National Irrigators' Council

SUBMISSION: FEEDING AUSTRALIA DISCUSSION PAPER

SEPTEMBER 2025

National Irrigators' Council

Food · Fibre · Future

Executive Summary

A national food security strategy must consider Australia's food sovereignty as well as, our role in the future food security needs of our trading partners; to achieve this, a national water security strategy for agriculture will be needed to underpin it. Water is a critical input into agricultural production, and the objectives of this strategy cannot be achieved in the absence of agricultural water security.

NIC strongly supports the development of multi-faceted national food security strategy; one that includes food sovereignty and our role in supporting the food security of our trading partners but ultimately enables better policy alignment and integration across multiple portfolios that intersect with Australia's whole food system. Without better alignment and integration of policy objectives with this Strategy, the Government risks undermining the objectives of the strategy through policy and actions in other portfolios and vice-versa. We explore this in our case study of Australia's Food Bowl the Murray Darling Basin, which highlights how this Strategy is being developed simultaneously to the Federal Government continuing to reduce water available for agricultural production. With 1 in 3 litres of water for agriculture in the Basin now removed from production, we have already seen a significant change to the sector and irrigation-water dependent communities and businesses, which will impact our future capacity to produce food and fibre in this region.

Key recommendations

1. Include water security for agriculture as a key pillar of the strategy.
2. Expand the food security strategy to include Australia's food sovereignty.
3. Integrate other policy portfolios into the objectives of this Strategy, such as water and climate, to work towards this common goal consistently.
4. Secure and protect agricultural water security by not removing more water from the agriculture sector.
5. Continue Research and Development investment to support practical and tactical solutions that enable farmers to adapt and innovate in response to a changing climate. Prioritise initiatives that enhance water use efficiency to sustain and improve agricultural productivity.
6. Improve data collection on agricultural production and drivers of change for agriculture, such as water security.

Introduction

The National Irrigators' Council (NIC) welcomes the opportunity to contribute to this discussion paper – Feeding Australia and provide input on behalf of the Australian Irrigation Industry.

Australia's irrigated agriculture sector is essential to Australian's and many around the world producing food such as milk, fruit, vegetables, rice, grains, sugar, nuts, meat and other commodities such as cotton and wine. The total gross value of irrigated agricultural production in Australia is highly variable due to cycles in water availability but is estimated to be $18 billion - noting the Australian Government is no longer collecting real data on its value.

It is through this lens of our contribution to food and fibre production, made possible through secure and reliable water access entitlements that drives our interest in the Government's plan to develop a national food security strategy, and is why Australia also needs a national water security strategy for agriculture aligned with the national food security strategy. A food security strategy that overlooks water security for farming will almost certainly fail. With water as an essential input to agricultural production, water security must be a key focus.

Australia's progress on national water reform established water as a property right, has driven industry efficiencies and sustainability in developed areas, and allowed smarter infrastructure investment decisions in emerging regions. The reform journey and lessons have ensured Australian water sharing foundations are world leading - they adapt to our variable climate seasonality; ensure water sharing is within global standards and have increased water use efficiency.

However, there are inconsistencies in Government policy areas that undermine the future of industry to continue to plan and invest in new technologies and innovation and maintain our international competitive advantage. Key areas of concern include water policy, particularly but not limited to in the Murray Darling Basin and national preparedness for future climate risk.

Our case study on the Murray Darling Basin highlights how the Federal Government's water policy approach which has removed 1 in 3 litres from production, appears contradictory to the purpose and objective of this Strategy. This reform has reduced agricultural production in our food bowl, re-shaped food growing industries, reduced the number of businesses and regional economic activity by focusing on a single lever response to environmental concerns. A new approach is needed that addresses the contemporary environmental issues in the Basin without community and industry impacts.

Furthermore, the recent National Climate Risk Assessment indicates a real risk of severe water security crisis for agriculture. The impacts are stark in the Murray Dalring Basin, where potential future water security risks could undermine the $13 billion Basin Plan reform. A conversation on the priorities and preparation for a changing climate must occur considering water security for people and agriculture.

In Australia, we do have the management foundations, technology and innovations to increase productivity, in a sustainable and balanced way to meet future demands for clean, green and reasonably priced food and fibre. However, secure and sustainable water for production will be a key to meet our national and global responsibilities.

However, we remain frustrated Governments continue to silo their policy responses to issues not to mention that the current misalignment of Government policies, undermines the effectiveness of any Strategy to encourage improved food security. We live in an increasingly complex, global system and we must adapt our policy levers to match this complexity. With that in mind, we must broaden the lens of food security to consider food sovereignty and consider climate impacts, as well as water security for agricultural production.

We have focused our feedback on the Government's Priority Areas are of productivity, innovation and economic growth and how Government policies must

create the certainty needed for industry to continue to be innovative and productive, enabling them to do their job of growing clean, green, food and fibre, and drive economic growth of the regions and the nation. Uncertainty in Government policy has the potential to undermine ongoing investment and potential economic growth in irrigated agriculture.

