



Advancing Australian Cotton

The Chief Executive
Attn: Border Rivers Moonie Water Plan Coordinator
Department of Natural Resources, Mines & Energy
PO Box 318
Toowoomba QLD 4350

1-6-2018

The Chief Executive,

SUBMISSION TO MAKE AMENDMENTS TO;
) Draft 2019 Water Plan (Border Rivers and Moonie), and the,
) Draft 2019 Water Management Protocol (Border Rivers and Moonie).

Cotton Australia is the peak body representing the interests of cotton growers and ginners across Australia.

The Australian cotton industry contributes between \$1.5 billion and \$2.8 billion (farmgate) of export income to the Australian economy each year. Approximately one third of Australia's production occurs in Queensland, with a significant portion of this being produced in the area covered by these two documents.

The Australian Cotton industry prides itself on its high standards, and absolutely accepts the need for sound water management regulation, matched with robust and transparent compliance systems.

It is recognised that the Draft 2019 Water Plan (Border Rivers and Moonie) and the Draft 2019 Water Management Protocol (Border Rivers and Moonie), represents a significant contribution to that sound water management system within Qld, and will be a critical component to the Murray-Darling Basin Plan's Water Resource Plan for this catchment.

Cotton Australia is a member of the Queensland Farmers Federation (QFF) and has very strong working relationship with Border Rivers Food and Fibre (BRFF). In addition the Mungindi Cotton Growers Association is a key member of Cotton Australia.

Cotton Australia endorses the submissions of the above organisations, and urges the Queensland Government to pay careful consideration to the detailed issues that have been raised in the submissions by the above organisations.

Further, we ask you to engage directly with them, to ensure that the issues raised are resolved in a transparent manner.

Cotton Australia does not intend to duplicate the level of detail that is covered in the above submissions but does draw the government's attention in particular to:

- J Multi Year Accounting (MYA) – S (39) Page 18 (Draft Water Management Protocol)
Cotton Australia is aware of the significant concerns held by irrigators about the application of Multi-Year-Accounting, and its potential impact preventing irrigators from extracting to the limit under the Murray-Darling Basin Plan.

- J Water Licences To Take Overland Flow Water –S (59) Page 41 (Draft Water Plan).
Irrigators are understandably very worried about any changes that have the capacity to reduce their ability to access water that they have had a historical and legal right to. This is a clause that requires far more consultation to ensure that there are no unintended consequences, and if there are to be reductions that they are duly compensated for. This matter is also hard to resolve at the moment, as the Qld Government's soon to be released response to the Independent Metering Audit report is likely to recommend changes to the way overland flow is managed and reported.

Cotton Australia's thanks you for the opportunity to make this brief submission, and once again urges you to consult further with groups such as the Mungindi CGA and Border Rivers Food and Fibre.

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

Yours sincerely,



Michael Murray,
General Manager