



06 August 2013

Your Ref: WS Op Licence Our Ref: ARRM/WPP/ERA Enquiries: L. Chalmers Date: 7 August 2013

Assistant Director Licensing Economic Regulation Authority PO Box 8469 Perth WA 6849 publicsubmissions@era.com.au

Dear Sir/Madam

Proposal to amend Water Services Operating Licences

The Department of Agriculture and Food (DAFWA) welcomes the opportunity to provide comment on the proposal to amend Water Services Operating Licences.

DAFWA recommends that the operating licences consider the application of water restrictions and disconnection policies in the context of animal welfare. There may be animal welfare issues if water was disconnected resulting in the loss of livestock. This is particularly an issue for intensive livestock industries which are dependent on scheme water for cooling and drinking water

DAFWA administers the *Animal Welfare Act* 2000 (the Act) in partnership with the RSPCA WA. The administration of the Act involves ensuring compliance by people in charge of animals with industry standards and where necessary enforcement actions if those standards are not being met. It is important that people in charge of animal's water supply options are able to meet their obligations under the Act, and Water Service Operators policies do not lead to adverse animal welfare outcomes. Water Service Operators policies need to consider how they would reasonably ensure animal welfare in collaboration with their customers and animal welfare regulators.

Yours sincerely

John Ruprecht
EXECUTIVE DIRECTOR