



Independent Review Panel,
Third Review of Water for the Environment Special Account
8-8-2025

WESAreview@dcceew.gov.au

Dear Chair and Panel Members, ***Submission by Cotton Australia Limited***

Cotton Australia is the peak body representing the interests of Australia 1,500 cotton growers and our industry's cotton ginnerers.

Most of our cotton producers, both irrigated and rainfed, operate within the Murray-Darling Basin, stretching from the NSW Murray Valley to the Condamine Balonne in Queensland.

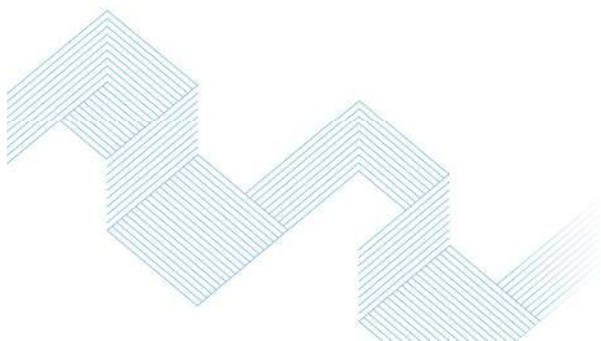
The implementation of the Murray-Darling Basin Plan over the past 13 years has had a huge impact on our irrigators, but even a greater impact on many of our irrigation communities.

Cotton Australia is an active member of National Irrigators Council (NIC), National Farmers Federation (NFF), New South Wales Irrigators Council (NSWIC) and Queensland Farmers Federation (QFF) and endorses the submissions lodged by these organisations.

Due to our membership of the above organisations, and the comprehensive submissions lodged by NIC and NSWIC in particular, Cotton Australia will only be submitting this brief submission.

Scope of the review

1. *This review will build upon the second review by focussing on the period between now and when the second review was completed.*
2. *The review will consider whether the amount standing to the credit of, and to be credited to, the WESA is sufficient to:*
 - a) *increase, by 31 December 2027, the volume of the Murray–Darling Basin (Basin) water resources that is available for environmental use by 450 GL; and*
 - b) *ease or remove constraints identified by the Murray–Darling Basin Authority on the capacity to deliver environmental water to the environmental assets of the Basin.*
3. *In conducting this review, the panel will also consider:*



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- (a) the progress that has been, and is anticipated to be, made towards increasing the volume of the Basin water resources that is available for environmental use;*
 - (b) whether the design of projects in relation to which payments have been made under section 86AD is likely to be effective in increasing the volume by 450 GL of the Basin water resources that is available for environmental use; and*
 - (c) any other matter specified in writing by the Minister that is relevant to achieving the object of this Part.*
4. *In conducting this review, the panel must also consider the effectiveness of the following:*
- (a) payments made, or expected to be made, under paragraph 86AD(2)(c) in relation to a purchase referred to in paragraph 86AD(2)(b);*
 - (b) payments made, or expected to be made, from other sources in relation to a purchase referred to in paragraph 86AD(2)(b).*
5. *The panel may consider if the current WESA policy settings and budget are sufficient to deliver the 450 GL of water to achieve enhanced environmental outcomes and to ease or remove constraints on the capacity to deliver environmental water.*

Cotton Australia' Response

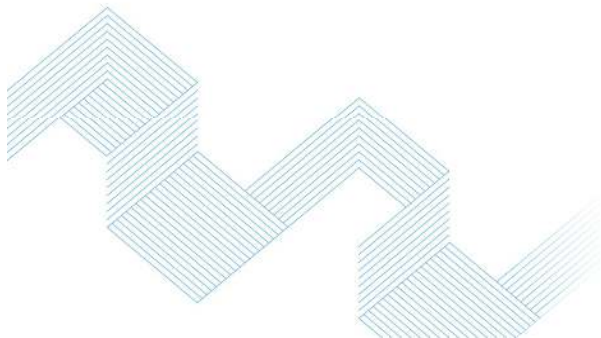
Cotton Australia wishes to express its deepest concerns regarding the appalling lack of information from the Federal Government that has accompanied this call for submissions.

The lack of any single, centralised, formal and transparent update on the current balance in the WESA account, the progress that has been achieved, and estimates on work still required and likely costs is a disgrace, and Cotton Australia can only hope that the Reviewers have full access to comprehensive information on WESA Funds and Achievements, along with valid estimates on likely costs going forward.

Without this information, it is almost ridiculous for an organisation like Cotton Australia to even try to comment on the key issues that are meant to be covered by this Review.

