



COTTON
AUSTRALIA



**Draft NSW Unregulated Water
Sharing Plans**
Michael Murray, General Manager

Draft NSW Unregulated Water Sharing Plans

Submission prepared by – Michael Murray, General Manager

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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 body representing Australia 1,500 cotton growers, of which approximately two-thirds operate within NSW, and the majority are irrigators holding a wide variety of water entitlements including entitlements issued for Unregulated Water Sources.

Cotton Australia welcomes this opportunity to provide this brief over-arching submission, covering aspects of the seven unregulated water sharing plans currently on public exhibition in New South Wales.

Cotton Australia is an active member of the New South Wales Irrigators Council, and as such endorses its more detailed submission on these plans.

Further, Cotton Australia has a close working relationship with the valley-based irrigator representative bodies such as Gwydir Valley Irrigators Association, Namoi Water, Lachlan Valley Water, Macquarie Valley Food and Fibre, Border Rivers Food and Fibre and Barwon Darling Water.

Cotton Australia will not be focusing on specific draft unregulated water sharing plans in this submission and urges the New South Wales (NSW) government to pay particular attention to the submissions lodged by valley-based irrigator groups as they have a high degree of local knowledge and understand the significance of these plans and the proposed changes to their entitlement holders.

Cotton Australia believes further consideration is required in the following key areas.

- The identification and gazetting of wetlands
- The gazetted Wetlands in the Border Rivers Unregulated Water Sharing Plan.
- Greater detail and certainty around the development and inclusion of volumetric Long Term Annual Average Extraction Limits (LTAAELS)
- Ensuring the implementation of Individual Daily Extraction Components (IDECs) does not unfairly discriminate against any irrigator

2. Recommendations

1. Provide a three-year period to allow for the proper identification of (including an appeals process) of Wetlands, prior to the formal inclusion into any of the Plans.
2. Re-open the identification and gazetting of Wetlands in the Border Rivers Unregulated Water Sharing Plan, to allow for full consultation with impacted landholders and the inclusion of only genuine Wetlands
3. Delay a decision on the adoption of volumetric LTAAELs until a methodology has been finalised, through a process that includes full and genuine consultation with entitlement holders and their representatives, and the implications are fully understood.
4. Undertake a review of IDECs in the Barwon-Darling, and rectify any anomalies, and utilise the learnings from the Barwon-Darling prior to implementing IDECs in any other water sharing plan.

3. Submission

Cotton Australia is the peak body representing Australia's 1,500 cotton growers, with approximately two-thirds operating in NSW. The majority of these producers are irrigators, and collectively they hold a wide array of licence entitlements including unregulated entitlements covered by these seven plans.

Cotton Australia acknowledges that Unregulated Water Sharing Plans are not new, and these draft plans are renewals, and in many respects do not represent huge changes, and in some areas represent an improvement over the existing plans.

Cotton Australia is an active member of the New South Wales Irrigators Council, and as such endorses its more detailed submission on these plans.

Further, Cotton Australia has a close working relationship with the valley-based irrigator representative bodies such as Gwydir Valley Irrigators Association, Namoi Water, Lachlan Valley Water, Macquarie Valley Food and Fibre, Border rivers Food and Fibre and Barwon Darling Water.

Cotton Australia will not be focusing on specific draft unregulated water sharing plans in this submission and urges the New South Wales (NSW) government to pay particular attention to the submissions lodged by valley-based irrigator groups as they have a high degree of local knowledge and understand the significance of these plans and the proposed changes to their entitlement holders.

Cotton Australia believes further consideration is required in the following key areas.

- The identification and gazetting of wetlands
- Reviewing the gazetted Wetlands in the Border Rivers Unregulated Water Sharing Plan.
- Greater detail and certainty around the development and inclusion of volumetric Long Term Annual Average Extraction Limits (LTAAELS)
- Ensuring the implementation of Individual Daily Extraction Components (IDECS) does not unfairly discriminate against any irrigator

3.1. THE IDENTIFICATION AND GAZETTING OF WETLANDS

Cotton Australia is very aware of widespread concern that areas have been identified as wetlands, when they are simply not wetlands. Either they never were, or the landscape has changed so significantly that it is ridiculous to consider them current wetlands.

Cotton Australia has done a quick review of some of the interactive maps that have been provided as part of this Exhibition of Draft Plans, and the most cursory look easily identifies sites they cannot be in anyway considered a wetland.

While Cotton Australia cannot be definitive of the methodology used by the Department to identify these wetlands, it strongly suspects it was done as a desktop exercise, using some dubious online tool, with zero ground truthing.

Further, it would appear the Department has done little or anything to directly inform each and every impacted landholder and provide clear guidance on how the inclusion of any "suspect" wetlands can be reviewed.

The inclusion of the highly suspect wetlands has further "bruised" whatever credibility the Department had managed to retain in the areas of consultation and water sharing plan preparations "

Cotton Australia strongly recommends that the Draft plans be amended to: *Provide a three-year period to allow for the proper identification of (including an appeals process) of Wetlands, prior to the formal inclusion into any of the Plans.*

Further, Cotton Australia recommends *that the Border Rivers 2024 Unregulated Plan is reopened to allow the proper identification and gazettement of Wetlands in the Border Rivers Unregulated Water Sharing Plan, allowing for full consultation with impacted landholders and the inclusion of only genuine Wetlands*

3.2. VOLUMETRIC LONG TERM AVERAGE ANNUAL EXTRACTION LIMITS (LTAAELS)

Cotton Australia concedes that there may be benefits in the establishment of volumetric LTAAELS, however, under the current draft plans, entitlement holders are being asked to sign up to something that is no more than a concept.

