



Advancing Australian Cotton

5-4-2018

**Inquiry into the management and use of Commonwealth environmental water,
The House of Representatives Standing Committee on the Environment and Energy,**
PO Box 6021
Parliament House
Canberra ACT 2600

Environment.Reps@aph.gov.au

Dear Mr Andrew Broad, MP, **Re: Management and Use of Environmental Water**

Introduction

Cotton Australia is the key representative body for Australia's cotton growing industry. Our industry is primarily, but not exclusively, located in the Murray-Darling Basin. It is a significant user of our nation's water resources, and it is justifiably proud of its water management, and its focus on being as efficient with this important resource as possible.

Our growers have endured over 25 years of significant water reform. While recognising the absolute importance of maintaining a healthy riparian environment, they also have an expectation that officers such as the Commonwealth Environmental Water Holder and her associated Office are also focused on optimising the efficiency of environmental water use.

Cotton Australia is an active member of the National Farmers Federation (NFF), National Irrigators Council (NIC), NSW Irrigators Council (NSWIC) and Queensland Farmers Federation (QFF) and endorses their submissions to this Inquiry.

In light of the comprehensive submissions being lodged by the above organisations Cotton Australia will keep its submission brief. We welcome the opportunity to speak on behalf of cotton growers on this issue.

Key Issues

Complementary Measures

Cotton Australia has always held the belief that one of the major disappointing aspects of the Murray-Darling Basin Plan was its near sole focus on hydrology – effectively just add more water and problems will be automatically solved.

Rarely is any problem solved with a single focus solution. Instead we have always strongly advocated for multiple solutions, also that these will leverage further gains from the environmental water currently available to the Commonwealth Environmental Water Holder (CEWH) and other managers of environmental water.



Cotton Australia notes that the NIC submission (and others) provides significant detail on numerous complementary measures, although its list is in no way exhaustive.

It should be noted that when the then Murray-Darling Basin Commission/Authority did its Sustainable River Audits, in almost all catchments the best performing indicator was hydrology. The audits in comparison found areas of poorer performance included turbidity, fish, vegetation, macroinvertebrate, and physical form.

These results alone strongly suggest that really environmental improvement will only occur when a multi-faceted approach is taken.

A key factor in the recently rejected Northern Basin Review amendments was the adoption of a range of “toolkit” and/or “complementary” measures. If accepted these would have gone a long way towards improving environmental outcomes.

Cotton Australia would recommend the Inquiry seeks the advice of MDBA Board Member Professor Barry Hart, who closely oversaw the development of the Northern Basin Review recommendations, and could provide expert advice on the proposed “toolkit” measures.

While not being an expert in this area, Cotton Australia would recommend priority complementary measures should include:

-) Removal of European Carp
-) Mitigation of cold water pollution
-) Improved fish passage
-) Improved fish habitat

Cotton Australia recommends that the CEWH uses all opportunities available to her, to leverage environmental gains by adopting complementary measures.

Trade of Environmental Water

Cotton Australia supported and welcomed the changes to Section 106 of the Water Act to allow the CEWH to more easily trade environmental water and to use the proceeds to fund either further water acquisitions or environmental activities.

The CEWH is effectively Australia’s largest irrigator, currently holding in excess of 2,650Gl of irrigation entitlement, with still more to be acquired under the Basin Plan.

Like an irrigator, the CEWH specific water needs will vary from year to year, and valley to valley. The CEWH should be free to nimbly trade water allocations and entitlements, as well as then allocate the overall resource to the best use.

The ability to invest in environmental activities is one way that complementary measures (as discussed above) could be funded.



Management of Environmental Flows

Cotton Australia has long been concerned about what appears to be a strong presence of duplication between the Murray-Darling Basin Authority (MDBA) and the CEWH, when it comes to setting environmental watering priorities.

Cotton Australia contends while the MDBA has had the role of determining how much water should be available to the environment; the CEWH should have the responsibility of determining how the Commonwealth owned water is managed.

Having said that, Cotton Australia also believes that the efficient management of environmental water by the CEWH can only be achieved when that management is done in full co-operation with other holders and managers of environmental water.

Cotton Australia commends the CEWH's participation Environmental Water Advisory Groups (EWAGS) that operate in NSW and provide catchment level advice.

Cotton Australia strongly believes that the CEWH and other managers of environmental water have a responsibility to clearly communicate to communities prior to, during and after environmental releases.

That is, the purpose/expected environmental outcome from a release should be specifically communicated. The progress to achieving the specific outcome/s should be also communicated, and the actual outcomes should be objectively measured and reported on. All three elements need to occur to keep the community informed.

This of course requires the environmental manager to be adequately resourced to properly monitor and evaluate the outcomes from a flow.

Protection of Environmental Flows

Since the screening of the Four Corners programme "Pumped" in late July 2017, there has been considerable focus on the management of environmental water, particularly on the Barwon-Darling.

Cotton Australia has been very disappointed in much of the media reporting and general commentary.

To be clear, Cotton Australia has zero tolerance for water theft. We are aware of ongoing legal action that concerns potential water theft and/or meter tampering, these matters are properly dealt with by the authorities and the courts. However, we should all bear in mind that at this stage the allegations remain allegations, and those named should be afforded the assumption of innocence until proven otherwise.

However, the media and commentators, have on many occasions skated on very thin ice, alleging (and/or seriously implying) that there has been illegal take of environmental water on a grand scale.

In simple terms, the imputation is that irrigators have been accessing water on a grand scale that had been purchased for the environment.



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It is absolutely critical for everyone considering this issue to understand a few of the facts.

-) On an unregulated river such as the Barwon-Darling access to water flows is primarily determined by river gauge measurements. That is when a river height flow target is hit upstream (and maintained downstream) then the irrigator is legally able to pump.
-) Currently, the source of the water, or its purpose, does not affect access.
-) Total take is controlled and this is through the long-term water sharing plan rules and account limits.

Further, it is essential that everyone acknowledges that when the Commonwealth Government purchased water entitlement either on the Barwon-Darling, or its tributaries it was fully aware of these rules, and therefore the challenges it imposed on protecting any particular flow.

Consequently, it is incredibly disrespectful to entitlement holders to impugn that they are currently getting at worst an illegal benefit out of environmental flows, or at best an immoral benefit.

However, Cotton Australia understands that there is a general acceptance that the current arrangements are not considered adequate and there is a community expectation of better protection for environmental flows.

Cotton Australia is aware that a number of irrigation entitlement holders on the Barwon-Darling are prepared to enter into genuine negotiations around how better protection individual flow events, when access is only being triggered by the presence of environmental water.

Cotton Australia supports these respectful negotiations, providing everyone recognises that entitlement holders are currently operating within the rules, and those rules were clearly understood at the time the Commonwealth purchased the water entitlements.

Conclusion

Cotton Australia thanks the Inquiry for the opportunity to make this brief submission, and would be delighted to appear before the Inquiry if it would like further information on any of the points we have raise.

Please contact Michael Murray, General Manager, Cotton Australia ([REDACTED]) or [REDACTED] for further information

Yours sincerely,

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Michael Murray,
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