Director, Murray-Darling Basin Inquiry, ACCC, GPO Box 3131, Canberra ACT 2601.

Submission to Murray-Darling Basin water markets inquiry-interim report by the ACCC.

- I, Robert Caldwell, make this submission to your Water Markets Inquiry because there are a lot of serious flaws in Water Reform.
- A Highest Value Use Water Market will escalate the price of Water and deprive a lot of irrigation businesses of water.
- Irrigation Water for Drought Relief will cease because of the holding costs and loss of a reliable allocation.
- The separation of Water from Land allows Bankers to pressure for the sale of Water Assets.
- Water Reform started in 1994. The last 25 years of Allocation Announcements vs Inflows (Yield) are much smaller than the previous 50 years. (These are actual figures).
- The Planning Horizon for Large Dam allocations has been increased from 2 year to 4 years.

 New allocation announcements are only half what they used to be.
- I think the Federal Dept of AFFA and ABARE are incompetent in recommending Water Reform to Government. They have lifted some Half-baked U.S economic theory and applied it to Australian Agriculture. It will fail completely. The country will be worse off, including the Environment.
- The \$13 Billion incentive by the Howard/Costello Government to the States could be construed as a bribe. The result is reduced production and a loss of assets.
- I take the contrary view to the ACCC and believe the price of water should be kept as low as possible.
- I think there is no place for Speculators or Water Brokers, they only increase the price of water.
- Carry Forward is bad news and should cease at the end of this water year.
- People holding carry forward water reduce the pool of water available in the New Year for next years allocation. Many will sit on water, speculate, and wait for a higher price.
- Foreign ownership of water assets is the latest investment rush.
- So your 500 pages of Market Considerations (Interim Report), is wasted because you have overlooked Volume available, Reliability and the Rising Price of Water.
- I have said before that assuming inflows of 99% Exceedance and planning for 4 years wastes 75% of the water in Storage. Evaporation and transmission losses are ignored.
- I think your terms of reference are too narrow and you have ignored the fundementals.

Kelaldwell 27-8-2020

Yours sincerely

Robert Caldwell