



COTTON
AUSTRALIA



**Submission on the Draft
Central Queensland Regional
Water Assessment**

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Submission prepared by

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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 is the peak representative body for Australia's cotton growers, including growers in the Central Highlands and Dawson Valley cotton growing regions within the Central Queensland Regional Water Assessment (RWA) area. This submission responds to the draft Central Queensland RWA released in June 2026 by the Department of Local Government, Water and Volunteers.

Cotton Australia's comments are limited to three matters of particular importance to its members in the region: the proposed options relating to Emerald's town water supply through the Nogoia–Mackenzie Water Supply Scheme, the future management of the Strategic Water Infrastructure Reserve (SWIR) in the Dawson Valley, and while not directly addressed in the Draft Assessment enhanced access to Overland Flow water. Cotton Australia's position reflects feedback provided directly by the Central Highlands Cotton Growers & Irrigators Association (CHCG&IA) and the Dawson Valley Cotton Growers Association (DVCGA), and is consistent with the positions those associations have separately submitted to the Department.

In summary, Cotton Australia supports growth where cost-effective water can be supplied, but has concerns that the draft RWA's preferred option for Emerald's water supply carries unnecessary cost, delivery and reliability risks, and considers that the Dawson Valley's Strategic Water Infrastructure Reserve should remain available to the Valley rather than being redirected elsewhere in the Fitzroy Basin.

Further, there is room under the Review of the Fitzroy Basin Water Resource Plan to increase access to Overland Flow, and Cotton Australia supports further and in-depth consultation on this issue by the Department.

Cotton Australia's recommendations on these three matters are set out in Section 2 below, with supporting detail provided in Section 3.

2. Recommendations

Cotton Australia recommends that the Queensland Government:

1. Secure Emerald's long-term town water supply, if needed, through the purchase of additional urban water allocations through the market, rather than through new dead storage and pipeline infrastructure at Fairbairn Dam, and/or through the adjustment of access rules.
2. Ensure any change to water sharing rules at Fairbairn Dam does not reduce the reliability of Medium or High Priority agricultural water allocations without appropriate compensation.
3. Investigate a supplementary network of groundwater bores as an additional drought-period water security measure for the Central Highlands.
4. Retain the Dawson Valley's Strategic Water Infrastructure Reserve (SWIR) within the Dawson Valley, and rule out its reallocation to other parts of the Fitzroy Basin.
5. If SWIR is released to the General Reserve, do so only through a fair and transparent process that gives all farm businesses a genuine opportunity to compete for that water.
6. If the existing SWIR leasing framework continues, extend lease terms to 10 years to give irrigators greater investment certainty.
7. Continue to investigate infrastructure options in the Dawson Valley that may increase the pool of cost-effective supplemented water.

8. Continue to include Cotton Australia and its regional grower associations, including the CHCG&IA and DVCGA, in all further consultation as the RWA progresses to Phase 3.
9. Further consider, through the Unlocking Water Project and the Fitzroy Basin Water Resource Plan Review, the rules around and available volumes of Overland Flow water, in consultation with growers and other stakeholders.

3. Submission response

Cotton Australia's detailed comments on the two matters within scope of this submission are set out below.

3.1. EMERALD TOWN WATER SUPPLY – NOGOA–MACKENZIE WATER SUPPLY SCHEME

Cotton Australia recognises the importance of domestic water security for Emerald and other regional townships. However, urban water allocations should be based on actual domestic demand aligned to population growth, and should exclude commercial or industrial water use.

Agricultural water users within the Nogoa–Mackenzie Water Supply Scheme do not support any reduction in the reliability of Medium or High Priority water allocations without appropriate compensation.

The draft RWA's acknowledgement that increasing the Critical Water Access level at Fairbairn Dam affects High Priority allocations does not reflect the operation of the scheme: any reduction in available water is first borne by Medium Priority allocations, and therefore affects all water users on the scheme, not only High Priority urban entitlements. It is therefore very important that if this option is considered further, the potential impacts are fully modelled.

Cotton Australia has concerns regarding the proposed dead storage access at Fairbairn Dam and pipeline to Emerald (the \$49 million capital option). Feedback from members indicates this option carries a real risk that the total delivered cost will exceed the \$49 million estimate, that it will generate disputes with landowners along the pipeline corridor, that it will take considerably longer to deliver than a purchase-based alternative, and that it will require ongoing funding for operation and maintenance.

