



19th November 2012

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

Re: Surat Basin and Bowen Basin coal producers' application for authorisation A91338 – interested party consultation

Thank you for the opportunity to make a submission in regard to this matter. Cotton Australia is a member of the Queensland Farmers Federation which has also provided a submission which is endorsed by Cotton Australia.

The Dawson Valley is an important cotton growing area, and the industry has been a supporter of numerous Nathan Dam proposals of the past decades, on the basis that those proposals offered the opportunity of increased irrigation water availability/ and or reliability.

However, the current proposal quite specifically rules out additional water for irrigation, and will indeed have a negative impact on the reliability of some irrigators.

It has been greatly disappointing that SunWater has almost completely ignored irrigators with this proposal, with close to no consultation with local entitlement holders, and no negotiations as to how any negative impacts will be mitigated or compensated.

Therefore, Cotton Australia cannot at this stage support the current Nathan Dam proposal, and is extremely wary of the proposal to allow the mining companies to act in a “cartel” like manner.

Specifically, Cotton Australia is concerned that in any arrangement, irrigators must be protected from any negative impact on their water entitlements and reliability, their ability to trade, and their SunWater water charges.

Cotton Australia recommends that the ACCC does not approve “cartel” like arrangements, unless and until, satisfactory arrangements are in place to ensure there are no short or long-term negative impacts on irrigators water rights.

Yours sincerely,

Michael Murray,
National Water Policy Manager,

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