About us

The National Irrigators' Council (NIC) is the peak industry body for irrigated agriculture in Australia. NIC is the voice of irrigated agriculture and the industries producing food and fibre for domestic consumption and significant international trade. Put simply, our industry is helping to feed and clothe Australia and our trading partners.

Irrigated agriculture in Australia employs world leading practices in water management. Industry has extensively adopted and embraced new technologies and knowledge to ensure we are consistently growing more with less water. Australian farmers also operate under strict regulations and compliance mechanisms. These factors mean we lead the world in both farming practices and produce quality.

Irrigation is used to produce:

100%
AUSTRALIAN RICE GROWN BY IRRIGATION

93%
AUSTRALIA'S FRUIT, NUTS & GRAPES GROWN USING IRRIGATION

85%
AUSTRALIA'S COTTON FARMS USE IRRIGATION

83%
AUSTRALIA'S VEGETABLES GROWN BY IRRIGATION FARMS

53%
AUSTRALIA'S SUGAR IS GROWN WITH IRRIGATION

48%
AUSTRALIA'S DAIRY IS PRODUCED THANKS TO IRRIGATION

NIC's policy and advocacy are dedicated to growing and sustaining a viable and productive irrigated agriculture sector in Australia. We are committed to the triple bottom line outcomes of water use - for local communities, the environment, and for our economy.

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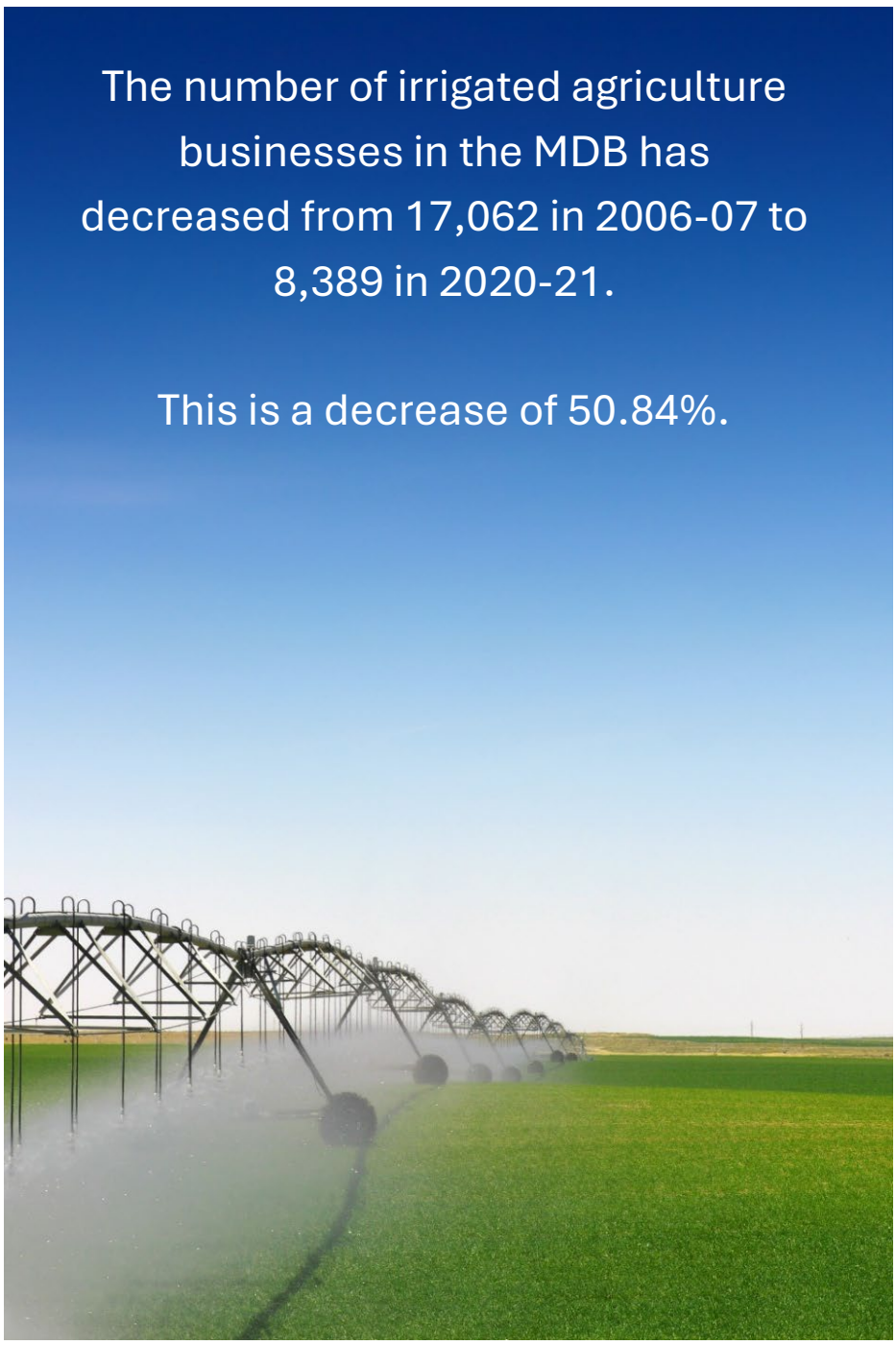
Impacts of water policy on Australian food security

You can't have food security for people, without water security for farmers.

