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# **SUBMISSION**

## **IPART Discussion Paper WaterNSW Rural Valleys Pricing Review**

**November 2025**



## Executive Summary

New South Wales Irrigators' Council (NSWIC) welcomes the opportunity to make a submission to the Independent Pricing and Regulatory Tribunal (IPART). We also request the opportunity to discuss our submission in person with IPART.

NSWIC submits the following:



The critical and comprehensive analysis of the fundamentals of WaterNSW's business model, needed to inform appropriate price determinations, is undertaken over a sufficient period before IPART make a lengthier price determination. (See *Section 1.1 Purpose of review.*)



IPART review the application of the Impactor Pays principle, including revising:

- a. the *counterfactual scenario* to ensure a more accurate assumption underpinning the Impactor Pays principle being applied (See *Section 3.1 Impactor Pays Principle.*)
- b. the resulting cost share ratios to reflect appropriate and fair allocation of cost impact. (See *Section 3.3 Cost Shares.*)



NSWIC recommends a two-year determination capped at CPI, paired with an extended review for deeper scrutiny of WaterNSW's budget and cost-shares. NSWIC only supports a longer-term determination if IPART has sufficient certainty that its prices and cost shares reflect the true and appropriate cost burden and has sufficient confidence in WaterNSW's efficient costs.



IPART maintain the existing valley-based pricing structure, the community service obligation (CSO) for North and South Coast regions and the Irrigation Corporation District Rebates. (See *Section 4 Pricing Review.*)



Reject regional/aggregated valley pricing proposals. (See *Section 4 Pricing Review.*)



Stakeholders are provided a further opportunity to provide input, following the release of the expert consultant assessing WaterNSW's base operating costs and before the price determination is finalised.

## Introduction

NSWIC sees this review as a valuable opportunity to reset the approach to cost-shares and the impactor-pays principle, especially as it applies to ageing, legacy water infrastructure. NSWIC has been highly critical of the current pricing model, which is increasingly shifting the cost of non-commercial, policy-driven activities onto licence holders, rather than recognising that many of these investments reflect evolving social expectations that should be funded by society as a whole.

Over recent decades, community expectations around water management have changed markedly, with growing emphasis on matters including cultural flows, fish passage, connectivity and flood mitigation. These requirements were not contemplated when most major dams and delivery assets were constructed, yet the costs of retrofitting works to address them (including measures such as cold-water pollution controls and fishways) are now largely borne by licence holders, who already pay more than 80 per cent of the costs associated with many of these programs.

NSWIC considers that the current impactor-pays framework is ill-suited to historical, long-life assets - it assumes that irrigators can simply “walk away” if impactor costs become excessive, ignoring the reality that this would strand major public assets and undermine regional economies. For genuinely new investments, impact-mitigation costs can and should be built into the upfront business case so investors can decide whether those costs are justified, but retrospective re-allocation of societal expectations onto existing users is neither efficient nor equitable.

IPART’s review should also acknowledge that its counterfactual of “a world without high consumptive water use” is flawed for legacy infrastructure, and that cost-shares need to be re-aligned to reflect both historical realities and contemporary public benefits. Water infrastructure would have been built regardless of irrigation, given its roles in town water security, flood mitigation, tourism, recreation and regional development. Yet, these broad benefits are not adequately captured in the current pricing model.

NSWIC sees that full cost recovery from irrigators is not possible or appropriate under the current cost-shares and policy load, and that activities delivering wider social, cultural and



environmental benefits should be transparently funded as such by the NSW Government on behalf of the broader community. We encourage this review to step away from its interpretation of impactor pays for historical assets and instead adopt a contemporary starting point that recognises today's shared benefits and responsibilities.

Given the strategic importance of water infrastructure to NSW's economy, environment, and communities, the current trajectory of funding risks undermining this critical asset base. While government recognises dams and associated infrastructure as foundational to the state's wellbeing, it paradoxically continues to treat them as mere privately financed inputs rather than critical public goods.

This contradiction lies at the heart of water pricing challenges. Water is deeply regulated due to its unique social and environmental value, yet NSW's pricing model treats water infrastructure as an ordinary economic input, subject to full cost recovery by licence holders alone. This creates an unsustainable dynamic where the broader public benefits embedded in infrastructure investment are not explicitly recognised or funded by the general public.

The risks of this model were made clear by WaterNSW's unaffordable price proposals in late-2024. NSWIC sees that we cannot put the viability of irrigated agriculture and the regional towns they underpin on the line with this unrealistic pricing model. We believe IPART should use this review to re-examine these assumptions and find a lasting solution to affordability and the ongoing sustainability of NSW regulated rivers.



# NSW Irrigators' Council Responses

## 1. General IPART Review

### 1.1. Purpose of review

#### NSWIC Submission

NSWIC submit:

1. IPART should review WaterNSW's business activity, core commercial services versus non-commercial services, the associated costs and revenue requirements, the MDBA and BRC charges, customer demand forecasting and form of control, with due consideration given to the affordability and the social impact of prices.

NSWIC notes a significant amount of analysis is needed to inform an appropriate price determination, which requires sufficient time. This comprehensive review should allow for deeper analysis and address broader structural issues, including ensuring:

- Water users not paying for new activities and obligations added to the WaterNSW operating licence and opaque regulatory requirements without WaterNSW working with customers to respond in an efficient manner, adding to costs.<sup>1</sup>
- Future pricing decisions for rural valley customers are grounded in the principles of efficiency and transparency.

Whether this review is conducted in the current pricing review (through to July 2026), or in the coming years, NSWIC believes understanding the findings from this work are critical before a longer determination period is adopted.<sup>2</sup>

2. IPART review the application of the impactor pays principle (see Figure 1) in setting cost shares, including:
  - the appropriateness of the current counterfactual model in determining the impactor(s) of costs.
  - the proportion of impact assigned to 'impactors', and the resulting cost-share ratios.

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<sup>1</sup> Organisations such as WAMC, NRAR, MDBA and NRC are imposing obligations and responsibilities on WaterNSW that are driving a higher cost base.

<sup>2</sup> See Section **Error! Reference source not found. Error! Reference source not found.** for further detail.

