



COTTON
AUSTRALIA



Northern Basin Toolkit Inquiry
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3-12-2024

Inspector General Of Water Compliance – Northern Basin Toolkit Inquiry

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ABOUT COTTON AUSTRALIA

Cotton Australia is the peak body for Australia’s cotton growers, representing up to 1,500 cotton farms mainly in New South Wales and Queensland but also in the Northern Territory and Western Australia. Cotton Australia works with growers and stakeholders to ensure the Australian cotton industry remains viable.

Cotton Australia supports the Australian cotton industry to be globally competitive, sustainable and valued by the community. It drives the industry’s strategic direction, retains a strong focus on research and development, promotes strength of the industry, manages sustainability reporting and implements policy objectives.

1. Executive summary

- Cotton Australia supports the intent of the Northern Basin Toolkit Measures, and believes it could act as a blueprint for a renewed Basin Plan that is much more focused on environmental outcomes, rather than hydrological flow targets.
- Accessing accurate and timely updates on the overall program, and specific projects, and how those projects link to Toolkit Measures is extremely difficult if not impossible.
- Governance would be greatly improved with the appointment of a overall position with responsibility to and report on projects, regardless of which jurisdiction had day-to-day responsibility for a project.
- The adoption of the previous two dot points, would provide a much improved basis for community understanding and support.
- There should not be too much focus on achieving the 2026 deadline, not to unnecessarily delay completion, but to allow time for the full outcomes to be delivered.

2. Recommendations

- There is a single position created that has overall governance and reporting responsibility for all Toolkit Measures, regardless which jurisdiction has day-to-day responsibility for delivery a project.
- A single website is identified and used, to provide regular and comprehensive updates on the delivery and success for the Toolkit Measures.
- Timeframes should be realistic to delivery they full expected outcomes, and not be governed by a date for date sake.

3. Submission response

Cotton Australia welcomes the opportunity to provide this brief submission to the Northern Basin Toolkit Inquiry.

As the representative of cotton producers in the Murray-Darling Basin, Cotton Australia played an active role in the Northern Basin Review, and welcomed the outcome of the Review, and in particular the recognition that investment in “Toolkit Measures” or as industry often refers to “complementary measures”, as a very positive alternative to simply acquiring more water.

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 submissions lodged by these organisations.

However, for avoidance of doubt, if there is a variation in position between what is in the submissions above, and this submission, the view of Cotton Australia is how it is expressed in this submission.

3.1. GENERAL COMMENTS

Cotton Australia has continuously argued that the greatest single failure of the Murray-Darling Basin Plan was its almost single focus on hydrology – “just add more water and the environment will be fine”.

The inclusion of “Toolkit Measures” was a practical step towards in adopting a more holistic approach and recognising that other investments can leverage greater environmental outcomes from the existing pool of environmental water.

Cotton Australia is strongly supportive of great investment in infrastructure and other activities that will deliver measurable environmental outcomes that will significantly improve riparian health.

Cotton Australia calls on the Australian government to invest up to \$500 million per year over the next four years, into complementary measures such as activities that mitigate cold water pollution out of headwater storages, improve fish passage, remove European Carp, and protect and enhance riparian vegetation.

The outcomes of this Inquiry may well assist in the better delivery of these complementary measures, should Australian governments choose to support them.

In terms of this Inquiry, Cotton Australia remains supportive of the “Toolkit Measures”, recognises that there have been some delivery challenges, and some timelines will be problematic, but governments should “stay the course” and deliver the outcomes, and take learning from this program to deliver complementary measures into the future.

3.2. RESPONSES TO SPECIFIC QUESTIONS

1. For agencies/organisations involved in the implementation of the Toolkit measures, please outline the current status of relevant measures and expected timelines to completion.

N/A

2. What do you consider to be the main barriers (e.g., regulatory, financial, environmental, or social) preventing the timely and effective implementation of projects under the Northern Basin Toolkit? How can these barriers be addressed?

While Cotton Australia has virtually no visibility on actual expenditure to date, it would appear from the breadth of the proposed activities total funding of \$180 million was inadequate, and patently an underrepresent amount in terms of total expenditure on the Basin Plan.

In particular, it must be recognised that any infrastructure projects, such as fishways, fish barrier removals, cold water pollution mitigation is expensive, and funding should be commensurate.

While expensive, it should be also recognised that the adoption of these infrastructure projects is highly likely to deliver greater riparian environmental outcomes, than a similar expenditure on water recovery.

There would also appear to be a significant regulatory/jurisdictional issue that has to be resolved. As a reasonable informed observer, there does not appear to be much co-ordination and active management across the Federal and State Government responsibilities, and this leads to both delays and blame shifting.

A key example of this appears to be the strongly community endorsed projects of upgrades and bifurcation of weirs on the Lower Balonne system. As a community stakeholder I am not aware of the actual status of this project, but there appears to be a lot of finger pointing between State and Federal agencies.

Cotton Australia believes the solution here is to have one clearly appointed lead and spokesperson for a project, regardless of the State and Federal arrangements.

3. For those living in areas directly affected by the Toolkit, how would you describe the level of awareness, understanding, and support within your community for the full implementation of the Toolkit measures? What factors influence this support or opposition?