We now have the Federal Government developing a National Food Security Strategy at the same time as continuing reforms to reduce water security of our irrigated agriculture sector.



Excerpts from the Restoring our Rivers Australian Parliamentary Inquiry 2023[1]

"You'll have to pay more for all our products—tomatoes, tinned peaches and everything else. Almost everybody in the room would remember three years ago in the pandemic when the global supply chain was completely obstructed—we were the only ones putting fruit and tomatoes on the supermarket shelves for Australians to eat. Had this, for example, been the year before and prices had gone up, you can tell what the impact would have been on the Australian consumer in general if people couldn't import products to put next to them." - RIFAI, Mr Hussein Hani, Chairman, SPC Global Ltd

"When the price of water goes up for the farms that we buy from, that is obviously going to impact on the price of the produce that we buy." - RIFAI, Mr Hussein Hani, Chairman, SPC Global Ltd

"…food security should be something of utmost importance to the country. Indeed, as a group we saw through the pandemic that it was very difficult to import rice into Australia. SunRice was able to leverage its domestic supply and domestic production, as well as its international mills that we have in other countries, to supplement the supply of rice following disruption from other geopolitical factors and protectionist government policies that were happening externally. The growing of rice is exceptionally important to our business here in Australia, and I think it provides a very high sovereign capability around food supply in the country. Obviously, the water reform, and the impact that could have on the water price—we referenced the ABARES report which says that potentially in eight out of the 10 years pricing could go north of $200 a megalitre—really impacts rice production and could have a very material impact on the long-term viability of that in Australia." - SERRA, Mr Paul, Group Chief Executive Officer, SunRice

"For rice I think the important point is that there is not a linear relationship between the decline in production of rice and the viability of the industry. There reaches a tipping point in any scaled industry where it becomes uneconomical to do below a certain volume… The climate and the current water markets say that perhaps two or three years out of 10 it becomes uneconomical. If you start talking about six, seven or eight years out of 10 where it becomes uneconomical to grow large quantities of rice, then it does put the entire industry at risk. There are tipping points that I think we should carefully understand, and I really urge the Senate to take the time to understand those tipping points for each of the industries and to do the impact assessments of what that looks like so that we can come to a balanced outcome on reform and ongoing industry." - SERRA, Mr Paul, Group Chief Executive Officer, SunRice

"Trying to put it simply, if we've got less access to that water, we're going to have less milk that is actually produced, which has a flow-on effect to fewer products, less production, which will then obviously result in the consequence to the

[1] Environment and Communications Legislation Committee_2023_11_01_Official.pdf;fileType=application/pdf

consumer of higher prices for products." - WALLER, Ms Janine, Executive Director, Australian Dairy Products Federation

"To give you an idea of volume, about 20 per cent of Australia's total milk production comes out of the Murray Darling Basin region, and we employ over 6,800 people, so it would be a huge consequence if there was to be any decline in water and therefore, as you said, the flow-on consequence of that. And it's not just this region. We've got about 250 to 300 million litres of milk that then goes to support other states. We talk about the reliance of the local communities, but the impact would be Australia-wide if we were to experience any reduction in water." - WALLER, Ms Janine, Executive Director, Australian Dairy Products Federation

Questions for discussion

1) What other principles should government, industry and community prioritise to support the development of the strategy and why are these important?

Whilst we support the current principles:

1. Whole food system
2. Collaborative
3. Ambitious and forward looking
4. Outcomes based and practical

Whole food system principle: This principle must include a clear and direct, consideration on water security for agriculture food production as a key principle. This links with the United Nations Sustainable Development Goals for zero hunger and clean water for sanitation.

Furthermore, the National Climate Risk Assessment recently indicated:

> *Changes in water security could significantly impact agriculture due to increases in extended and severe dry periods, variable rainfall, and aridity.*[2]

Whilst not all food is irrigated, 93% of Australian fruits and nuts and 83% of our vegetables for example need water to maintain current quality and supply. These systems are most at risk due to current policy settings and climate change and therefore need broader consideration in the principles.

Collaborative principle: any Strategy must keep farmers, the producers of the food, at the heart of the Strategy. This includes listening and responding to the needs of the agriculture sector who deliver the food security outcomes.

[2] Risks to Primary Industries and Food – National Climate Risk Assessment

Outcomes based and practical principle: a key part of this principle should be alignment with other policy portfolios, so other efforts (and expenditure) by the Federal Government are not in direct contradiction with the Strategy (such as what is currently occurring with the Murray-Dalring Basin Plan, and ongoing water recovery). Integration and alignment with other policy portfolios to the objectives of this Strategy, such as water and climate, should work towards this common goal consistently. Without it there is a real risk of undermining the performance of this Strategy by decisions in other areas.