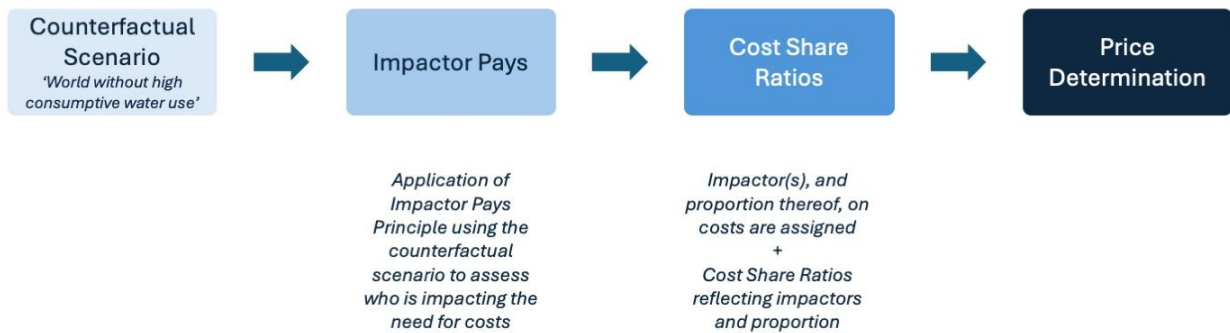


Figure 1 - Application of Impactor Pays Principle

3. IPART review the MDB and BRC charges, with regard to the concepts of affordability and demand forecasting and social impact of prices.<sup>3</sup>
4. IPART review the application of the 3 C's framework (Customers, Costs, Credibility), and the appropriateness of the framework going forward. Customers have limited to no ability to influence the services WaterNSW provide, their scope, or the manner in which they are prioritised. The 'Costs' element to the framework gives limited consideration to affordability of prices. NSWIC submit the 'Credibility' element of the framework, and the determination is strained when programs or activities such as the non-urban metering policy are not "fit for implementation" and significant additional and ongoing costs are passed on.
5. IPART should not consider the Externality Adjusted Price model in this price determination as insufficient detail, options and/or examples as to how the model could apply have been provided.<sup>4</sup>

### Supporting Information

IPART issued a one-year price determination for the period July 2025 to June 2026. IPART applied the 3 C's framework (Customers, Costs and Credibility) in setting this determination. IPART issued a one-year price determination to allow time to "consider what other actions are needed to address the sustainability risks arising from declining sales of bulk water in regional NSW and proposed rising costs of maintaining assets and ensuring safe and reliable water services".<sup>5</sup> IPART details that the steps to be taken as part of this current review are:<sup>6</sup>

- Progress setting the efficient level of revenue required by WaterNSW for bulk water services to rural valleys.
- Review rural bulk water cost shares and better recognise community service obligations.
- Consider the applicability of socially optimal price models.

<sup>3</sup> See Sections 4.1, 4.5, 4.8, 4.9 for further detail.

<sup>4</sup> See Section 4.2 for more detail.

<sup>5</sup> IPART Final Report June 2025, pp x.

<sup>6</sup> Ibid, pp xii.



- Consider the social impacts of any price rises.
- Provide advice on the alternative scenarios put forward by WaterNSW.
- Ensure flexibility in IPARTs price regulation.
- Expedite the concurrent pricing review of bulk water services to Greater Sydney.
- Assist with any review of WaterNSW regulatory obligations and operating model to enable sustainable, affordable, reliable, high quality bulk water supply.

WaterNSW provided an updated pricing proposal in June 2025 to the Minimum Essential Revenue Requirement (MERR) “required to remain solvent and meet basic statutory and regulatory obligations”.<sup>7</sup> This included:

- Annual real price increases for customers of 25% for each of the following 3 years, or a one-off increase of 48% in year 1 of the determination.<sup>8</sup>
- A revenue allowance of \$201.2 million for 1 year, relative to \$212.9 million in the original proposal.

Following the updated WaterNSW proposal, IPART noted it was not convinced WaterNSW’s proposed cost and price increases were justified to deliver core services.<sup>9</sup> IPART stated the current review will examine the following in closer detail, including whether:<sup>10</sup>

- WaterNSW’s base costs are efficient.
- The impactor-pays principle and resulting cost shares remain appropriate.
- WaterNSW’s pricing structures for its rural water business provides the appropriate price signals and outcomes for its bulk water customers.

NSWIC maintains WaterNSW’s business activity is currently extended beyond the minimum viable level of activity to deliver its core services, that being, delivering bulk water to its rural valley customers and providing the associated customer support.

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<sup>7</sup> WaterNSW Updated Pricing Proposal to IPART June 2025, pp 5.

<sup>8</sup> IPART Discussion Paper, October 2025, pp 3.

<sup>9</sup> Ibid, pp 4.

<sup>10</sup> Ibid, pp 4.



## 2. Expenditure Review

### 2.1. WaterNSW's Commercial vs Non-Commercial Expenditure

#### NSWIC Submission

NSWIC submit:

1. Due to the IPART Act requiring customers *only* pay what an efficient water business needs to deliver quality service, WaterNSW prices should reflect only the revenue requirement for baseline water delivery services.
2. If a true up is adopted during the determination period, the WACC should be lowered to near the risk-free return rate to reflect the relatively low risk WaterNSW would be taking with a true up mechanism in place.
3. IPART consider complete risk mitigation (mitigating risk to the point of zero) is not the primary driver of economic regulation – WaterNSW is a business, and like all others (including in agriculture), should manage an appropriate level of risk in the context of its whole of business – when / if assessing the merits of revising the WACC and / or adopting a true up mechanism.
4. WaterNSW performs a range of activities beyond core business, and these should be defined as non-commercial activities. Currently the cost shares for activities considered non-commercial assign an impact proportion to WaterNSW customers, and therefore the resulting prices set are recovering costs for these activities.
5. IPART remove the obligations in WaterNSW operating licences imposed from 1 July 2025 from the allowable costs to be recovered from rural valley base customers and the associated water use.
6. Establish a clearer delineation between the commercial and non-commercial services WaterNSW provides and ensure the non-commercial activities are not funded by bulk water users.
7. WaterNSW provide evidence of concerted efforts to respond equitably and efficiently to non-commercial based cost drivers by accounting for these costs through non – customer-based revenue, rather than shift these costs to its customer base.

Actioning both will:

- Ensure pricing reflects only essential, efficient service delivery.
  - Promote transparency and accountability in expenditure decisions.
  - Reduce cost pressures on rural valley bulk water users by reallocating public-benefit driven costs appropriately.
8. It is unclear if WaterNSW undertaking these non-commercial services has resulted in improved service levels for WaterNSW customers. Example areas in which no change and/or a decrease in service levels have been experienced include delivery timeliness, ease of



ordering, work health and safety outcomes, long response wait times, timely meter reading and maintenance, consistent advice provided by front line staff, and delayed licence and approval processes.

