



Primary Producers SA
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Phone: 08 8297 0899

Friday 4 July 2014

Water Act Review Secretariat
Water Reform Division
Department of the Environment
GPO Box 787
CANBERRA ACT 2601

Re: Federal Water Act Review

Thank you for the opportunity to provide input in the review of the *Water Act 2007* ("the Act").

It is noted that state water resource plans are not required to be consistent with the Basin Plan until 2019, making it quite difficult to assess much of the effectiveness of the framework in the shorter term.

Nevertheless, concerns have been raised with Primary Producers SA (PPSA) regarding the effectiveness of the framework. Of course cross-border flows are a vital factor for the entitlements of South Australian River Murray water users. The delivery of flows of a reasonable quantity and quality is critical for not only the South Australian irrigation community but all primary producers relying on River Murray water. The ability of the framework to deliver reasonable flows in dry seasons, whether post-2019 or pre-2019, will be a key measure of the effectiveness of the framework for many primary producers in SA.

A key concern for primary producers with River Murray entitlements is the security of those entitlements and maximum clarity on the assignment of risk affecting those entitlements. As well as irrigators, this includes groups such as intensive livestock producers with industrial licences and animal welfare considerations.

Water quality is clearly a particular concern for River Murray water users at the lower end of the system. It is pleasing that water quality targets have been included in the Basin Plan for that region ("end of system"). However their effectiveness in feeding back to affect policy and changes, where necessary and potentially in other parts of the system, is yet to be demonstrated.

It is noted that primary producers in the Lower Lakes region have been establishing private pipelines due to high water costs (particularly via SA Water), sometimes unable to access existing infrastructure. While this is primarily under State jurisdiction, this does highlight some of the practical difficulties being experienced by primary producers in SA.

The management of environmental water is another area which has been raised with PPSA. The SA Murray-Darling Basin NRM Board in SA is aiming for community-based decision making, including with respect to management of environmental water. There seems to be a particular need in this area for a good working relationship (and practices) between the national, state, regional and local levels – and acknowledgement of the wealth of local knowledge which often exists, the very strong interest of local communities and policy-making which can occur at the regional and local levels.

For further information on this matter please contact Amy Williams 08 8297 0899.

Yours sincerely

A handwritten signature in black ink that reads "Rob Kerin". The signature is written in a cursive, flowing style.

Rob Kerin

Chairperson

Primary Producers SA