Furthermore, to be practical for farmers this strategy must respect the current market-based systems, in which farmers determine what to produce, with their available inputs, based on market conditions. For irrigators this is the water management foundations outlined within the National Water Initiative and their state legislation.

Adaptation principle: a principle of flexibility and adaption should also be included as to ensure the strategy is regularly monitored, reported and reviewed.

2) What timeframe should the strategy work towards – short (1 to 2 years), medium (5 to 10 years) or long (10-plus years) term, and why?

Given the complexity of the Strategy and the need for improved integration of the food system, we recommend a minimum of 10-years for the Strategy.

We note that we do not support a static plan, rather an adaptive flexible plan that is regularly monitored and reviewed throughout the implementation term. However, whilst the plan maybe adaptable it is important that businesses involved in the food system, can have certainty for planning and investment. Frequent and constant policy change can be destabilising, undermine investment and innovation. Hence, clear direction should be set with policy boundaries, to provide the certainty for at least a 10-year period for planning.

Suitable funding for implementation for the duration of the strategy should be secured.

3) Are there examples of current or planned initiatives by you or your organisation to improve food security in your sector?

The Australian irrigation industry is world leading in water use efficiency. For example:

> *"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. Water use per hectare continues to decline because of the industry's commitment to developing high yielding rice varieties that use less water, and the use of world's best management practices."* [3]

[3] Rice - DAFF

"Water-use efficiency has increased by approximately 240 percent since the 1970'sand Australian cotton growers are now recognised as the most water-use efficient in the world and three times more efficient than the global average. In addition, Best Management Practices programs, Integrated Pest Management strategies and the use of biotechnology reduced"[4]

The water use efficiency story was a function of collaborative investment and innovation, between research and farmers, as well as policy foundations. The National Water Initiative (2004) set a blueprint to recognise water access entitlements as a property right – secure, defined, mortgageable and tradable, to drive efficiencies and establish nationally consistent water management. This allowed water to move between farms and regions (within rules), to the highest value use. Research and development partnerships then ensure farmers remained on the forefront of technology and innovations to make the best use of the water available.

However, the recent Climate Risk Assessment – Risks to Primary Industries and Food report, indicated that whilst adaption and innovation is a feature of the agricultural sector, it was unclear if the current approaches would be sufficient[2]. This means whilst it is critical we consider ongoing Research and Development into adaption and resilience, and water use efficiency that other investments maybe required to secure our agricultural productivity.

Any future solutions must recognise the established water management foundations but must also consider the practicalities of an uncertain future climate. With this in mind, we consider it appropriate to ask the question whether our existing water infrastructure is fit for purpose to meet the future challenges of water security in a changing climate to enable resilient food and fibre production systems.

Smarter Irrigation for Profit[5] – A Case Study in Cross-Industry Collaboration

Smarter Irrigation for Profit supported research in areas including new irrigation technologies including new sensors, advanced analytics to improve irrigation scheduling and strategies to reduce water storage evaporation. A partnership between the irrigation industries of sugar, cotton, grains, dairy and rice, research organisations and farmer groups it supported a network of 46 farmer led optimised irrigation sites and key learning sites located on commercial farms across Australia.

The project ran 2015-2022 with the Phase 2 focusing on four project themes; develop new innovative technologies, optimised benefits for irrigation systems, closing the irrigation yield gap through best practice and improve the science and water foot printing of Australian agriculture.

[4] Cotton - DAFF
[5] Smarter Irrigation for Profit website

Economic analysis highlighted of the precision irrigation program that an average water productivity increase of 18% (range 11% to 33%, median 11%) and an average multi-factor productivity increase of 59% (range 5% to 165%, median 8%) was achieved. Often the largest gains were labour savings for multi-factor analysis.

A key outcome was further evidence to highlight the potential trade-off between single-factor productivity elements highlights the importance of evaluating multiple considerations when making investment decisions, this is relevant considering the need for climate adaptation approaches (such as conversion to new water efficient irrigation technologies) in the context of wider climate change mitigation strategies (such as reduced greenhouse gas emission) to optimize both economic and socioenvironmental outcomes.

Suggesting the next efforts could be focused on systems and technologies aligned with improved water use efficiency and lower emissions intensity (from reduced irrigation energy use) included: applying automation sensors and crop modelling across cotton, sugarcane, and rice sectors, moving to furrow irrigation from big gun application in sugarcane, and increasing farm output with less water in irrigated grains.