9. Basic services levels should always be provided and maintained, and WaterNSW should reprioritise allocation of resources to ensure a sufficient level of service is always provided for core business and commercial services provided to paying customers.
10. Several non-commercial activities/obligations fall beyond WaterNSW's rural valley water delivery business and should not be funded from revenue collected by rural valley bulk water users. IPART should review elements of WaterNSW business that related to NSW Government, including specifics contributing to the prices for rural valley customers such as, but not limited to:
  - Land tax obligations.
  - WaterNSW dividends to NSW Government.
  - Public expectation for policy reform, projects and activities (e.g. fish passage, cold water pollution).<sup>11</sup>

## 2.2. WaterNSW Expenditure

### NSWIC Submission

NSWIC submit:

1. WaterNSW have provided insufficient justification and/or detail as to the breakdown of their base operating costs.
2. IPART provide a public report on the findings from the expert consultant engaged to review the appropriateness of WaterNSW's base operating costs as part of this review and provide a further engagement opportunity for WaterNSW stakeholders to provide input in response to those findings and before the 1 July 2026 determination is finalised.<sup>12</sup>
3. IPART provide a detailed Terms of Reference and / or scope for what the expert consultant is reviewing before customers can comment in-depth regarding WaterNSW expenditure and base operating costs. Some question NSWIC submit be addressed are:
  - Is it clear the MERR has reduced costs and therefore prices anywhere and how?
  - Can WaterNSW provide a breakdown of reduction from original proposal to the MERR proposal?
  - What is the impact of 282 WaterNSW positions being made redundant on WaterNSW base operating costs?

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<sup>11</sup> See Section 3 for further detail.

<sup>12</sup> IPART Discussion paper, October 2025, pp 14



- Example being: WaterNSW made 282 FTE redundancies, assuming 282 FTE at an average salary of \$80,00K a year, is \$22.5m in savings per a year. Can IPART investigate and demonstrate how these cost savings will impact the WaterNSW business and subsequent revenue requirements.

#### 4. WaterNSW's base costs are inefficient.

##### *OPEX*

- The proposed operating expenditure increase compared to actuals is significant, and the use of the base trend approach has resulted in difficulty calculating the trail underlying the proposed base, step and trend adjustments made to the model.<sup>13</sup>
- Only three of the adjustments meet the requirements of the IPART Water Regulation Handbook.<sup>14</sup>

##### *CAPEX*

- Use of long-term trends for asset replacement at their end of book life can overstate expenditure and in the case of rural valleys this approach is inappropriately driving higher renewal requirements and subsequent costs estimates.<sup>15</sup>
- Programs for Environment and Dam Safety Compliance are significant and have increased significantly in recent years.<sup>16</sup>
- WaterNSW has applied a conservative attitude to risk and asset management.<sup>17</sup>

##### *Digital*

- Digital expenditure is not operating at an efficient level.<sup>18</sup>

#### 5. WaterNSW's systems and process require improvement in the following areas.

- Long term planning and projections systems.<sup>19</sup>
- Formal documentation and audit trails – demonstrating robust decision-making logic, efficiency and consideration of customer impact and benefits.<sup>20</sup>
- Record keeping to facilitate provision of historical data (including historical variances of operating expenditure against the Determination).<sup>21</sup>

#### 6. IPART consider adopting the Australian Government 'Regulatory Burden Measurement Framework' for assessing the appropriateness of compliance costs and subsequent cost

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<sup>13</sup> AtkinsRealis, WNSW Expenditure Review Final Report, 25 June 2025, Pp 10.

<sup>14</sup> Ibid, pp 11.

<sup>15</sup> Ibid, pp 13.

<sup>16</sup> Ibid, pp 13.

<sup>17</sup> Ibid, pp 26

<sup>18</sup> Ibid, pp 15.

<sup>19</sup> Ibid, pp 10.

<sup>20</sup> Ibid, pp 12.

<sup>21</sup> Ibid, pp 12.



burdens. Including application of the Better Regulation Principles outlined on page 9 of Analysis 'Regulatory Burden Measurement Framework'.<sup>22</sup>

7. The WaterNSW business model, underpinning WaterNSW expenditure increases and subsequent MERR pricing proposal, is reviewed:
  - Costs outside WaterNSW delivery its core services
  - The appropriateness of customer cost recovery for those costs within WaterNSW control assessed.
8. IPART consider the approach for determining OPEX allowance applied in the 2021 Determination and whether that is appropriate to adopt again in the upcoming determination.<sup>23</sup>

### Supporting Information

There are cost drivers contributing to the need for increased WaterNSW revenue allowance within and beyond WaterNSW's control.

Drivers outside WaterNSW's control include:<sup>24</sup>

- Rising necessary capital expenditure costs for infrastructure.
- Rising operational costs including interest rates, energy, insurance and construction costs.
- Additional regulatory requirements added to the WaterNSW such as data sharing between agencies, communications and monitoring.

Drivers within the control of WaterNSW's or the NSW Government include:<sup>25</sup>

- Non-critical capital expenditure.
- Operating expenditure.
- Land tax on land owned by WaterNSW not critical to delivery water delivery services for rural valley customers.
- WaterNSW dividends to Government.
- Proposing rural water customers to pay the costs of public good policies, programs and projects such as fish passageways and cold-water pollution.
- Labour costs.

<sup>22</sup> Department of Prime Minister and Cabinet, Office of Impact Analysis 'Regulatory Burden Measurement Framework', February 2024.

<sup>23</sup> AtkinsRealis, WNSW Expenditure Review Final Report, 25 June 2025, pp 57.

<sup>24</sup> NSWIC Issues Paper Submission, December 2024, pp 8.

<sup>25</sup> Ibid, pp 8.



### 3. Cost Share Review

#### 3.1. Impactor Pays Principle

##### NSWIC Submission

1. NSWIC submit:
  - The impactor-pays principles is only an appropriate approach to allocating prices if:
    - The impactor pays principle is correctly applied, including refining the assumptions underpinning the applied counterfactual scenario.<sup>26</sup>
    - The resulting pricing structures set under the impactor pays principle, via the cost share ratios provide appropriate prices for beneficiaries of bulk services such as towns, the wider community and government.
2. Reallocating costs for public-benefit services to public beneficiaries<sup>27</sup> to ensure water using customers are not subsidising unrelated services.

##### Supporting Information

IPART currently applies the impactor-pays principle in their framework for setting WaterNSW's rural valley bulk water customer prices by assuming:

- Costs should be borne by those who cause or benefit from them.
- Government should fund costs when neither of the above is feasible.

