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2 July, 2014

To.
Water Act Review Secretariat
Water Reform Division
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Review of Water Act 2007

The following is a submission on the Review of the Water Act 2007. I would be pleased if you took into consideration the following points:-

- The Commonwealth *Water Act 2007* is groundbreaking legislation in its scope to operationalise sustainable use of water in Australia. The key objects of the Act need to be maintained.
- The independent functions of the Commonwealth Environmental Water Holder (CEWH) and the Murray Darling Basin Authority (MDBA) are critical and must be retained
- The delivery of the Basin Plan, while not within the timeframe expected by the review, is on track in the consideration of constraints management, environmental watering strategy and the development of water resource plans.
- The consideration of social and economic impacts of the Basin Plan were built into the model to develop the environmentally sustainable level of take (ESLT), therefore these issues have been adequately addressed. Cultural flows are important and need to be more clearly defined.
- The achievement of the Sustainable Diversion Limit (SDL) will be severely impeded by any cap on water buybacks and the proposed SDL adjustment mechanism
- The proposed environmental equivalence test for supply measures in the SDL adjustment mechanism has environmental trade-offs and will not achieve the objectives of the Act

- The removal of the National Water Commission has direct implications for Part 3 of the Act. An independent audit mechanism is required for the Act to achieve its objectives
- Section 106 of the Act should be amended to strengthen the transparency around trading decisions of the CEWH. The requirement for the use of all trade to result in environmental improvements must be retained.

Yours fraternally

Neville Schrader