

17 July 2014

Water Act Review Secretariat
Department of the Environment
wateractreview@environment.gov.au

Dear Sir / Madam,

Review of the Water Act 2007

The Australian Petroleum Production & Exploration Association (APPEA) welcomes the opportunity to provide comment on the review of the Federal *Water Act 2007* (The Water Act).

Ensuring the long term sustainability of groundwater and surface water supplies is clearly to the national interest, and this requires careful balancing of environmental, social and economic outcomes. The natural gas industry is committed to ensuring that its activities support the most optimum approach to the long term management of Australia's water resources.

APPEA recognizes COAG's important role in water reform over many years and supports the COAG 2004 Intergovernmental Agreement on a National Water Initiative. The Water Act 2007 is designed to incorporate, and where necessary build on, the water planning already undertaken by the states (in the Murray Basin) with the state governments retaining primary responsibility for approval and regulation of water.

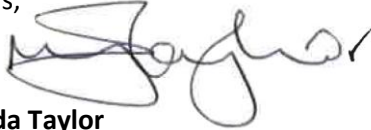
The Water Act and state arrangements must provide a an effective and clear pathway for access to water resources for new market entrants, and recognise the differing values of its economic use by different industries. While the onshore gas industry is a relatively small user of water resources, the industry's economic value to Australia is very high and those resources remain vital to the industry. Water planning must ensure that any potential barriers to industry access are recognised, reduced and managed.

APPEA supports the Australian Government's deregulation agenda, including commitment to reducing the high costs of compliance with duplicative, unnecessary or ineffective regulation, including water management. In particular, unnecessary and duplicative reporting and auditing requirements should be identified and removed.

APPEA has particular concerns with the potential operation of the "water trigger" for coal seam gas and large coal mine developments under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and the interaction of those requirements with the Water Act. Further work is needed to take into account the intersection of the Water Act with these other relevant regulatory instruments and regimes to ensure no unintended confusion and duplication or inconsistencies.

APPEA is keen to work with the inquiry to identify further opportunities for sensible reforms to current legislative and regulatory arrangements, including the removal of obsolete, overly complex or duplicative regulation, to reduce the burden and costs on all water users and governments.

Regards,



Miranda Taylor

Director – Healthy, Safety and Environment