The impactor pays principle is consistent with Principle 4 – Cost Allocation, Clause 17 to the National Water Initiative (NWI) Pricing Principles. However, it also appears to contradict Clause 64 of the National Water Initiative, that pricing will (Clause 64 iv) “give effect to the principles of user pays for the required services”.<sup>28</sup> It is our understanding that NSW is the only jurisdiction in Australia that applies the impactor pays model this rigidly in setting prices, with significant consequences to water users.

IPART justifies the use of the impactor pays principle as “a way to promote economically efficient outcomes over time because the impactor would choose to consume the service if the benefit received exceeds the costs arising from providing the service.”<sup>29</sup> IPART note the imperfections with applying the impactor pays principles, noting “where there are high fixed costs, and these

<sup>26</sup> See Section 3.2 Counterfactual Scenario.

<sup>27</sup> See Cost Shares Section and Table 2.

<sup>28</sup> The National Water Initiative (NWI) defines an impactor as ‘individual, group of individuals or organisation whose activities generate costs, or a justifiable need to incur costs. The impactor pays approach seeks to allocate costs to different individuals, groups of individuals or organisations in proportion to the contribution that each individual, group of individuals or organisation makes to creating the costs, or the need for the costs to be incurred.’

<sup>29</sup> IPART Discussion Paper, October 2025, pp 20.



fixed costs are allocated across a large customer base, the customer has limited ability to influence the cost of providing the service.”<sup>30</sup> The logical conclusion of users opting-out of water use is that assets may become stranded, as the cost of continuing to use the service becomes prohibitive. In the case of water infrastructure, it is inconceivable that a government would allow such vital assets to be slowly abandoned via unaffordable price hikes.

IPART have received submissions that noted “the inequality of rural water customers paying for benefits enjoyed by the wider community (e.g. meeting environmental outcomes)”.<sup>31</sup> NSWIC believe that a major ‘impactor’ on waterways is climate change, and many of the services and new infrastructure required is a result of preparing towns and river systems to be resilient to a drying climate. Compared to previous determinations, the impacts of climate change on waterways are more clearly evidenced, experienced and thus more broadly accepted. It would be almost impossible, however, to develop a funding model based around this ‘impactor’ (unless from general revenue), and thus a reconsideration of the impactor- pays principle is required.<sup>32</sup>

## 3.2. Counterfactual Scenario

### NSWIC Submission

NSWIC submits:

1. The assumptions underpinning the counterfactual scenario applied to date, a world without high consumptive water use, are flawed. NSWIC does not support the reasoning used by IPART in its counterfactual scenario.
  - The premise that irrigation alone created the need for water infrastructure is incorrect, and a number of uses (See Table 1) have been identified as drivers to the development and maintenance of this infrastructure.
  - The premise that these uses besides irrigation would still occur in the absence of “high consumptive use of water resources”, and WaterNSW infrastructure would continue to be used if “high consumptive use of water resources” ceased tomorrow, results in the impactor-pays principle being misapplied and is outdated in its current form.<sup>33</sup>
  - The Impactor Pays model fails for long-life assets like dams, built decades ago, as evolving modern environmental expectations (e.g., fishways, pollution mitigation)

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<sup>30</sup> Discussion Paper, October 2025, pp 20.

<sup>31</sup> Ibid.

<sup>32</sup> NSWIC IPART Price Review Submission, 2021.

<sup>33</sup> NSWIC IPART 2024 submission, pp 28.



were not considered at the time. Retrofitting should be treated as a societal responsibility, not imposed retroactively on past investors.

3. The counterfactual scenario should assume the uses of WaterNSW infrastructure would continue, even in the absence of high consumptive users, and a revised impactor pays pricing model would be needed. The model should:
  - Recognise the public and environmental benefits of water infrastructure.
  - Allocate costs more equitably across all beneficiaries, not just rural water users.
  - Reflect modern expectations of waterway management.
  - Account for the public and environmental benefits of water infrastructure and modern expectations of water quality management, domestic use, and mitigating risks of extreme climate events.
  - Acknowledge that subsequent regulatory obligations around dam safety and water management would persist regardless of irrigation development.
  - Factor in that environmental degradation, and the need to mitigate its impacts is caused by various factors like urban pollution, invasive species, land management changes, climate change, and industrial activity. Measures to address these varied drivers should not be borne solely by one party.

### Supporting Information

- IPART define the counterfactual scenario for the purposes of setting WaterNSW's prices for rural valley bulk water customers as "*a world without high consumptive use of water resources*"<sup>34</sup> and assumes dams and infrastructure exist primarily to serve irrigators.
- NSWIC submits this is unrealistic, as water management infrastructure (e.g. dams) construction in Australia has historically served broader public goals such as water security, nation building, and inland socio-economic development.
- The assumption rural valley bulk water users are the sole impactors is flawed; while in many instances it was a primary purpose, the water infrastructure was built for multiple purposes beyond irrigation.
- The impactors in this case should also be acknowledged as the wider public that supported the infrastructure for its social benefits (food and water security).
- WaterNSW will continue to maintain infrastructure regardless of extractive use, due to enduring, and emerging, public expectations. Examples are detailed in Table 1.

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<sup>34</sup> IPART Discussion Paper, October 2025, pp 19.

Table 1 - Activities driven by reasons other than consumptive use

Activity	Description
Replenishment flows for domestic and stock water supply (basic landholder rights)	Basic landholder rights are central to property rights in Australia. Delivering the obligations required by the property right, in this case water delivery services for stock and domestic, is paramount.
Maintaining minimum river flows	Most valleys have minimum flow targets embedded in water sharing plans to maintain constant flow (even in previously ephemeral systems). This is driven by environmental, aesthetic and town water supply reasons stemming from evolving public and community expectations. Water regulation and the associated infrastructure would be required to meet this objective even in a world without high consumptive water use.
Meeting end-of-system flow targets	End of system flow targets exist to ensure connectivity between systems, even during drought. Water regulation and the associated infrastructure would be required to meet this objective even in a world without high consumptive water use.
Meeting South Australia Water delivery obligations under Basin Plan	The southern connected system has obligations under the Murray Darling Basin Plan to meet delivery targets to South Australia for consumptive use, critical human needs and to ensure flows through Murray mouth. This requires water to be managed through WaterNSW infrastructure to be delivered at the South Australian border in compliance with Basin Plan obligations. Water regulation and the associated infrastructure would be required to meet this objective even in a world without high consumptive water use.
Climate change adaptation	Climate change planning and adaptation is central to water planning. A growing expectation, and subsequent policy and regulatory program, is requiring action in this space. This is not driven by rural valley customers water use, but is the result of numerous impactors, both local and international.
Tourism	Maintaining constant flows with high water quality to facilitate recreation opportunities, such as kayaking, fishing, etc. is expected by regional communities. Water regulation and the associated infrastructure would be required to meet this objective even in a world without high consumptive water use.
Flood mitigation	Protection of property from flood risk is expected in communities vulnerable to flooding. Water regulation and the associated infrastructure would be required to meet this objective even in a world without high consumptive water use.



