



*Advancing Australian Cotton*

Research Director  
Infrastructure, Planning and Natural Resources Committee  
Parliament House  
George Street  
Brisbane Qld 4000  
via email: [ipnrc@parliament.qld.gov.au](mailto:ipnrc@parliament.qld.gov.au)

18 December 2015

Dear Ms Pasley,

**Re: Water Legislation Amendment Bill 2015**

Cotton Australia (CA) welcomes the opportunity to provide comment on the *Water Legislation Amendment Bill 2015*.

CA is the key representative body for Australia's cotton growing industry. The cotton industry is an integral part of the Australian economy, worth over \$1.25 billion in export earnings in the 2014–15 season, and employing on average 10,000 people. The industry's vision is: *Australian cotton, carefully grown, naturally world's best.*

CA wishes to highlight upfront its disappointment at the failure of the Department of Natural Resources and Mines and Department of Environment and Heritage Protection to include our representative body in the Water Engagement Forum. While we are an active member of the Queensland Farmers Federation, our engagement with the approximately 300 cotton properties across Queensland, who are reliant on irrigation for cotton production, would have placed us in a unique position to provide constructive feedback on the proposed water legislative changes. Failure to be engaged within this process means that we are not able to fully establish the consequences of these changes on our members or the scope of additional amendments to be made to the *Water Reform and Other Legislation Amendment Act 2014*. We would ask that should additional changes be proposed that have potential impacts on existing water licence allocations that CA is engaged in consultation processes.

In light of these comments, CA offers its support for the Queensland Farmers Federation (QFF) submission to the Parliamentary Committee. QFF identifies broad support for the:

- omission of provisions that allow for water development options subject to reservations around issues associated with unallocated water within a catchment or sub-catchment area ; and
- omission of provisions that allow for the declaration of a watercourse, enabling the removal of a requirement for a water licence or permit to access or intercept water that could threaten water reliability for downstream water licence holders.

We note that there are no proposed changes to the groundwater management reforms introduced in 2014 that created a framework for the management of 'associated' and 'non-associated' water take. We urge the Department to continue to its path towards a more consistent and effective management framework that will provide greater certainty for licence holders across the State.

CA seeks clarification regarding the following miscellaneous amendments:

- rules for deciding an application to relocate a water licence can be included in a water plan;
- a water management protocol can state the criteria and process for deciding applications for a seasonal water assignment or for relocation of a water licence where the water plan allows; and
- provision for a water entitlement notice to grant a water licence or water allocation to replace a surrendered water allocation.

These amendments potentially have significant implications for our irrigation licence holders and without consultation we are unsure of the intent of these changes, nor any unintended consequences that may result of this legislative adjustment.

Should you have any questions regarding our submission please do not hesitate to contact me on 02 9669 5222 or [FelicityM@cotton.org.au](mailto:FelicityM@cotton.org.au)

Kind regards,



Felicity Muller  
Policy Officer  
Cotton Australia