

Sarah Moles,

Submission to the Expert Panel on the review of the Commonwealth Water Act 2007

Thank you for the opportunity to make a submission to this Review.

I strongly believe that:

- ◆ The core elements of the Water Act should be maintained in their current form, to ensure the Basin continues on its path to long term sustainability.
- ◆ The Water Act is still in the early stages of implementation and therefore it is too early to say whether the current approaches to implementing the Water Act will achieve its objectives. As raised in previous submissions we have serious concerns with the way the Basin Plan and SDLs were developed in relation to the Water Act, and the resulting difficulties this will create in meeting the objectives of the Act. In light of this, governments must work hard to implement the next stages of the Water Act and Basin Plan in a way that will assist the objects of the Act being met.
- ◆ Imposing a cap on buy backs for water recovery to achieve the SDL will be an obstacle to meeting the objectives of the Act.
- ◆ The SDL adjustment mechanism poses a real risk of eating away at the already inadequate recovery target with no net environmental improvements.
- ◆ Supply measures are not equal to legal entitlements held by the CEWH and pose considerable risks. If governments continue with the supply measure process, safeguards must be developed and put in place.
- ◆ The CEWH must be made more independent through establishment of an independent agency
- ◆ The CEWH's ability to trade environmental water must continue to be bound by environment objectives. The CEWH should not be allowed to trade water to raise funds for operating or administration costs, or any other purpose.
- ◆ The Water Act should be amended to give greater recognition to the needs and interests of indigenous people.

It is unnecessary to specify a future review of the Act, which can be undertaken at any time of the Government's choosing. In my opinion it would be inappropriate to conduct a further review before 2024 when SDLs are in place and sufficient time has passed to gauge their effectiveness.

I regret that time and circumstances have not allowed for detailed comments. However, I endorse the submission made by Environmental Justice Australia.

Yours sincerely,