Managing sediment levels and managing cold water pollution	Sediment management improves water quality and fish health, with broad public benefits. Managing cold water pollution is important for preserving ecosystem health. The public and community expectations to manage sediment levels and cold-water pollution for ecological value have evolved and the need to meet these expectations requires considerable infrastructure.
Maintaining fish passage and aquatic habitat	Fish ladders improve fish health, with broad benefits to tourism, recreation and culture. These were not seen as necessary when dams were first built, but community expectation has evolved to see these as important. While important, fish ladders are not related to the delivery of bulk water. Water regulation and the associated infrastructure would be required to meet this objective even in a world without high consumptive water use.
Pumped hydro energy production	Hydroelectric power generation requiring water be pumped from one location to another to facilitate the generation. Water regulation and the associated infrastructure would be required to meet this objective even in a world without high consumptive water use.
Dam safety and critical infrastructure	Water security is a right expected by the general public. Ensuring dam safety is crucial for downstream communities.

### 3.3. Cost Shares

#### NSWIC Submission

NSWIC does not support the existing cost share ratios and as outlined in the Discussion Paper.

NSWIC submit:

1. The revised counterfactual scenario, accounting for uses driven by activities other than consumptive use, should be applied to allocate costs and determine the cost share ratios.
2. The counterfactual scenario must consider that some infrastructure (e.g., flood control dams, water security) would have been built regardless of irrigation demand.<sup>35</sup>
3. WaterNSW's cost drivers are increasingly shaped by public expectations and subsequent government regulation, structural changes - e.g. the merger of State Water with the Sydney Catchment Authority and the transfer of WAMC functions to WaterNSW. These evolving factors are expanding both the scope and the expenses of WaterNSW's operations, and the drivers behind this expansion should be taken into account in IPART's determinations on cost share ratios.
4. A revised cost allocation model should:
  - Reduce the disproportionate financial burden on rural valley bulk water users.
  - Better reflect the shared and public benefits and responsibilities of water infrastructure.
  - Improve fairness in pricing decisions and reflect a 'true' application of the impactor pays principles and associated counterfactual applied.
  - Encourage more sustainable and publicly supported water management.
5. A more accurate application of the impactor-pays principle would result in revised cost-sharing arrangements for numerous categories. IPART should scrutinise all the expenditure categories in Table 4.1 of its Discussion Paper. NSWIC submit the cost shares detailed are evidently misallocated and should be revised to better reflect an appropriate allocation, particularly with consideration to a revised counterfactual assumption.<sup>36</sup>
6. For contemporary projects, environmental and social costs must be integrated upfront into the business case, allowing impactors to weigh costs against benefits. For historical assets, IPART should move beyond the current models and treat today's baseline as the starting point, with society as the collective beneficiary.

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<sup>35</sup> See Section 3.2 and Table 1.

<sup>36</sup> See Section 3.2 Counterfactual Scenario for further detail.



7. NSWIC submit that:

- Many services funded by licensing fees should be publicly funded due to their broad societal benefits.
- The impactor-pays principle is difficult to apply in cases where impactors are historical, or unable to pay.
- Planned Environmental Water should be appropriately and proportionally recognised as an impactor, and its associated costs should be publicly funded.
- The impactors are no longer only the towns, industry and farms water deliver services, but all stakeholders with growing expectations, and influence over policy and regulatory settings, regrading water management and the infrastructure required.<sup>37</sup>

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<sup>37</sup> NSWIC IPART 2024 submission, pp 29

Cost Ratio	Share	Existing Ratio	Rationale
Metering and compliance		100%	Poor policy and program implementation statewide resulting in the benefits not being realised. This policy/program remains at risk of failure and as such it is not appropriate customers bear the costs for this failed component of the activity.
Water delivery and other operations		100%	Urban development and public infrastructure are an important factor in establishing river flow management regimes and it is these flow regimes that lead to the need for remedial and preventative works. This development and infrastructure are required for the broader community regardless of their demand for or use of water. Therefore, the main impactor is the broader community, not solely water users. Further, water delivery and other operation requirements such as PEW and MDB Plan obligations (e.g. deliver water for South Australia use).
Corrective maintenance		95%	Failures often arise from increased demand or stress on infrastructure driven by multiple users. Sharing costs ensures those who contribute to wear and tear also contribute to restoring reliable water delivery.
Routine Maintenance		95%	Regular maintenance is important to ensure WaterNSW infrastructure assets function and deliver for the needs of multiple and diverse user requirements. Allocating maintenance costs across all users proportionally reflecting the level of impact each user has on maintenance of the infrastructure is appropriate.
Asset management planning		95%	Asset management planning must account for future demand patterns shaped by all user types. Water use for irrigation has been steadily declining for many years, with other types of uses increasing.
Renewal and replacement		95%	Renewal and replacement are important to ensure the WaterNSW infrastructure delivery system provides for the needs of multiple and diverse user requirements. Allocating Renewal and replacement costs across all users proportionally reflecting the level of impact each user has on the need to renew and replace assets is appropriate.
Hydrometric monitoring		90%	Accurate data underpins equitable and informed management water. All users should contribute to the costs of hydrometric monitoring proportionally.
Flood operations		80%	Flood operations are in place primarily to mitigate risks and protect population centres. The public beneficiaries should bear a greater share of this cost share ratio to ensure this activity is appropriately resourced and flood risks are mitigated effectively.
Water quality monitoring		80%	Interstate water sharing arrangements, the Basin Plan and the Murray-Darling Basin Agreement require the monitoring of water quantities and quality along the system to ensure the State and river operators are meeting their obligations under interstate agreements.