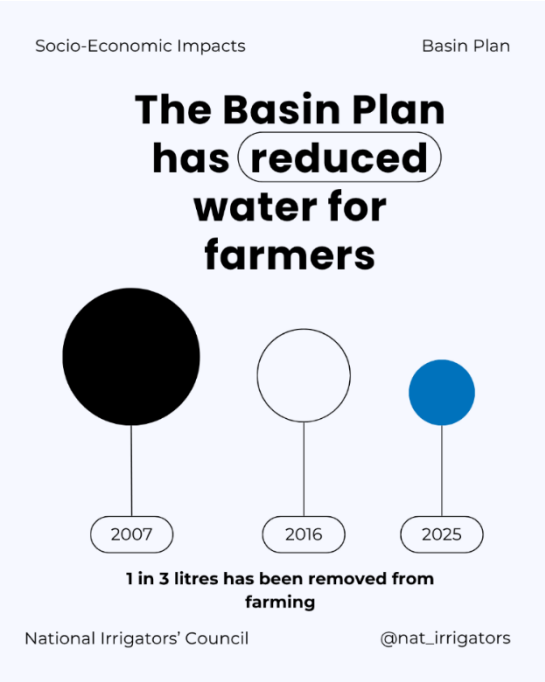
Some key Case Studies include:

- Dairy example Tasmania
- Grains case study Victoria
- Sugarcane Case study
- Automation rice case study

However, there are also examples of where food security is being impacted, not improved.

In addition to looking at *current or planned initiatives to improve food security*, it is important that the strategy also considers current or planned initiatives that *risk* food security.

For example, the Murray Darling Basin Plan as a reform demonstrates the consequences of policy settings impacting on food system production. **Water reforms to date have already seen the removal of 1 in 3 litres of water from irrigated agricultural production**. This has meant that water use is within the new Sustainable Diversion Limits set by the Murray Darling Basin Plan (2012), which has been independently verified by the Inspector General of Water Compliance[6].



[6] Inspector General Water Compliance SDL Report

The **number of irrigated agriculture businesses has decreased from 17,062 in 2006-07 to 8,389 in 2020-21**. This is a **decrease of 50.84%.**

There can be no more water removed from agricultural production.

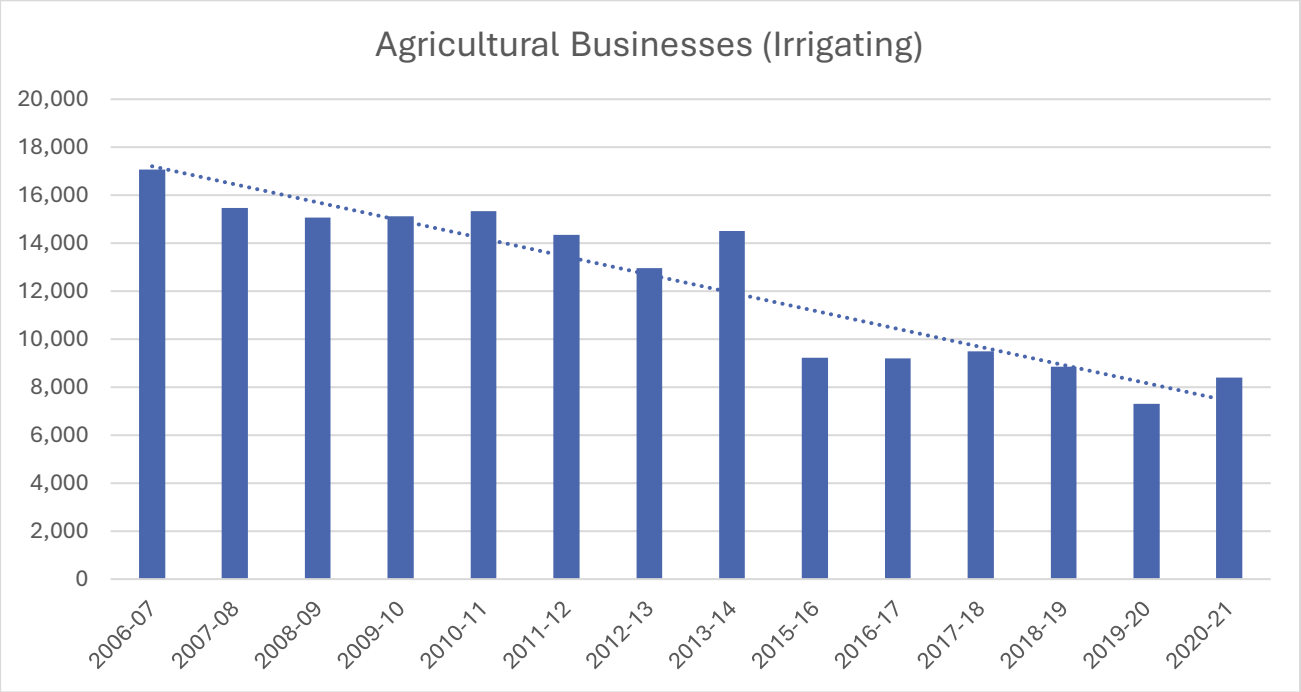


Figure 1 NIC Analysis of ABS Data on Irrigated Agricultural Businesses in the MDB

In 2022, the Victorian Government commissioned Frontier Economics to further investigate these impacts. They found:

"If an additional 760 GL in total (372 GL for 'Bridging the Gap' plus 388 GL for Efficiency Projects) were to be recovered via buyback, in line with the CEWH's existing portfolio, the average annual cost in foregone production would be over $850 million per year. It would also result in an extra 17,500 hectares of high-value horticulture being dried off in a repeat of the Millennium Drought. This is equivalent to more than the combined total of 12,640 hectares of irrigated perennial horticultural plantings in the First Mildura, Merbein, Red Cliffs, Robinvale, and Nyah Irrigation Districts in 2021."[7]

This link between water policy and agricultural production, profitability and thus viability must be considered. The NIC explored this link in our Basin Plan Review - Chapter 6 Agriculture and Communities for more information.[8]

The following Murray Darling Basin Plan – A Case Study, highlights the real and apparent policy question:

Will continuing to remove water from agriculture production enable the achievement of environment objectives or are there other options, to achieve the

[7] Social and economic impacts of Basin Plan water recovery in Victoria
[8] National Irrigators' Council - 'Moving Forward' Our Review of the Murray Darling Basin Plan

same or better environmental outcomes that do not further risk our communities and industries? What is the effect of climate change on this policy approach? Now water re-balancing has been addressed, with Sustainable Diversion Limits (SDLs) in place, are there actions that can achieve further environmental outcomes without the impacts on the agriculture sector?

We encourage the National Food Security to consider all current Government policy approaches to water and climate and how they intersect with a plan for more secure and sustainable food.

Murray Darling Basin Plan – A Case Study

The Murray-Darling Basin Plan 2012 (Cth) 'the Basin Plan' forms part of a multi-decade water reform journey.

The Basin Plan is primarily about water-sharing, to address the key issue of over-allocation, following the Millenium Drought.

It has achieved what it set out to do – to set, and reduce diversions to, Sustainable Diversion Limits (SDL) that came into effect in 2019 and the most recent reporting indicating full compliance. With over 2,132.7 GL/y has been recovered from consumptive users for the environment (exceeding the 2,075 GL/y total). This means approximately one in three litres of irrigation water is now for the environment (representing the 7 percent of diversions below) that equates to 72% of river flows for the environment.

