

The Australian Water Brokers Association (AWBA) represents the interests of water market intermediaries and other participants in the water industry across Australia. Our primary role is to set and maintain the highest standards of professional practice, education, ethics and professional conduct for the water broking industry.

The AWBA supports the intentions of the plan in improving environmental outcomes, but we disagree with the short sighted methodology being proposed. We think the costs of the proposed actions should be recognised in their entirety by taking into account the impact of lost revenue.

- Outcomes based targets not just blindly targeting volumetric targets. A related point is to develop a measure of environmental health that is not volume based.
- Recognition of the damage to productive industries both immediately and for the foreseeable future (as water is permanently removed from the productive pool). Given the Productivity Commission's remit to take an economy wide view it's hard to see how buybacks can be supported by the PC. A more appropriate recommendation would be to push timeframes back to allow for alternative methods to achieve environmental outcomes while retaining productive capacity.
- The use of the term 'voluntary buyback' is irrelevant. A water market exists to provide sellers with opportunities to match against buyers. The more valid point is the removal of water from the productive pool.
- Recognition of the consequent impact on the national accounts and inflation
- Longer time frames for implementation should be used. In the context of environmental targets for the whole planet in the face of climate change being set for 2030 and even out to 2050 it's hard to see that a five or ten year implementation window would be such a huge crime.