The only conclusion that Cotton Australia can come to is: *this is the Review You Have When You have to Have a Review!!*

Despite these serious misgivings, Cotton Australia will attempt to make some meaningful comment on keys areas of the Review.



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Scope Point 2

The answer to these two questions must be no. It was no, when considered in the first review, it was no, when considered in the second review and it must be no, now.

However, this government has chosen to hide behind “*Commercial in Confidence*” when it comes to reporting on funds available for water purchase. Further, there is absolutely no transparency as to whether, some or all of these “*commercial in confidence*” funds have been used to meet the outcomes required from the WESA funds (as outlined in Scope Point 1), or whether they have been allocated to some other account.

What is clear is that there is at least 300GI more of water entitlement acquisition that is targeted by the government under its 450GI aim, and even if all of WESA’s original funds were still available, it would be inadequate. Even if the government chose to continue its socially and economically damaging path of simply buying water entitlements rather than focusing on funding efficiency measures that would have previously been subject to social and economic neutrality test.

Similarly, with very little progress made on easing constraints, it is hard to see if even if all remaining WESA funds were direct to it, there would be enough funds to achieve the desired outcomes.

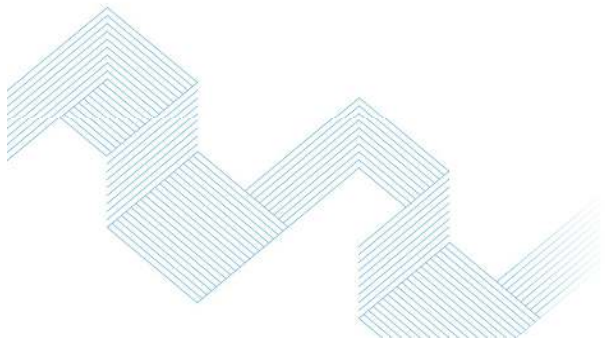
Another example of the appalling lack of government information being provided for this Review, is the complete lack of a formal report on the progress of constraint easing, and the likely expected costs going forward.

Scope Point 3

Again, it is almost impossible to make meaningful input to this part of the Inquiry. While some information has been made available on the progress towards 450GI, this information lacks any financial data and largely lacks any clear information on how the water entitlement was acquired, and at what social and economic cost it was acquired at.

We also note that water that was over-recovered as part of the Bridging the Gap Local recovery targets, has been transferred as progress towards the 450GI target despite that water primarily coming from the Gwydir and Macquarie Valley’s where there is little likelihood of this water contributing to any of the original stated outcomes for the 450GI water.

Further, it is extremely disappointing, and completely against the original intentions of the 450GI program, that the government has been opting heavily for direct water purchase rather than in



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investing in water efficiency projects where the benefits could be shared, and the social and economic impacts reduced significantly.

Scope Point 5

The only conclusion that can be drawn here, unless further information is released, is that the current settings and budgets are inadequate.

Pursing the 450GL, is no more than an exercise in chasing a number. Given extractions under the Basin Plan are consistently well below the amounts allowed under the Sustainable Diversion Limits, acquiring more water is simply not required.

Utilising any remaining WESA funds, on complementary measures, that enhance a holistic approach to managing water for the environment would provide far greater environmental outcomes.

Projects such as removing European Carp, improving fish passage and mitigating Cold Water Pollution all offer great environmental outcomes.

Conclusion

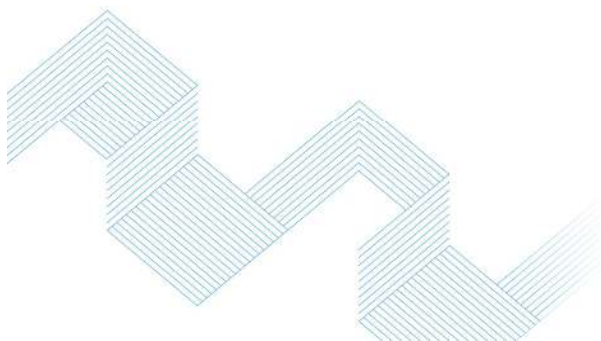
Cotton Australia is extremely disappointed in the government's approach to this Review. Its abject failure to provide an up to date and accurate report on the status and achievements of the WESA Fund as part of this Review package is a clear indication that the government wants this report done, only because it is mandated.

Cotton Australia hope the Panel instead sees this as a genuine opportunity to improve outcomes and ensure a much higher level of environmental outcomes.

Cotton Australia would welcome an opportunity to engage directly with the Panel. Please contact Michael Murray, General Manager Cotton Australia on 0427 707868 or michaelm@cotton.org.au .

Yours sincerely,

Michael Murray
General Manager



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