



*Comments on*

**Natural Resources Management  
(Review)  
Amendment Bill  
2010**

by

**SOUTH AUSTRALIAN FARMERS FEDERATION  
(SAFF)  
NATURAL RESOURCES COMMITTEE**

On

March 2010

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## Comments:

1. SAFF support the changes proposed in clause 4 (4) & (5) to clarify and simplify the prescription process.
2. SAFF strongly supports the proposed changes in clauses 6 (1), 6 (2), 7, 11 (1), 11 (2), 12 (1) & (2) which will allow the Council and Boards to run more efficiently.
3. While SAFF supports the changes of NRM group terms at clause 15 from 3 years to 4 years, SAFF only supports members being able to serve up to eight consecutive years as there is a need to promote change-over and input of new ideas.
4. SAFF strongly supports changes at clauses 17 (4) & (7) (3b) (3c) to provide for an economic impact statement to be included when a new levy is proposed.
5. SAFF also supports changes at clauses 17 (3) & (7) (3) to provide for a social impact statement when a new levy is proposed or when increases exceed CPI.
6. Whilst SAFF supports changes proposed at clause 22 (1) to bring South Australia into line with the National Water Initiative, it needs to be recognised that some Water Allocation Plans may need to be reviewed sooner if the current science is incomplete, if trigger points are reached or if there is a significant increase in some water affecting activities, eg plantation forestry. A review period of 10 years is way too long and unrealistic.
7. SAFF cannot support the changes proposed at clause 28 (2). Instead SAFF supports the current position where the Minister makes the determination for the need to licence stock and domestic water use. SAFF does acknowledge that there are some areas where stock and domestic water use is a significant component of total water use and that there may be a need for licencing in these areas. However, SAFF does not support this policy being applied on a state-wide basis.
8. If a prescribed condition on a permit is breached, SAFF would prefer the option of challenging the breach in court as opposed to an expiation fee penalty as per clause 29 (3).
9. SAFF does not support clause 38 whereby water conservation measures will be established by Gazette notice rather than by regulation. Regulation provides the opportunity for debate, which is highly important for issues such as Environmental Protection Zones in the South East.