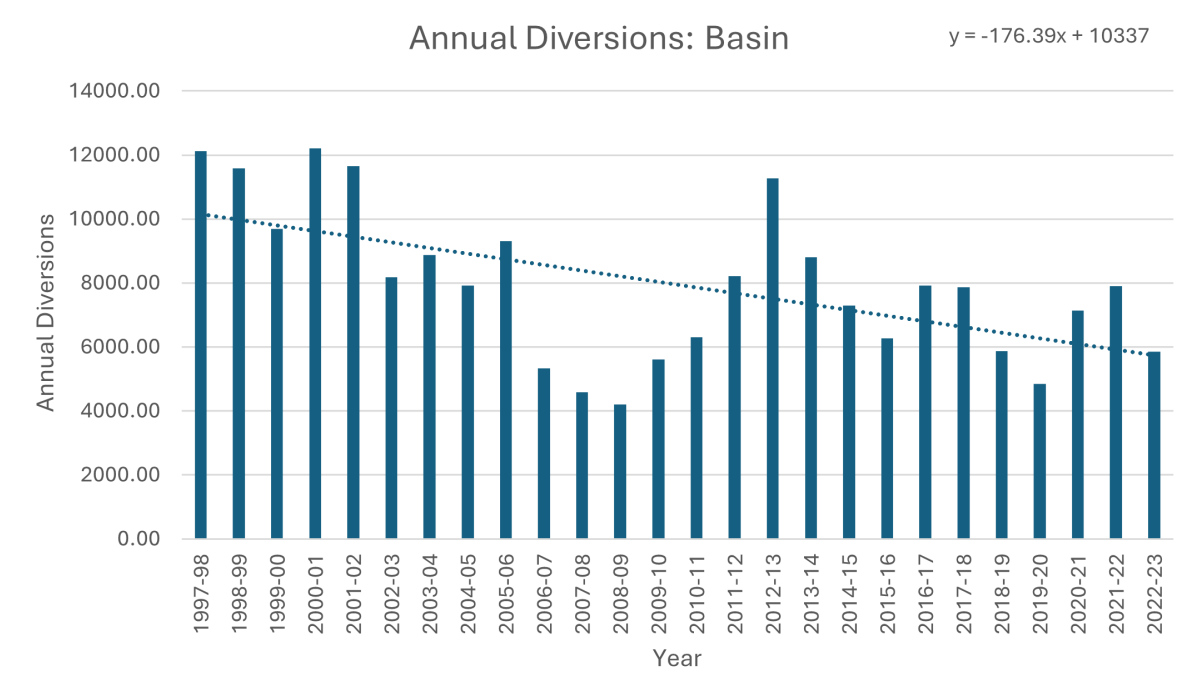


Figure 2: Annual Diversions in the MDB over-time and Trend

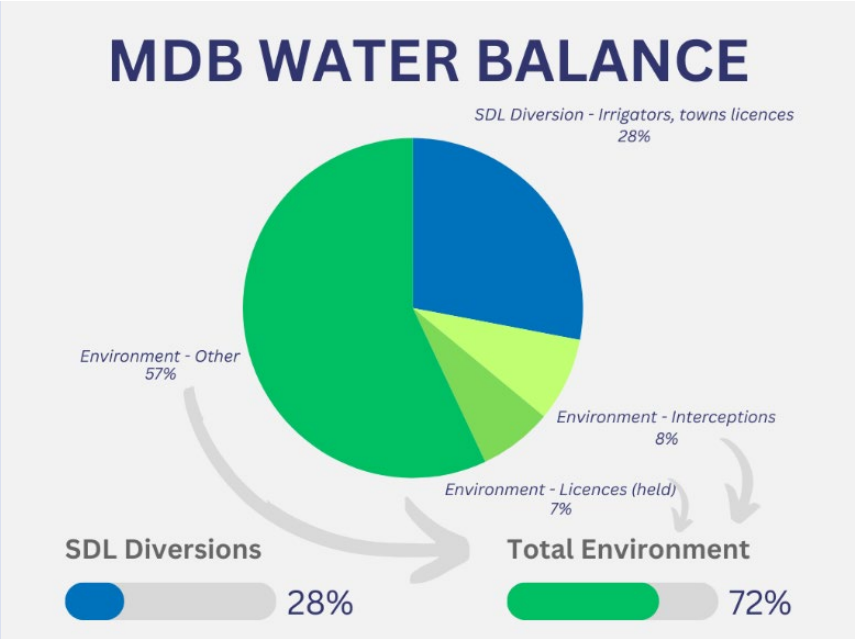


Figure 3: MDB long-term average water balance

Socio-economic analysis methodologies are poor and often underestimate the impact of the reform or communities and industries. However, water reforms that reduce irrigation water supply and affordability, trigger ripple effects across communities. Evidence shows the Basin Plan has had negative socio-economic outcomes. This is often more pronounced in smaller, more remote communities and those industries and communities that are more highly dependent on irrigated agriculture.

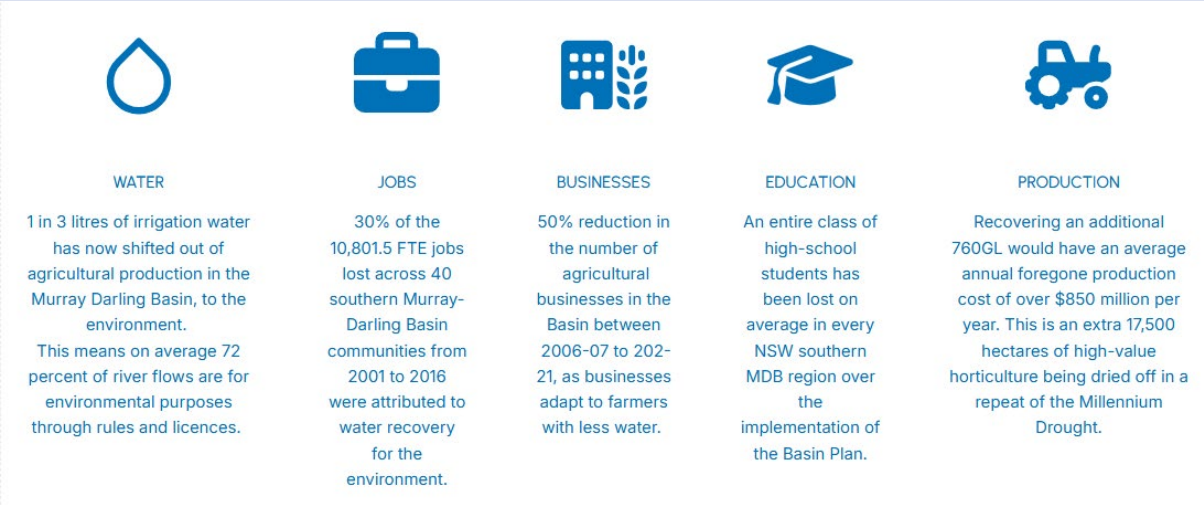


Figure 4: Summary of findings from NIC Review into the Murray Darling Basin Plan

Investigation by NIC revealed that innovation in technology, improvements in water use efficiency and changing crop choice have masked the impact on food systems in some areas of the Basin.

A report by Dairy Australia in 2025 highlighted that milk production in the MDB has fallen by approximately 25% since 2012, driven by farms exiting the industry, shifting

land uses, and water availability constraints, this was higher than the previous estimates by ABARES as part of the regulatory impact assessment.

For more information visit our **Website – Moving Forwards our Review into the Darling Basin Plan**

4) Do the proposed key priority areas and whole of system considerations adequately represent the actions needed for an effective food security strategy? If not, what is missing?

The missing part is the need for integration across the broad range of policy portfolio areas that impact on the agriculture sector.