As a more practical and lower-risk alternative, Cotton Australia supports the Central Highlands Regional Council securing its long-term water security through the purchase of additional urban water allocations through the water market, rather than new infrastructure. This approach draws on an existing, mature water market; can be implemented in stages as population and demand actually change; allows the Council to choose between Medium and High Priority allocations according to need; provides the Council with a tradeable or saleable asset; requires minimal additional staff or asset-maintenance resourcing; and does not require any change to water sharing rules or affect the reliability of existing entitlements.

Cotton Australia also encourages the Department to investigate additional options for drought-period water security, such as a supplementary network of groundwater bores, alongside any urban allocation purchase.

3.2. DAWSON VALLEY – STRATEGIC WATER INFRASTRUCTURE RESERVE

Cotton Australia acknowledges the draft RWA's recognition of irrigated agriculture, including cotton, as a key contributor to the Dawson Valley's economy and future growth.

Cotton Australia's primary position is that the Strategic Water Infrastructure Reserve (SWIR) allocated to the Dawson Valley should remain within the Dawson Valley to support the Valley's long-term growth, water security and future infrastructure opportunities. Cotton Australia does not support reallocating Dawson Valley SWIR to other parts of the Fitzroy Basin.

Now in its seventh year of availability, access to SWIR water has spurred economic development across the Dawson Valley, as demonstrated by the addition of up to 10,000 ha of new irrigation development, including storages and pump facilities, and has helped secure the long-term future of the Moura Cotton Gin, which is now regularly processing in excess of 100,000 bales per year, up from approximately 30,000 to 40,000 bales prior to the SWIR water being released, with potential for further growth.

This development has also boosted both on and off-farm employment, as well as expenditure flow through the entire regional economy.

While there is universal support within Cotton Australia for continued access to the water currently available through SWIR, there is a range of views as to how long-term access to that water should best be managed.

Some growers would prefer greater water security by converting that water to supplemented water through investment in cost-effective water infrastructure on the Dawson River system; others would prefer the opportunity to purchase their current SWIR water as permanent unsupplemented water; and others would simply like to see the current SWIR lease term extended to 10 years. The long-term outcome may be a combination of all three.

Cotton Australia therefore supports continued investigation and progression of water infrastructure opportunities within the Dawson Valley, recognising their potential to improve long-term water security, support agricultural productivity and support sustainable regional economic growth.

Cotton Australia acknowledges the success of the existing SWIR leasing program in the Dawson Valley, which has given irrigators the confidence to invest in their farm businesses while keeping the water available for future strategic use.

Should the Queensland Government consider converting SWIR water to General Reserve water for permanent allocation, Cotton Australia recommends that sufficient SWIR be retained within the Dawson Valley to support future growth and preserve the opportunity to build future strategic water infrastructure. Should any SWIR be released to the General Reserve, this should occur through a fair and transparent allocation process that gives all farm businesses a genuine opportunity to compete for that water, regardless of size or corporate structure.

Alternatively, should SWIR continue to be managed under the existing leasing framework, Cotton Australia strongly supports the continuation of the SWIR leasing program, and recommends the Department consider extending lease terms to 10 years. This would give irrigators greater certainty and encourage long-term investment in their farm businesses, while maintaining the strategic intent of the reserve.

3.3. OVERLAND FLOW

While not specifically covered in the draft Assessment, Cotton Australia calls on the Department, as part of this Assessment, and as part of the Unlocking Water Project and the Fitzroy Basin Water Resource Plan Review, to further consider the rules around, and available volumes of, overland flow water. This water can be a very cost-effective economic multiplier. Cotton Australia recognises that any access must be made in an environmentally sustainable way, but supports greater consultation with growers and stakeholders on what may be possible.