Cotton Australia operates across the Northern Murray-Darling Basin, and based on its experience it would say awareness is relatively low, and without awareness it is very hard to show understanding and support, even if an activity warrants it.

In preparing this submission Cotton Australia found it impossible to get a definitive update on the overall progress of the Toolkit measures.

There was one reasonable comprehensive update from the Murray-Darling Basin Authority dated August 2023, and numerous other disjointed sites.

It was also very hard to clearly distinguish between what was considered one of the six Toolkit measures, what were projects designed to deliver toolkit measures, and what projects delivered against what toolkit measures.

4. What has been your experience with the delivery of specific projects under the Toolkit program? Have these projects met your expectations in terms of outcomes, timelines, or engagement?

Cotton Australia has been pleasantly surprised by the take-up by growers of the fish screening projects, which has been one of the outstanding successes of this overall programme.

Initial scepticism around the value of screening, and the potential negative impacts screening may have had on pump performance and overall efficiency, has been replaced by a growing awareness of the benefits, both to native fish populations, and pump efficiency, as well as reduced pump maintenance.

It is a project that clearly demonstrates that were a “win-win” can be demonstrated, uptake will be good.

Cotton Australia is aware of some pushback from irrigators and landholders in regards to weir removals, and while not across the details, feels it is likely this is due to a lack of consultation and failure to take into account the needs of landholders.

Cotton Australia is also very aware of landholder disappointment in the Lower Balonne where the highly community supported weir bifurcation projects appeared to be stalled.

5. Do you consider the 2026 deadline for the full delivery of all six Toolkit measures to be realistic and achievable? If not, what alternative timeframe would you suggest, and why?

The 2026 timetable is unrealistic for the full delivery of the toolkit measures, but in the absence of reasonably detailed, and comprehensible project updates Cotton Australia cannot propose a specific completion date.

However, Cotton Australia strongly argues the focus should be less on deadlines, and more on achieving real environmental outcomes, leveraging the available environmental water pool.

It is hoped that one of the key outcomes of this Inquiry will be a comprehensive status report on the projects and their linkages to the Toolkit measures, and the option should be open to allow for new project proposals and/or reevaluation of previously lodged projects.

It is imperative that every effort is put into ensuring the success of projects that deliver real environmental outcomes. The success of the Toolkit Measures should form in a very general sense a blueprint for the next phase of the Murray-Darling Basin Plan, where the emphasis needs to be on environmental outcomes, rather than hydrological targets.

6. *Please comment on the levels of transparency regarding the progress and implementation of the Toolkit. If relevant, please provide details as to how communication, reporting, and access to information be improved.*

Cotton Australia largely covered this in its response to Question 3. In summary, it has been impossible, in the lead up to preparing this submission, to find a single site, with a comprehensive summary of the status of the Toolkit Measures and most importantly the associated projects.

The Murray-Darling Basin Authority did have one report online, that was reasonably comprehensive, but it was over 12 months old.

It is hoped that one outcome of this Inquiry will be a comprehensive update on the status of all projects and how they are linked to specific Toolkit outcomes.

There needs to be a single website, officially responsible for providing detailed updates on the progress of the Toolkit Measures. This site must be able to provide updates, regardless of which jurisdiction as specific carriage of any individual elements.

Without easily found, and easily understandable updates, it is impossible for stakeholders to effectively support the ongoing implementation of the Toolkit Measures, and have confidence on outcomes being achieved.

7. *Please comment on the extent and effectiveness of government agencies' engagement with stakeholders during both the planning and execution phases of Toolkit projects.*

From a Cotton Australia perspective there was some engagement in the early stages, but virtually zero engagement since the start of Covid.

On a number of occasions, Cotton Australia has asked different jurisdictions for progress updates, and these have been provided sporadically. However, without regular, and comprehensive updates, Cotton Australia has not been able to effectively provide effective stakeholder support.

8. *Please comment on the governance and oversight arrangements for the Toolkit, and whether they are adequate to ensure accountability, transparency, and successful implementation.*

Cotton Australia's experience would have to suggest that the governance and oversight arrangements have been inadequate. This has not been assisted by the lack of easily found and understood project updates.

Due mainly to limited information, Cotton Australia is not in a position to assess the relative performance of different jurisdictions, and make specific suggestions for performance.

However, what is definitely required is a single role to have overall responsibility for the delivery of the Toolkit Measures, and the different jurisdictions must be answerable to that role.

4. Conclusion

Cotton Australia remains strongly supportive of Toolkit Measures, or as our industry refers to Complementary Measures. The greatest single failure of the Basin Plan has been its almost single focus of trying to achieve hydrological flow targets rather than trying to achieve environmental outcomes through the adoption of a holistic approach.

It is imperative that the full delivery of the Toolkit Measures remains the paramount outcome, even if it requires the extension of timeframes and the addition of new projects or revisions of old ones.

Further, it is essential that there is regular, comprehensive (although they can be delivered in a summary manner), understandable and accessible through a single site, updates on the projects and achievement towards the Toolkit Measures.

It is also essential that the projects are under the overall governance of one position, regardless of the jurisdiction that may have day-to-day delivery responsibilities.

Improved governance and reporting will improve stakeholder understanding of the overall initiative, and provide an environment for informed and constructive input.



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