Dam safety compliance	80%	WaterNSW also noted in its submission to IPART that the community is the impactor of this cost and it is reasonable “to support a greater sharing of the costs of Dam Safety Compliance between water users and the broader community” <sup>38</sup> The public beneficiaries should bear a greater share of this cost share ratio.
Environmental planning and protection	80%	NSWIC submits that the increased activities (frequency, quality) required to meet increasingly higher and more burdensome modern standards for environment planning and protection is being driven by increasing broader community / public expectations and subsequent Government policy. Negative environmental impacts on waterways are likewise multi-faceted, yet the current cost-shares apportion 80% of costs onto licence holders. The public beneficiaries should bear a greater share of this cost share ratio.

NSWIC submit the following previous submissions be considered:

- NSWIC submission to IPART Issues Paper December 2024
- NSWIC submission to IPART Issues Paper October 2020
- NSWIC submission to IPART Review of Rural Water Cost Shares November 2018

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<sup>38</sup> WaterNSW, 2024, Attachment 25, Proposed user and government share.

## Supporting Information

In the Murray-Darling Basin:

- Licensed water extraction in the Murray-Darling Basin has accounted for less than a third of total water in the Basin in every year since 2018 (see Table 2).
- Yet roughly 80% of WaterNSW's costs are recovered through water licensing fees.

Table 2 Surface water use in the Murray Darling Basin 2018 to 2023.<sup>39</sup>

	2023	2022	2021	2020	2019	2018
Water availability (GL)*	63,859,307	51,472,918	32,170,604	22,286,228	20,530,060	28,401,667
Water accessible (GL)**	16,312,456	16,524,964	11,602,116	6,634,142	7,037,105	9,975,447
Water taken (GL)***	6,355,359	8,436,233	7,952,068	5,090,614	5,841,944	7,891,237
% water accessible taken	39%	51%	69%	77%	83%	79%

\*Surface water availability is the sum of accessible storage at the start of the year and estimated inflows into storages and rivers during the year.

\*\* Accessible water is water is the volume of water that is lawfully accessible for consumptive use and is the sum of surface water allocations, other statutory rights and carryover at the start of the water year

\*\*\*Water taken is the volume of water taken for consumptive use and includes floodplain harvesting. This does not include water for environmental purposes.

While water diversions and availability fluctuate year on year, Table 2 illustrates the extent of water use in the Murray-Darling Basin. In a wet year (2023) water use is around 10% of total water (inflows and storage) and in a dry year (2019) it rises to 28% of total water (inflows and storage).

In the 2021 determination, licencing fees covered 70.9% of WaterNSW's budget. These high-level figures demonstrate the broad misalignment of cost recovery and the amount of water diverted for consumptive use. This misalignment demonstrates a need to refine select and applicable cost share ratios (e.g. water delivery and other operations, maintenance related ratios, dam safety compliance) to ensure they appropriately reflect the impactor.

There is growing tension in the pricing framework as cost allocations are balanced across rural valley bulk water customers and the public beneficiary (NSW State Government). NSWIC have

<sup>39</sup> [Australian Government, Bureau of Meteorology, Murray-Darling Basin: Supporting information](#)



long advocated for a more equitable and realistic approach to cost allocation that reflects shared public benefits and diverse impactors. NSWIC has consistently argued rural valley bulk water customers are paying more than their fair share under current cost allocation arrangements.

Further, water working groups convened by WaterNSW and representing industry, water licence holders, environment, community/resident interests across regional NSW expressed overwhelming support for an increased government cost share to achieve greater equitable cost distribution.<sup>40</sup>

The large portion of infrastructure driven fixed costs for WaterNSW means customers cannot effectively send market signals to cease utilising the infrastructure. NSWIC notes that in other areas, like public transport, fixed costs are not incorporated into fees, yet in water management, users are expected to fund these sunk costs.

Many programs funded through these fees provide broad public benefits, including:

- Tourism, flood mitigation, water security, cultural values, and recreational use.
- Economies of agglomeration – the Irrigation Infrastructure Operators create efficiencies through geographic concentration of populations.

**Difficult-to-identify impactors:**

- Environmental degradation: Caused by cumulative effects of irrigation, flooding, urban runoff, climate change, and historical land use.
- Flood control dams: Serve multiple purposes (e.g., flood mitigation, irrigation, urban supply), making cost attribution complex.
- Management of catchment-wide pollution: Diffuse sources (e.g., agriculture, forestry, urban areas) complicate impactor identification.
- Climate change: Global drivers like drought and extreme weather affect water systems but cannot be linked to specific users.

**Planned Environmental Water**

River regulation has shifted flow conditions from their natural cyclical patterns of dry and wet periods to a more constant flow with Planned Environmental Water (PEW). This change reflects the need to balance evolving public expectations, the water use requirements of downstream users (including South Australia needs).

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<sup>40</sup> NSWIC Submission IPART Discussion Paper, December 2024, pp 9.



Facilitating the flow of Planned Environmental Water (PEW) is a required function and represents a notable share of water use. However, it imposes real costs on infrastructure, and management and public beneficiary should be assigned those costs via the cost share ratios.

## 4. Pricing Review

### 4.1. Affordability

Please refer to NSWIC Submission to IPART Issues Paper, December 2024 for further detail regarding affordability of proposed price increases for WaterNSW rural valley bulk water customers.

#### NSWIC Submission

NSWIC submit:

1. the existing Community Service Obligation (CSO) arrangements are critical to maintaining equitable access and should continue for the North and South Coast regions.<sup>41</sup>
2. IPART give the following cost drivers due consideration when assessing the affordability element in this price determination:
  - Rising input costs (e.g. water, electricity, interest rates, fuel, wages, and insurances)
  - Irrigated agricultural businesses' already strained ability to absorb increasing water prices/increased cost burden to their businesses.
  - Cyclical nature of wet and dry periods, and the highly concentrated, and often enduring periods in which negative conditions result in financial pressures on irrigated agricultural business.
3. NSWIC *oppose* the proposed water price increases from an irrigated agricultural affordability perspective and submits the follow:
  - Water pricing must reflect the economic realities of food production.
  - Policymakers must consider the downstream effects on food security and cost of living.
  - The cumulative burden of rising costs is unsustainable for irrigated agriculture.
  - Gross profit margins is not an appropriate metric for assess affordability of price increases for agricultural businesses and should never be used as the sole information to assess the cost of production.<sup>42</sup>

#### Supporting Information

The impacts of steep price increases for irrigated agriculture continue to be significant and the viability of irrigated farming is at risk under increased price conditions. Irrigated agricultural

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<sup>41</sup> Ibid, pp 17.

