



3.05.2024

Ms [Joanne Chong](#)  
Commissioner  
Productivity Commission

3/5/24

**RE: National Irrigators' Council feedback on the Productivity Commission's National Water Reform Interim Report**

Dear Commissioner,

Cotton Australia represents the interests of Australia's 1,500 cotton growers, all of whom rely on water, and many of whom are irrigators.

Collectively they can generate in excess of \$4 Billion (farmgate) for the Australian economy, although actual production varies enormously depending on seasonal conditions.

While the majority of our growers operate within the Murray-Darling Basin, a significant number farm and irrigate across Central Queensland, and in recent years we have seen an emergence and in some cases a re-emergence of our industry across Northern Australia including in North Queensland, the Northern Territory and in the Ord River area of Western Australia.

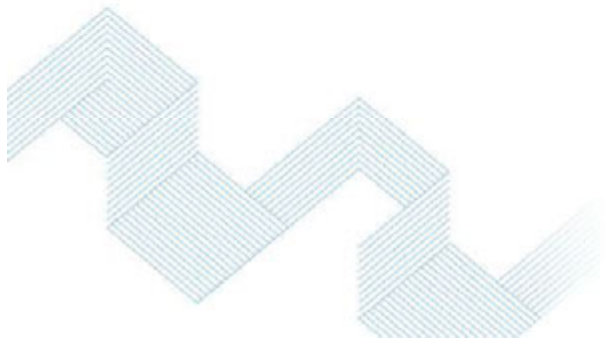
Cotton Australia is an active member of the National Irrigators Council (NIC), National Farmers Federation (NFF) New South Wales Irrigators Council (NSWIC) and the Queensland Farmers Federation (QFF), and Cotton Australia endorses their submissions.

Given the extensive submissions of at least some of the above organisations, Cotton Australia will only be providing a brief submission, highlighting key issues. In the event that there is any divergence in the views expressed by the other organisations and what appears here, the position of Cotton Australia is the one expressed here.

**PRODUCTIVITY COMMISSION'S NATIONAL WATER REFORM INTERIM REPORT**

Cotton Australia does support the renewal and refresh of the National Water Initiative (NWI) (rather than what appears to be a view of government to develop a brand-new National Water Agreement (NWA).

A renewed NWI should fully recognise the importance of agriculture, as well a supporting significant recognition of First Nations involvement.



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### First Nations Involvement

First Nation views must be fully represented, but they should not have a higher priority than any other stakeholder group.

It is also very important that government takes very early and clear steps to demonstrate what enhancing indigenous water involvement may or may not mean.

For example, while Cotton Australia is no expert on native title, it is our understanding that native title claims on water in terms of extraction rights, is extinguished when legally granted entitlements are issued. If this is correct, then clear public statements confirming this, may reduce any unnecessary angst arising during the development of the renewed NWI.

It needs to be clear that additional water for indigenous interests must be achieved through the market, through existing indigenous reserves, or where available through unallocated water, it cannot come at the expense of reliability for existing entitlement holders.

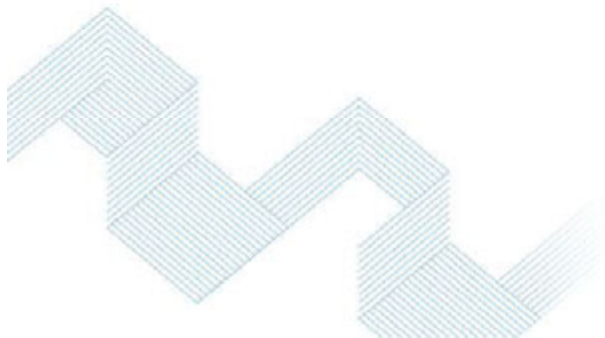
### Climate Change

In regard to taking into account climate change implications, this is important, but it should start with a recognition by all stakeholders, that current water sharing/resource plans already take into account climate change, by not allocating fixed amounts, but by sharing water from the available pool (which can vary greatly with seasonal conditions). Under the current arrangements, the greatest risk of climate change are borne by those entitlement holders that hold lower reliability water such as general security, water harvesting, supplementary, medium priority and unregulated. Full recognition of this would allow the debate to progress in a much more truthful manner.

### Metering

While not wanting to disadvantage any irrigator who has been able to navigate the significant challenges that have been involved in meeting the requirements of AS4747 metering, there remains a need for a review of the necessity of apply this standard, which in some cases appears to be not only cost-prohibitive, but at least some meters meeting the standards are proving incapable of operating in the Australian environment.

There have been cases where meters that meet the main requirements of being accurate to +/-5%, have a data logger and are capable of telemetry have failed to gain accreditation because they cannot accurately measure potable water, yet by all reasonable judgement they can do the job in water containing soil particles etc (the vast majority of river water), and the actual units have a demonstrated ability to withstand the Australian environment.



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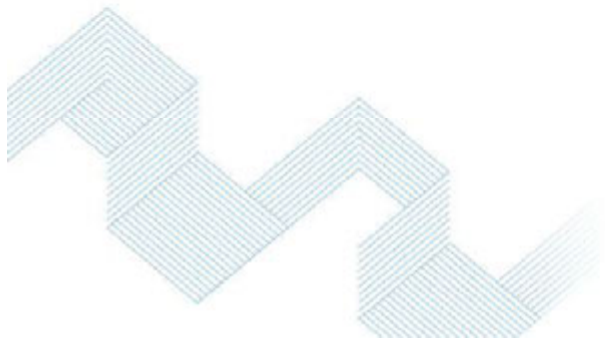
AS4747 metering may have sounded like a good idea at the time, but it is proving to be very expensive, providing no apparent benefit, and in many cases incapable of sustained operation in the Australian environment.

To be very clear, Cotton Australia supports accurate and transparent metering, it is just not convinced that being tied to AS4747 is the most effective way to achieve this.

Cotton Australia would be happy to discuss the submission further. Please contact Cotton Australia General Manager Michael Murray.

Yours sincerely

Michael Murray,  
General Manager



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