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# Productivity Commission inquiry into National Water Reform 2020 - 2021

## Brief Comments

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001 12 June 2020

Water reform: - Australia should have a long & deep National river joints by States' rivers from North Queensland to South Australia to run water from rain or flooding regions to drought and farming regions. - Build up the hydro-electric stations to help people living in bushes to have sources of water for their farming or when the weather to be drought and having bushfires. - Build-up the factories near the coal mining sites that use Carbon & CO2 to manufacture other material products especially the hard & light concreted panels for building industry. This materials can use to build dams or bridges and tunnels or it can be exported to overseas. A National river is necessary for this type of freight transportation at cheap costs than roads or sea transports.

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002 26 June 2020

On page 21 of the issues paper it states that "Regional providers are present in New South Wales, Victoria, Queensland and Western Australia, while all others are covered by jurisdiction-wide providers." This statement is incorrect for SA. Whilst SA Water does cover a large percentage of the State there are 29 minor and 37 intermediate water/wastewater entities across the state, many run by regional councils and also private entities. The Essential Services Commission of South Australia (ESCOSA) licences water and sewerage entities as outlined in this link.

<https://www.escosa.sa.gov.au/ArticleDocuments/547/20190122-Water-SouthAustralianWaterIndustryOverview-InformationSheet.pdf.aspx?Embed=Y>

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003 13 January 2021

Section 100 of the Australian Constitution says, "The Commonwealth shall not... abridge the right of a State or the residents therein to the reasonable use of waters of rivers for conservation or irrigation." With respect to the Murray-Darling and the associated rivers and systems, the key word there is reasonable. None of the states are being reasonable with respect to conservation or irrigation, and none of them are being reasonable to each other or themselves. The Murray-Darling and associated systems are of incredible importance to Australia as a whole, and to its ecosystems. Those ecosystems are internationally important. It is time for the Commonwealth to step in and regulate the entire Murray-Darling network in place of the farrago of state-led rubbish, so that all of the system's water users can have confidence and security in their access.

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004 11 February 2021

Does this include Irrigation companies in NSW (IIOs) as no one has oversight over them. NRAR need ombudsman like powers to stop corruption and water theft inside these these areas. These companies are also excluded from NSW water metering rules . there is nothing in place to stop the companies stealing their shareholders water and trading it on. your 1800 n0 is not connected

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005 12 February 2021

I support the need to do a substantive review of the National Water Initiative (NWI). The Productivity Commission's draft report acknowledges the gains made and identifies areas where reform should be made. I have no issue with these directions. However, I am of the view that this report does not confront directly two major issues. The first issue is the absence of a comprehensive consideration of limits to water resources in the Murray-Darling Basin and what this might mean in terms of external "fixed" parameters. I have particular concern about the National population and development parameters. The report refers to a projected 11 million in capital city population by 2050 as one argument for the review. However, surely, the perilous state of water resources is a major argument for reviewing such projections rather than the implied assumption that they are fixed parameters for the MDB review. It is clear that this enormous (44%) and rapid increase in National population will "spill over" to additional significant water demands in the Murray-Darling Basin. The question is whether this is acceptable and might appropriately lead to some revision of this projected population increase. It should be noted that more than 60% of this projected population increase is via immigration, a mechanism that is highly controllable by the Commonwealth. I would argue strongly that this population increase is of such a size and nature that it should be questioned in terms of its impact on the rivers of the Nation and in particular the highly stressed the Murray-Darling Basin rivers. The second issue is the equity of the current water sharing arrangements. We are very aware that much of the initial NWI was driven by clear over-allocation necessitating a significant wind back in utilisation. Whilst the reforms have improved utilisation efficiency, over-utilisation remains a critical problem and this can only become more extreme. Furthermore, the current sharing arrangements are contentious, and many environmental specialists consider the environment was given short shift in the reallocation process. Of course, First Nation's needs, as noted in the Draft Report, have not yet been formally and properly considered. This situation could be likened to climate change. Is not the Murray-Darling Basin in a similar situation? We are observing long term deterioration that result of which is not yet apparent. The sustainable level of consumption and regulation has not been satisfactorily addressed. Whilst the Draft Report does refer to this issue the language is much too nuanced and political for my mind. After all, a spade is a spade is a shovel. Put more directly, is irrigated agriculture an appropriate activity for a water deficient country such as Australia?

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006 15 February 2021

I am concerned that water is not being used effectively and efficiently. The top 2 priorities should be 1. clean drinking water for human beings, and 2. sustenance of the natural environment, including soil, animals, marine life, and land. Commercial interests should come third, because if we and our offspring are dead, there is no point in being financially wealthy.

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007 17 February 2021

I cannot see anything about the risk for human health associated with increasing number and longer cyanobacteria blooms?

