

Brief comments received

No.	Comment
1	<p>please remove any calculations or formulas that refer to "average flows" or "average rainfall", and please remove any necessity for forced environmental flows when there is zero flow in a river system. Please understand and take into account this is Australia and we very rarely have average anything, let alone rainfall or river flows and we do have frequent examples of zero flow in river systems. I am pretty sure someone wrote a fairly famous poem about droughts and flooding rains!</p>
2	<p>I am a solicitor and MPhil student at the University of Western Australia. I make this comment in respect of the need for national water law reform to support innovative options to improve water security, including managed aquifer recharge (MAR). It is consistent with the objectives of the NWI that State Government's enact legislation to facilitate MAR projects for environmental, economic and social benefits. However, the legislation Australia-wide is lacking. Only the NT and Victoria have specific licensing provisions to regulate aquifer recharge through injections or infiltrations. The WA State Government indicated in 2006 that it intended to introduce legislation to address (among other things) the fact that legislation in WA does not have a licensing provision to regulate MAR recharge. However, in late 2023 the WA State Government decided not to proceed with its Water Reform Bill, stating that the current legislation is workable. Reform is required to ensure that MAR projects are supported through a robust legislative framework Australia-wide. That framework must provide MAR operators with sufficient certainty and security to justify their investment, while also allowing the relevant regulator with sufficient power to ensure that any risk of harm occurring as a result of a MAR project is minimised.</p>
3	<p>The NSW Water Directorate relies on its submission (sub037) to the Productivity Commission in 2020 and welcomes the opportunity to discuss town water and sewerage matters with the Productivity Commission on behalf of communities across regional NSW.</p>
4	<p>The Commonwealth water act 2007 is only possible because of the external affairs powers it also has objectives which include; 1) be in the national interest. 2) optimise economic social and environmental outcomes and 3) maximise economic outcomes. Considering economics should be optimised and maximise in the national interest. I would consider international agreements for Free Trade must be complied with amongst others. In Australia, water is owned by the state governments. Usually when state, local and Commonwealth governments dispose of assets it is through a market process to obtain the "highest value use" outcome. Water for irrigation is the exception. After the available water distribution (AWD) irrigation water is socialised across irrigation groups (high, General, supplementary, unregulated, floodplain harvesting). Each individual irrigator receiving the same percentage of their license. This water is at zero value, then some administration/ delivery costs are added. This water at zero value is not going to the highest value use or optimising economic outcomes or maximising economic outcomes. It is in fact subsidising the defining cost of production of the irrigation industry which enables irrigators to sell produce at below the 'real' cost of production and gives an unfair marketing advantage versus dryland produces from within states</p>

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	<p>and between states and overseas trade. This surely breaks constitutional trade rules and free trade agreements and isn't in the National Interest. Foregone state government income could be used for social and economic outcomes in The National Interest e.g native title water. Agriculture is a price taking industry so when one small group can sell below the real cost of production it decreases the profit of the majority being dry land producers. This declined profit harms rural communities economically, socially (jobs) and environmentally and is against the National Interest. One perverse outcome is the Canadian pension fund which controls about 15% of the water in the Murray Darling basin receives its water for nothing from the state government and the fund can instantly sell this water and pay Canadians their pension leaving the New South Wales government unable to help in this cost of living crisis. Water welfare must stop</p>
Post-interim	
5	<p>NWI renewal advice 14.2 states that "Economic viability should be demonstrated by a positive benefit–cost ratio determined through a transparent and rigorous cost–benefit assessment..". A ratio in this context will always be positive because both the numerator and denominator are positive. Although there are different circumstances where a net present value > 0 or benefit-cost ratio > 1 would be the preferred criterion in cost-benefit analysis, the text should be corrected as follows: "Economic viability should be demonstrated by a benefit–cost ratio greater than one..."</p>
6	<p>The hackneyed (and misleading) statement 'Australia is the world's driest inhabited continent' at page 12 of the National Water Reform 2024 Interim Report (Overview) is more evidence that when it comes to water policy normal standards do not apply. Correction, 'inhabited' continent. Even worse.</p>