<sup>42</sup> Farm financial tools: profit and loss budget. Grains Research and Development Corporation. (2025).



businesses in NSW have experienced increasing financial pressure in recent years, with rising input costs in interest rates, fuel, insurance, machinery, wages and energy, and higher water allocation prices due to State and Commonwealth environmental water recovery placing increase pressure on commercial viability. Considering irrigated agricultural businesses are accepted as price takers in the food and fibre markets they supply, they already have a very limited/non-existent capacity to pass on increased costs to consumers. Considering both of these realities, irrigated agriculture business has a very limited capacity to take on increased costs and continue remaining commercially viable.

Past NSWIC's submissions emphasised that 15% per annum increases plus CPI still add up to a >100% cumulative price rise over the five years and is still unaffordable.<sup>43</sup> A price increase of this degree would:

- Reduce domestic food production capacity.
- Increase the cost of food and fibre for Australian consumers.

Without pricing reform, Australia risks:

- Losing productive farms and rural jobs.
- Becoming more reliant on imported food.
- Exposing consumers to higher prices and reduced food security.
- Compromising regional water security in NSW (if WaterNSW has an insufficient customer base the organisation will be non-commercial, risks cease operating and threaten water security).

## 4.2. Externality Adjusted Prices

NSWIC submits the externality adjusted price model is not appropriate for use in the setting of WaterNSW rural valleys bulk water prices. This is due to the following reasons:

- Unclear application: It is unclear how the model would be applied to the price determination. No options and/or worked examples have been included in the material provided. It is difficult to comment on the application, and merit of, the Externality Adjusted Pricing model until such material is provided. Comprehensive engagement with customers speaking to the mechanics, risks and merits of the application is necessary before the model can be adopted.
- Complex causality: Environmental degradation often results from multiple sources (e.g., irrigation, urban runoff, climate change), making it hard to assign costs accurately.

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<sup>43</sup> NSWIC Submission IPART Issues Paper, December 2024.



- Diffuse impacts: Issues such as catchment-wide pollution and sedimentation are difficult to trace to individual users, risking unfair cost allocation.
- Reduced agricultural viability: If negative externality costs are added without offsetting support, irrigated farms may become unviable, leading to job losses and reduced food production.<sup>44</sup>
- Overcorrection: If externality costs are exaggerated or poorly modelled, prices may be set at inefficiency levels resulting in users may underutilise water.

### 4.3. Length of Determination

#### NSWIC Submission

1. NSWIC supports IPART's current one-year determination, however, recommends that IPART should make a further shorter-term price determination and extend the time period of the review to allow a more in-depth review of the fundamentals to the WaterNSW business model, if IPART is not confident with the further WaterNSW proposals and/or response to the IPART Discussion Paper.
2. In the event IPART is *unable* to garner sufficient confidence:
  - in WaterNSW's pricing proposal (including the fundamentals to WaterNSW's business model as key driver to price setting),
  - the findings from current and ongoing reviews of WaterNSW business won't materially conflict IPART's price determination from 1 July 2026,
  - and that upcoming and significant regulatory reform (i.e. Murray Darling Basin Plan and Water Act review, National Water Initiative review) won't immediately and materially conflict IPART's price determination from 1 July 2026,

NSWIC submit IPART make **2-year price determination** capping price increases at the annual Australian Bureau of Statistics Consumer Price Index (CPI).
3. Only in the event IPART is *able* to garner sufficient:
  - confidence in WaterNSW's pricing proposal, NSWIC submit IPART make a **lengthier** determination to provide WaterNSW customers sufficient certainty in prices reflective of the true and appropriate cost burden,
  - and that upcoming and significant regulatory reform (i.e. Murray Darling Basin Plan and Water Act review) won't immediately and materially conflict IPART's price determination from 1 July 2026,

NSWIC submit IPART make **lengthier price determination** to provide WaterNSW customers confidence prices are reflecting the appropriate cost burden.

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<sup>44</sup> See Affordability Section.



#### 4.4. Form of Control

NSWIC submit the following previous submissions be considered:

- NSWIC submission to IPART Issues Paper December 2024
- NSWIC submission to IPART Issues Paper October 2020

#### 4.5. Demand Forecasting

##### **NSWIC Submission**

NSWIC submits

- IPART provide further detail to any alternative options being considered for demand forecasting to allow informed and detail comment on the merit of each method supporting WaterNSW price determinations.
- IPART conduct consultation with the community advisory groups and consider the trends in water use to inform any workstream or model for demand forecasting bulk water use in the rural valleys being considered.
- IPART consider mitigating risk to the point of zero is not primary driver of economic regulation – WaterNSW is a business like all others, including agriculture, and should manage an appropriate level of risk in the context of its whole of business – when / if assessing the merits of adopting an alternative model for demand forecasting.

##### **Supporting information**

It is difficult to provide comment on an alternative model without further information or data and unless a method that can test demand forecasting vs. the historic actuals more accurately is provided NSWIC.

- WaterNSW currently uses a 20-year historical average of actual sales to forecast water demand.
- NSWIC notes that actual sales often diverge from these forecasts, indicating a need for alternative methods and data sources.
- WaterNSW is developing a long-term forecasting model that aims to include key usage drivers.



## 4.6. Price Structure

### NSWIC Submission

NSWIC submits:

- Retaining the existing valley-based pricing, to preserve accurate and reflective prices relative to costs, be maintained.
- Continuing the CSO for North and South Coast regions, see Affordability section for more detail.
- Rejecting regional pricing proposals (including North/South) due to the potential to mask cost drivers and reduce fairness.

### Supporting Information

- WaterNSW currently applies valley-based pricing, which NSWIC supports for its transparency and alignment with service delivery. See NSWIC previous submission December 2024 for further detail.
- WaterNSW have noted a potential shift toward regional pricing (e.g., Northern and Southern zones). Any alternative model needs to give due consideration to the impacts on customers and any material related to the regional pricing model provided to date does not sufficiently outline how so. A regional pricing model is centred around WaterNSW benefit, not on improved services to valley-based customer.
- NSWIC identifies two core pricing structure priorities:
  - Maintaining valley-based pricing for transparency.
  - Ensuring affordability of rural bulk water services.
- Risks and flaws with a regional pricing model are:
  - It depends on full cost recovery within each region, which may be unachievable due to rising revenue requirements and
  - It obscures visibility of valley-specific costs and services, undermining customer understanding and accountability.

## 4.7. Irrigation Corporation District Rebates

NSWIC submit the Irrigation Corporate District Rebates continue in this upcoming IPART determination. The functions the Irrigation Corporations undertake are important.

Irrigation Corporation District Rebates should reflect increases to relevant elements of WaterNSW allowable operating expenditure to ensure ongoing equity in the rebate program.



