# Water Reform 2020 comments

The current approach in the draft reports is grossly incomplete because it fails to adequately reflect the statutory definition of 'water resources'.

'Water Resources' are explicitly defined in the Commonwealth **Water Act (2007)** as follows:

> ***water resource*** means:
>
> (a) surface water or ground water; or
>
> (b) a watercourse, lake, wetland or aquifer (whether or not it currently has water in it);
>
> **and includes all aspects of the water resource (including water, organisms and other components and ecosystems that contribute to the physical state and environmental value of the water resource).**

Thus, any proper strategic consideration of managing the water resource is broader than just managing the quantity of water, but also encompasses managing the habitat and water quality, managing the aquatic organisms; managing the waterway is **not** a 'complementary activity', but an inherent part of managing the water resource and this should be articulated in detail in a revised NWI.

This concept supports part of the submission by the Wentworth Group of Scientists:

> '*Greater investment is needed in non-volumetric freshwater ecosystem conservation measures that will increase resilience of biodiversity under a changing climate. The NWI should include provisions for such measures including: restoration of indigenous vegetation along riparian corridors, removal of redundant infrastructure, removal of structures which reduce connectivity on floodplains where possible, provision of fish passage, and thermal pollution control devices. ….*'
>
> (Wentworth Group of Scientists submission)

Many of the activities necessary to manage, for example, aquatic organisms will go beyond volumetric matters, and could likely consider pest species, habitat protection, over-fishing, water quality, inter-Basin transfer (eg from the Snowy system), etc.

Despite the above, the current draft reports have some limited recognition of the need of water planning processes to better deal with water quality matters.

> 'water quality issues are better incorporated into water planning, particularly in drought scenarios'
>
> (from: *Findings, recommendations and renewal advice, Water entitlements and planning*')

(Although, as discussed above, water quality management should be looked at holistically, not just in relation to drought conditions, or drinking water supply).

It should be of concern that similar recommendations were made:

- In the 2018 review by the PC on Water Reform:

  > *Water planning provisions should be updated to more explicitly provide for water quality and the interaction with water quantity.*

- in the 2011 NWI triennial assessment:

> *Water quality objectives should be more fully implemented into the reform agenda, with better connections between water quality and quantity in planning, management and regulation to achieve improved environmental outcomes…*

- In the 2014 NWI triennial assessment:

  > *Water quality should be incorporated into water planning to achieve more resilient environmental and economic outcomes*

- In the 2013 strategic direction paper[1] prepared by the Standing Council on Environment and Water (SCEW) for COAG (Sn. 4) which identified the need for:

  > *better integration between water quality and quantity in planning, management and regulation frameworks to achieve improved environmental, economic and social outcomes*.

The fact there has been little progress in the last 10 years or more is worthy of a greater emphasis.

[1] 'Next Steps in Water Reform: Preparation for the Future' SCEW, 2013.