Entitlement holder trust would be enhanced if the Plans were amended to allow for a decision as to whether to adopt a volumetric LTAAEL or not was only taken after the methodology was finalised, following fully consultation with entitlement holders and their representatives, and all stakeholders had been given the opportunity to provide feedback on any likely implications.

Delay a decision on the adoption of volumetric LTAAELs until a methodology has been finalised, through a process that includes full and genuine consultation with entitlement holders and their representatives, and the implications are fully understood.

3.3. INDIVIDUAL DAILY EXTRACTION COMPONENTS (IDECs)

While the inclusion of IDECS can enhance the fair sharing and management of water, the history of their implementation in the Barwon-Darling has demonstrated that inequities and mistakes can arise.

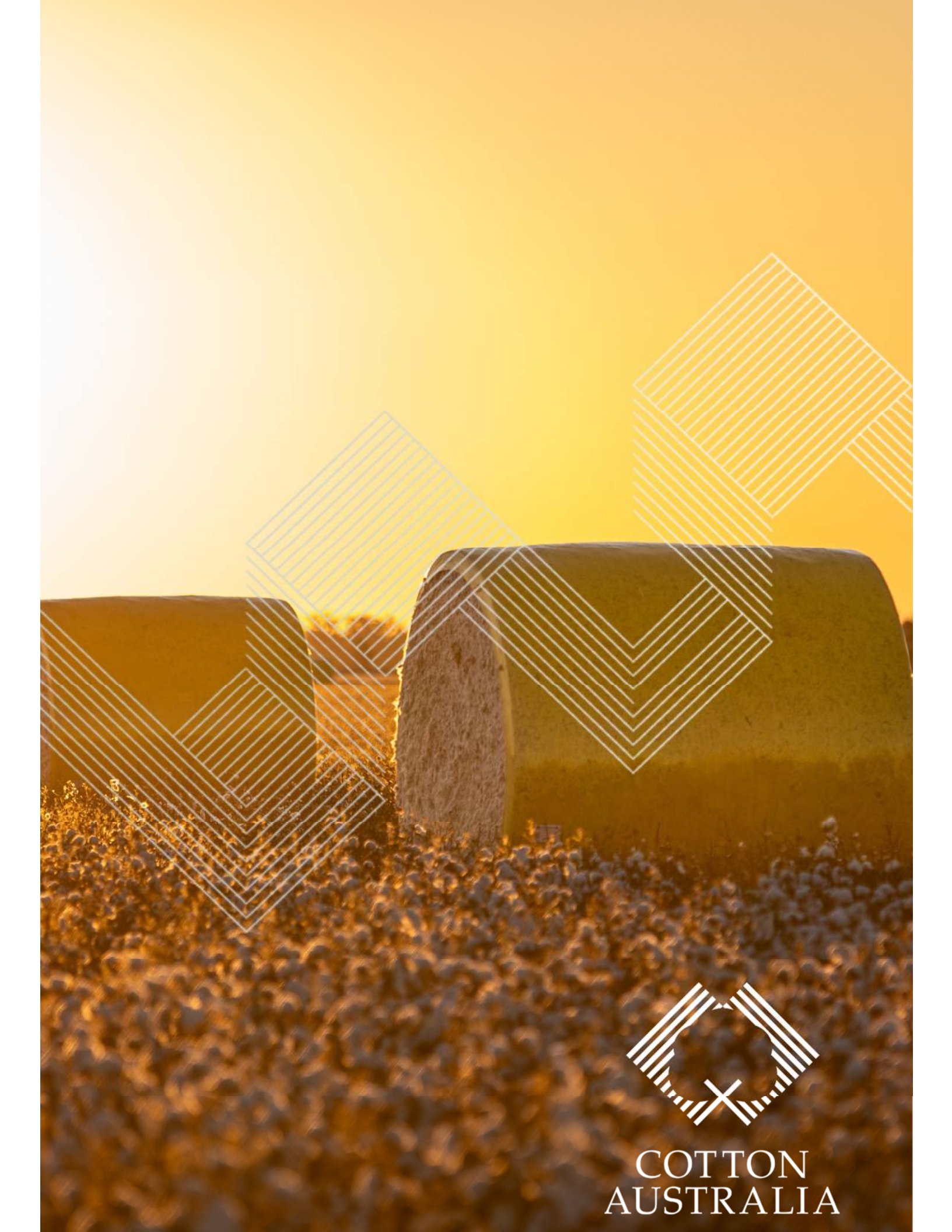
Cotton Australia recommends the Department give particular attention to the Barwon-Darling Water submission in regards to this issue, and ensure the lessons learnt are adopted if IDECS are issued in other plans, and a process is put in place to rectify inequities in the Barwon-Darling.

Undertake a review of IDECs in the Barwon-Darling, and rectify any anomalies, and utilise the learnings from the Barwon-Darling prior to implementing IDECs in any other water sharing plan

4. Submission

Cotton Australia appreciates this opportunity to make this brief submission, and once again urges the Department to take particular regard to the more detailed submissions lodged by valley-based irrigator groups.

For further information on this submission please contact Michael Murray, General Manager, Cotton Australia – michaelm@cotton.org.au or 0427 707868.



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