4. Conclusion

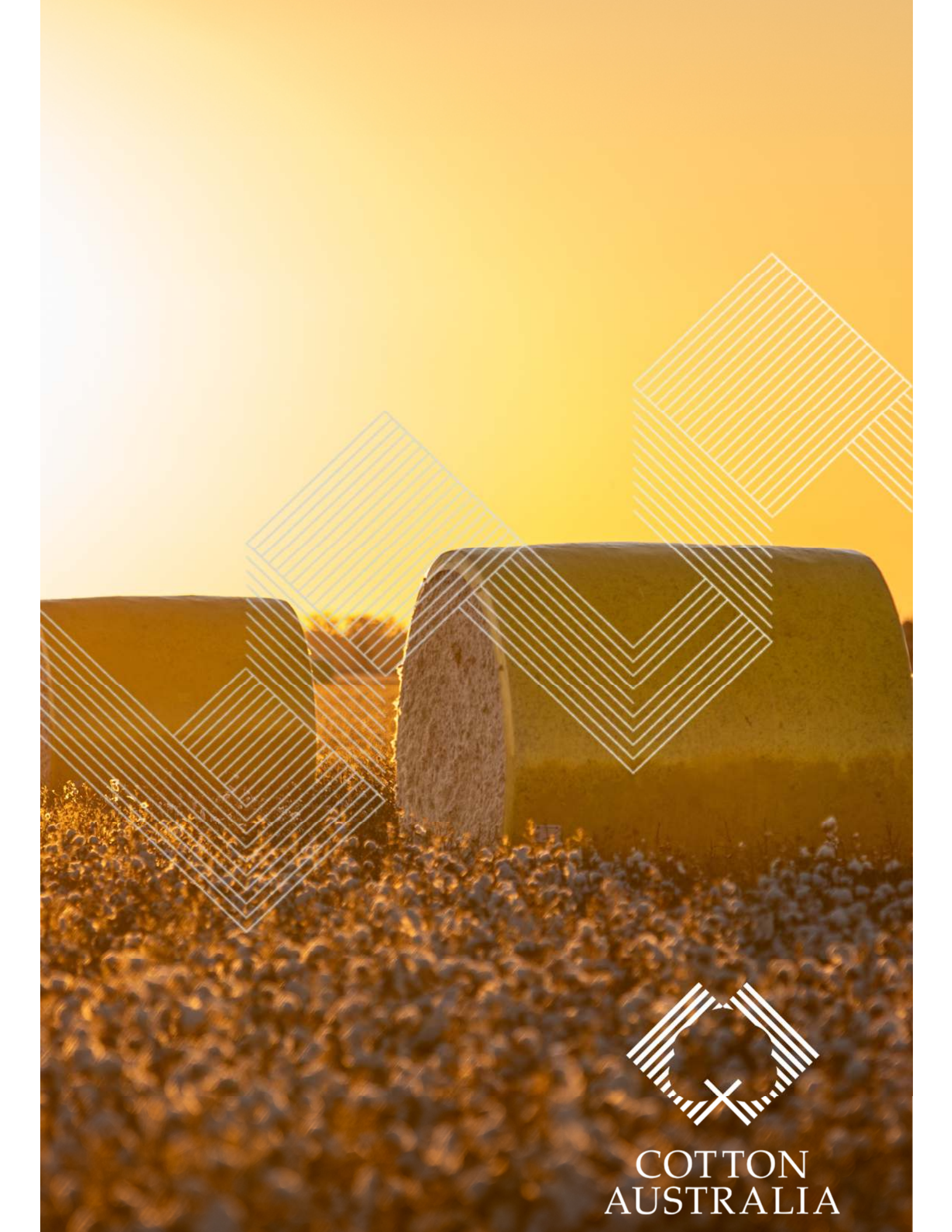
Implementing the recommendations set out in Section 2 — including securing Emerald’s water supply through allocation purchase rather than new pipeline infrastructure, building on the Dawson Valley’s Strategic Water Infrastructure Reserve, and further considering access to Overland Flow water — would directly address Cotton Australia’s key concerns with the draft RWA.

Cotton Australia acknowledges that the Central Queensland RWA remains in draft form and supports ongoing consultation and refinement of the modelling underpinning it, to ensure the options ultimately progressed to Phase 3 are evidence-based, practical and reflective of regional conditions.

Cotton Australia thanks the Department for the opportunity to comment and looks forward to continued engagement with the Department, the CHCG&IA and the DVCGA as the assessment progresses. Questions about this submission can be directed to Michael Murray, General Manager, at michaelm@cotton.org.au.



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