

1 February 2024

National Water Reform 2024 Productivity Commission
GPO Box 1428
Canberra City ACT 2601

To Whom It May Concern.

I have a vested interest in national water policy reform because I am aware of the major challenges Australia is facing in terms of ensuring a sustainable water supply for agriculture, the environment, and communities with respect to climate change instability, water scarcity and growing demands for water.

As a Northern Territory (NT) resident, I am worried about the current water regulatory system in terms of its capacity to accommodate current and future challenges to our freshwater with respect to the following:

- Unlike other jurisdictions, the Northern Territory *Water Act* contains no reference to Ecologically Sustainable Development (ESD) nor similar principles.
- The NT *Water Act* framework for preparing and making water allocations plans (WAPs) is deficient in terms of including mandatory provisions such as the establishment of rules according to which water licences are made and how environmental water is to be identified and maintained.
- The NT *Water Act* is inadequate in terms of ensuring meaningful community consultation because it does not require that water advisory committees are formed nor that they are comprised of local community representatives and Traditional Owners.

As it stands, the current water regulatory system in the NT is not consistent with the National Water Initiative (NWI) objectives nor is it capable of being reflexive to issues identified in the recent Productivity Commissions report in terms of addressing emerging challenges such as climate change and population growth. Specifically, the NT water regulatory system:

- Is not strengthening the capacity to deal with climate change and extreme weather events.
- Is not ensuring provisions for the increasing involvement of Traditional Owners in water resource management.
- Is not ensuring the preparation of water plans with provisions for the environment.

Holding the NT government and all other states and territories accountable to NWI policies and principles for the benefit of all Australians may be achieved by the Productivity Commission recommending the following changes to the NWI:

- An accountability measure to ensure state and territory government policy consistent with NWI objectives and principles.
- Reinstatement of the National Water Commission

- Meaningful engagement and consultation with First Nations communities in relation to water decision making.
- Co-management models to allow for First Nations management of water catchments and groundwater.

Yours Sincerely,

Melissa Ball