As outlined above, we are seeing the Federal Government developing this Strategy at the same time as they are actively buying back additional water from farmers (above the Basin Plan mandatory targets to achieve compliance with Sustainable Diversion Limits). This is reducing the pool of water available for farming in the Murray Darling Basin, as well as increasing the price of water on the market. This Strategy must take a broader look at the multiple driving forces behind changes in the agriculture sector, including key risks and vulnerabilities (many of which are being driven by Government). Realising the desired outcomes of this strategy will require other policy areas working towards these, as shared objectives, not in isolation.

A further missing piece is the need for improved data. For example, the ABS historically provided data on 'Water Use on Australian Farms'. This was discontinued after 2020-21, and has been collected / presented differently over time, making comparisons of data incredibly challenging. Gaps and inconsistencies limit the ability to track trends over time or assess cause and effect. The lack of recent data also means lag effects are not visible from earlier water recovery, nor immediate effects of more recent water recovery. NIC recommends a clear plan is needed to ensure data is available to inform policy decisions appropriately and understand trade-offs, but also to track progress of the Strategy, including key pillars such as water security.

Finally, there is limited understanding about how and where our food is produced in Australia and how this is important to the economy as well as our food security and food sovereignty. This Strategy could also importantly enhance the broader understanding of agricultural and food system in Australia. Improved education on agriculture, and better linkages to consumers, will help.

5) What actions could the strategy take to address challenges under each key priority area?

Productivity, innovation and economic growth

The following is a list of possible actions:

- No further removal of water from agriculture – and instead:
    - Development of a water security for agriculture plan, as part of this strategy
    - Tracking of water security for agriculture on a publicly available dashboard, including monitoring of the reliability of water allocations on water access entitlements over time (and accounting for drivers of change, both regulatory and climate); and monitoring of water prices (including accounting for drivers of change).
    - Model the likely future water allocations to water access entitlements under various climate change scenarios, to understand the likely impacts to the agriculture sector and water access.
- Moving forwards, given the near completion of the Basin Plan implementation (with SDLs in effect), amend Murray Darling Basin policy focus to consider water management options beyond the recovery of water for the environment and consider complementary investments that enhance environmental outcomes without more water. Including:
    - Addressing invasive species in our rivers and alongside them to minimise the riparian/aquatic damage caused by these species;
    - Improve riparian corridor condition through improved vegetation and management of weeds, to reduce biosecurity risks as well as improve water quality and fish habitat.
    - Invest in infrastructure that improves fish passage and efficiency of delivering water.[9]
- For the final steps of the current Basin Plan implementation (such as SDLAM reconciliation), do not further reduce water for agriculture.[10]
- Comprehensively map national irrigation crop and water productivity and monitor trends to inform our understanding of risks. This includes reinstating data collection by the ABS that has been disbanded since 2021.
- Investing in RD&E to enhance cross industry learning in water productivity and WUE focused on adoption of technology such as irrigation scheduling and automation
- Consider the progress of states towards National Water Initiative principles and the likely effects on efficient and sustainable irrigation development and food production.
- Ensure the National Water Agreement (the replacement of the National Water Initiative) considers a principle that:
    - secure water for agriculture to ensure food security and sovereignty for Australians.
    - share climate change risks between all water users.
- Review our national water infrastructure and benchmark water security, to assess if it is fit for purpose for a changing climate and determine what regions or communities are at risk of low water security as well as, what industries.

[9] For further information, see: National Irrigators' Council - 'Moving Forward' Our Review of the Murray Darling Basin Plan

[10] For further information, see: National Irrigators' Council - Murray Darling Basin Plan

- Reinvest in the National Water Grid for innovative, climate smart water infrastructure with a focus on supporting regional economies and food production.
- Invest in research and development to inform more resilient crops, improve water use efficiency and minimise biosecurity risks.
- Invest in extension, including in new and emerging irrigation areas to ensure fast and rapid update of highly efficient systems.
- Take direct action on key biosecurity risks.

6) What actions could the strategy take to address challenges under these whole-of-system considerations?

One area of the whole of system considerations is food sovereignty, which the Strategy should be expanded to include. Food sovereignty is our ability to ensure a diverse and consistent supply of food for Australian's. This is increasingly important given the geo-political changes, water security risks and production costs which are driving farmers to make different crop decisions, to ensure they are maximising the production per megalitre of water. A discussion is needed on what foods are at risk on not being produced in Australia and why.

We also support the Strategy including consideration of national security implications of Australia having a productive and prosperous agriculture system, including our ability to export to trading partners. Not only does food sovereignty provide important independence to Australia (if required), but our ability to export agricultural production to trading partners is important for international relations, as well as our macro-economy.

Our trading partners rely on our national food system to export many of the food items they do not produce themselves. Hence, it is important we consider this ongoing commitment with a growing global population and the nation's contribution to other countries food security.

Ends

FIND OUT MORE

For more information visit our website or request a discussion.

Visit us online

www.irrigators.org.au

Background on the Murray Darling Basin Review

Background on the Murray Darling Basin Plan

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