

27 April 2012

Mr I Robinson  
Commonwealth Environmental Water  
Department of Sustainability, Environment, Water,  
Population and Communities  
Via Email: ewater@environment.gov.au

Dear Ian

### **Commonwealth Environmental Water: Trade Arrangements Discussion Paper**

The National Farmers' Federation (NFF) welcomes the opportunity to comment on the above discussion paper. The focus of the NFF's feedback is to ensure that there are positive outcomes for irrigators from their engagement with the Commonwealth Environmental Water Holder (CEWH). In particular, the NFF is seeking assurances that individual irrigators, who choose not to participate in trade to or from the CEWH, will remain unaffected.

With the transfer of substantial water entitlements to the CEWH with an objective to improve the security of water for the environment and to deliver improved environmental outcomes, it is imperative that the conduct and operation of the CEWH is above reproach. The way in which the CEWH engages in the water trading market must be undertaken in a way that is open and transparent. NFF would like assurances that the CEWH is clear in how it will engage in the water market, including when, information, protocols and practices. This clarity should also extend to the full operations of the CEWH.

It is also imperative that there will be no negative consequences to entitlement reliability or other perverse impacts for those who choose not to participate in the trade of water entitlements and allocations between irrigators and the CEWH. NFF is of the view that the proposed Basin Plan provisions (specifically regarding accounting for water take in Chapter 9) will have no impact on entitlement reliability.

For further information relating to the NFF position on this matter, please contact the NFF Manager for Natural Resources Management, Deb Kerr, on (02) 6269 5666.

Yours sincerely



**MATT LINNEGAR**  
**Chief Executive Officer**