, Condamine and Border Rivers Regions.

In addition there is significant interest in the expansion of the cotton industry in the more northern areas of the State including the Burdekin, and Flinders and Gilbert Rivers Areas.

Cotton Australia is a member of the Queensland Farmers Federation (QFF) which has prepared a comprehensive submission to this inquiry, which Cotton Australia endorses.

However, Cotton Australia would like to make the following key points:

- Cotton Australia supports the overall Purpose Statement
- Cotton Australia supports the changes to the Water Planning Framework
- Cotton Australia supports the Water Development Option provisions , however raises the following concerns –
 - Provision of water for major projects cannot be at the expense of existing irrigators, either in terms of entitlement or reliability.
 - Ideally, Water Resource Plans should clearly and publicly identify where water is still available to be allocated, and large projects should not have any specific advantage in securing water supplies.
 - The market should be recognised a primary source of water for new projects, wherever the water resource is constrained.
- While Cotton Australia is generally supportive of reduction in “red tape”, in the area of water policy it is critically important to get the balance right. Most of our irrigators have now gone through decades of water reform, and their water entitlements represent a very significant asset to their business. While Cotton Australia has some sympathy for

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deregulating small licences in Upper Catchments, it cannot support this if it could have any negative third party impacts on downstream irrigators. Cotton Australia recommends extreme caution in this area, with a high level of consultation required before any action is taken in specific water catchments. Even if there is no immediate risk of third party impacts, Cotton Australia would need assurances that a process is in place to deal with any impacts that may occur from increased take in future years. On the balance, Cotton Australia would favour keeping the licencing framework, even if a lower level of administration and compliance was put in place. That would make it a lot easier to address any cumulative impacts in the future.

- In a similar vein, Cotton Australia understands the Government's motivation in moving to self-reading and reporting of meters in unsupplemented systems. However, protection of the irrigators' property right is of paramount importance to our growers. Cotton Australia strongly urges the Government to put in place a rigorous compliance and auditing framework around self-metering, and ensure that any significant non-compliance is dealt with in a very strong but appropriate manner.
- Regarding the take of Groundwater by the resource industry, Cotton Australia has always favoured a fully licenced framework. However, it does see the logic of bringing the requirements faced by the gas industry and the mineral industry into line. Cotton Australia makes the point the "make good" provisions may provide adequate protection to individual water users, but does not by its nature protect the long-term viability of the resource. Cotton Australia will be looking to extend the water resource protection provided under the Regional Planning Interest Act for Regionally Significant Water Sources to other water such as Callide Groundwater.

Thank you for the opportunity to provide these brief comments, which Cotton Australia believes complements QFF's comprehensive submission, and we would be happy to appear before the inquiry if it so desires.

For further information please contact [REDACTED]

Yours sincerely,

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Michael Murray

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