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008 22 February 2021

When considering the future of Water management in Australia, consideration for radiata pine plantations (State & Private) needs to be taken into account. My understanding is that Radiata plantations use 18ML/Ha/year, compared to grazing country or native bushland at 10ML/Ha/Year. With over 250,000 Ha planted in NSW alone, this is over 2 million ML of water per year that has not been considered or accounted for (Out of curiosity - compare this to the "missing" water in the Murray Darling Basin Plan). At a bare minimum this needs to be considered when determining future water volumes & allocation. For a truly fair approach, forestry needs to be held accountable for their water usage over and above the existing land usage rate the same as any irrigator downstream would be. With all research indicating the situation is only expected to worsen, perhaps the Government needs to reconsider its priorities with regards to Pine plantations, and compare the economic yield of Pine plantations vs grazing land + irrigation downstream before giving forestry a free pass in future.

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009 25 February 2021

For the public to accept recycled water as a source of drinking water I think they would need a high level of assurance about the removal / treatment of Endocrine disruptors (EDCs) from wastewater. "EDCs come from a variety of sources such as industrial run-off, personal care products, hormone based contraceptives, leachate from a variety of plastics and even medicine from hospital waste. Importantly, certain chemicals have different concentrations in wastewater effluent and different potencies" <https://atlasofscience.org/the-destruction-of-endocrine-disruptors-in-wastewater/>

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010 23 March 2021

• A renewed NWI must accelerate the focus on addressing over-allocation and overuse, with incentives and penalties for failure to tackle this issue. Over-allocation remains a very serious issue, in spite of 17 years of water reforms. • The primary aim of the renewed NWI should be more efficient and effective of available water sources, while reserving minimum flows to sustain river and ecosystem health. • The message needs to be front and centre that Australia's water resources are finite and limited, and that the government cannot provide unlimited water supplies at every location. • Sustainable management of water supplies needs to be the main goal, with provision to sustain river systems with sufficient flows to enable them to continue to support extractive uses. There should also be a strong emphasis on recycling and re-use of water. • A renewed NWI needs to include provisions to ensure compliance and transparency, with real consequences for failure to deliver agreed actions and outcomes. • The term 'optimising' in relation to outcomes should be replaced with 'balancing', since it is not in fact possible to optimise economic, environmental, social and cultural outcomes with available water resources • A properly calculated Environmentally Sustainable Level of Take should be the basis for all water planning. • A critical impact of reduced rainfall and increased temperatures under climate change is the very significant reduction in run-off. This means that existing dams will hold less water and proposed new dams will not create more water, just retain it upstream, with serious impacts on downstream communities. Further new dams should be opposed, with reduced demand, recycling and re-use preferred. • Sustainable management of water resources should include measures which retain water reserves to manage through droughts. • Water trading needs to take into account third party impacts, including reduced return-to-river flows, changed seasonality of flow peaks and damage to river channels. Water trading must be underpinned by an accurate, consistent database of trades. • Urgent commitment is needed to effective and transparent compliance measures, including penalties for failure to complete agreed actions in a timely fashion. • The impacts of climate change on water availability and on environmental allocations need to be incorporated urgently into water sharing plans. • River systems already in decline will need additional allocations of water to assist recovery, before they can sustain ongoing extractions. • The principle of providing minimum flows to sustain river health before allocating consumptive take is strongly supported. Water accounting should include minimum end-of-system flows. • Water literacy must be improved urgently, particularly so that irrigators understand the risk of reduced allocations and the potential impact of climate change on future water availability.

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011 23 March 2021

The Nation Water Reform Initiative 2020 is essential because as the report acknowledges water is going to become more scarce as the effects of Climate Change increase and the population increases. Securing Aboriginal and Torres Strait Islander people's interest in water is paramount. I agree with all of the recommendations except on water trading. Water is too precious to sell. Water and land should not be separate tradable entities. A centre of excellence in water recycling should be established as more of us in cities, towns and villages will need to drink Purified recycled water. Now each water utility will have to go through it's own process of having new regulations established for its own unique recycling plant as there isn't a "one solution fits all" because of hydrology, geography and many other reasons. There needs to be one institution where all utilities can obtain advice and we need this institution now. We also need to train enough people to be able to operate these essential recycling facilities. The use of the proposed Dungowan Dam as a bad example was excellent. There has been no costing of the upgrade of safety of the existing Dungowan Dam which is owned by Tamworth Regional Council and is still being used, nor the cost of the decommissioning of this dam. The catchment of the present dam is pristine, there is no farming above it. There is no business case for the proposed dam and the business case release date is still unknown. The NSW Water Minister has recently admitted that the dam will not result in more water for Tamworth or our irrigators. This should have been announced when the proposal for the dam was announced. A new pipeline from the existing Dungowan Dam to the Calala treatment works is necessary. The government says that the section from the existing Dungowan Dam to

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Chaffey Dam will not be built unless the Proposed Dungowan Dam is built. A national, collaborative, transparent, accountable and rational water management process is essential because our water is Australia's most precious resource. Thank you for the report and the opportunity to comment.

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25 March 2021

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The National Parks Association of NSW (NPA) was formed in 1957 and sixty-four years later we have 15 branches, 4,000 members and over 20,000 supporters. NPA's mission is to protect nature through community action. Our strengths include state-wide reach, deep local knowledge and evidence-based approach to conservation advocacy. NPA strongly endorses the submission prepared by the Inland Rivers Network, a coalition of which NPA is a member.