

5 March 2015

Mr Ian Prosser
Chair
Interagency working group on
Commonwealth Water Information Provision
Bureau of Meteorology
GPO BOX 2334
CANBERRA ACT 2601

By email: regulations@bom.gov.au

Dear Mr Prosser

Re: Review of Commonwealth Water Information Provision

Thank you for your letter dated 18 February inviting the National Farmers' Federation (NFF) to provide input into the interagency working group on Commonwealth water information provision.

NFF provides a unique viewpoint on water policy issues. On matters related to water and irrigation, NFF is the only national body that brings a 100% farmer-focused viewpoint. We represent the interests of farmers that are affected by water management decisions including irrigators, riparian and floodplain landholders.

NFF's grass roots members in many jurisdictions bear the ultimate cost of the regulatory burden imposed by the water information provisions of the *Water Act 2007* (the Act) and we are encouraged to see the Government take active steps to review these issues in more detail.

While the Act does not impose regulations directly on individual farmers, it does on the private irrigation infrastructure operators (IIOs) and State agencies who provide water delivery services to irrigation farmers. The cost recovery framework in many of these circumstances mean that the costs associated with collecting and reporting the information required by the Government are passed on to individual irrigators through fees and charges.

As outlined in our submission to recent review of the Act, in addition to determining where duplication is occurring, we encourage the inter-agency working group to explore where information collection is superfluous to the genuine data required to generate the information that is valued by end users. A comprehensive evaluation of the costs and benefits is required, not just an exercise in identifying and removing duplication.

NFF notes that water information requirements relating to the water charge rules are outside the scope of this working group. However, it is largely the overlap of reporting requirements between the BOM (under the Water Regulations) and the ACCC under the Water Charge Rules, Water Market Rules and the Water Charge (Infrastructure) Rules where there is duplication at the Commonwealth level.

NFF notes that IIOs have previously identified a range of specific provisions in the Act that add to the regulatory burden of their businesses, and that they will again make submissions to this process. NFF supports their views, and their request through their peak organisation National Irrigators' Council to have a more formal role in the inter-agency process. In NFF's view, detailed engagement with the IIOs would provide the best avenue for the interagency working group to best understand the concerns of the irrigation sector.

Should you wish to discuss NFF's submission further, please do not hesitate to Ms Jack Knowles, Manager Natural Resources Policy by telephoning 02 6269 5666 or by email jknowles@nff.org.au.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'ST', is positioned above the printed name and title.

SIMON TALBOT
Chief Executive