Where relevant elements of WaterNSW's allowable operating expenditure increases, the Irrigation Corporation District Rebates should increase proportionally.

NSWIC submit the following previous submissions be considered:

- NSWIC submission to IPART Issues Paper December 2024
- NSWIC submission to IPART Issues Paper October 2020

#### **4.8. MDBA and BRC Charges**

NSWIC submit IPART give due consideration to the appropriate MDBA and BRC charges to ensure they are prudent and efficient. IPART should review both charges with the same level of rigour as the other proposed WaterNSW prices - importantly with due consideration as to how the costs are allocated and the affordability of already high charges and WaterNSW's customers capacity to continue absorbing them in their business.

NSWIC submit IPART require WaterNSW (and MDBA and BRC if applicable) provide a full cost breakdown of the expenditure and activities these charges contribute to per valley.

Further information regarding any analysis of the prudence and efficiency of MDBA and BRC charges should be provided to enable WaterNSW customers to provide an in-depth response.

NSWIC submit the following previous submissions be considered:

- NSWIC submission to IPART Issues Paper December 2024
- NSWIC submission to IPART Issues Paper October 2020

#### **4.9. Social Impacts of Prices**

It is accepted that where the price of a product and/or service increases the relative demand will decrease. Naturally, if WaterNSW's prices are to increase, customers will decrease extraction for water use or trade. T Basin reform that decreases the volume available in the consumptive pool, ultimately decreasing the volume extracted for use or trade, has (and continues to) have a negative impact on the economic activity and social wellbeing of Basin communities.<sup>45</sup> The proportional impact of decreasing long term water usage on the social wellbeing of communities where socio-economic outcomes have historically been driven by consumptive water use (and the multiplier effect irrigated agriculture and resulting socio economic stimulus provides) is

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<sup>45</sup>Marsden Jacobs, Supporting the Independent Assessment of Economic and Social Conditions in the Murray-Darling Basin, August 2019.



found to be significant.<sup>46</sup> Importantly, the size of the community is key. Smaller communities are more vulnerable to the socio – economic impacts and the negative outcomes resulting from decreases water use.<sup>47</sup>

IPART should give due consideration to the socio-economic impacts WaterNSW price increases will have not just on customers, but the communities in which these customers are situated in throughout NSW.

NSWIC submit the following previous submissions be considered:

- NSWIC submission to IPART Issues Paper December 2024
- NSWIC submission to IPART Issues Paper October 2020

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<sup>46</sup> Ibid

<sup>47</sup> Ibid

## Conclusion

As noted in Section 4.2, NSWIC submit that IPART:

1. Make a 2-year price determination capped at CPI and extend the time period of the review to allow a more in-depth review of the fundamentals to the WaterNSW business model, *if IPART does not have sufficient confidence in the relevant information underpinning their pricing determination (recommended), OR*
2. Make a lengthier determination that provides WaterNSW customers sufficient certainty in prices reflective of the true and appropriate cost burden, *if IPART has sufficient confidence in WaterNSW's pricing proposal.*

WaterNSW and the Water Administration Ministerial Corporation (WAMC) costs are increasing far beyond IPART's allowed expenditure targets. There is opportunity to review and restructure rural valleys water pricing, and we welcome the opportunity for IPART to work in collaboration with NSW Treasury who are overseeing a review of water agency cost structures.

While cost drivers and circumstances facing WaterNSW are not identical to WAMC, there is considerable overlap in functions and cost drivers. NSWIC submits that all options should be on the cards for the NSW Treasury review, including:

- Determining whether WAMC's corporate model is fit-for-purpose and capable of providing affordable service delivery for rural water users.
- Deciding if the current cost share arrangements between water users, WAMC and WaterNSW are fair.
- Re-examining the 'impactor pays' assumption used in pricing determinations.
- Scrutinising WAMC cost-recovery targets and efficiency of service delivery.
- Ensuring that IPART decisions safeguard the long-term viability of the irrigation sector and food security in NSW.

IPART should consider the outcomes of the extensive review performed by NSW to develop a revised approach to rural water pricing that provides a productive and lasting solutions.

NSWIC and our members are available at your convenience and NSWIC requests the opportunity to discuss our submission with IPART.



## NSW Irrigators' Council

The NSW Irrigators' Council (NSWIC) is the peak body representing irrigation farmers and the irrigation farming industry in NSW. Our members include valley water user associations, food and fibre groups, irrigation corporations and commodity groups from the rice, cotton and horticultural industries.

Through our members, NSWIC represents over 12,000 water access licence holders in NSW who access regulated, unregulated and groundwater systems. NSWIC engages in advocacy and policy development on behalf of the irrigation farming sector. As an apolitical entity, the Council provides advice to all stakeholders and decision makers.

Irrigation farmers are stewards of tremendous local, operational and practical knowledge in water management. With more than 12,000 irrigation farmers in NSW, a wealth of knowledge is available. Participatory decision making and extensive consultation ensure this knowledge can be incorporated into best-practice, evidence-based policy.

NSWIC and our members are a valuable way for Governments and agencies to access this knowledge. NSWIC offers the expertise from our network of irrigation farmers and organisations to ensure water management is practical, community-minded, sustainable and follows participatory process.

NSWIC sees this consultation as a valuable opportunity to provide expertise from our membership. Each member reserves the right to independent policy on issues that directly relate to their areas of operation, expertise or any other issues that they deem relevant.

## NSW Irrigation Farming

Irrigation farmers in Australia are recognised as world leaders in water efficiency. For example, according to the Australian Government Department of Agriculture, Water and the Environment: *“Australian cotton growers are now recognised as the most water-use efficient in the world and three times more efficient than the global average”*<sup>48</sup>

*“The Australian rice industry leads the world in water use efficiency. From paddock to plate, Australian grown rice uses 50% less water than the global average.”*<sup>49</sup>

Our water management legislation prioritises all other users before agriculture (critical human needs, stock and domestic, and the environment), meaning our industry only has water access when all other needs are satisfied. Our industry supports and respects this order of prioritisation. Many common crops we produce are annual/seasonal crops that can be grown in wet years, and not grown in dry periods, in tune with Australia's variable climate.

Irrigation farming in Australia is also subject to strict regulations to ensure sustainable and responsible water use. This includes all extractions being capped at a sustainable level, a hierarchy of water access priorities, and strict measurement requirements.

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<sup>48</sup> <https://www.agriculture.gov.au/ag-farm-food/crops/cotton>

<sup>49</sup> <https://www.agriculture.gov.au/ag-farm-food/crops/rice>