



Inquiry into Water Resource Management Charges
Economic Regulation Authority
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We are a self-supply water user in agriculture in Pemberton which is in the Warren and Donnelly River catchments.

We are concerned that 40 gigalitres (5%) of the 742 gigalitres mean annual outflow is allocated to surface water licences and 95% of the water for the environment is flowing into the Southern Ocean.

Our dams have been privately funded. We are concerned at the impost of metering and paying for water control that we will have to self manage and self fund. We are concerned that water being traded away from land title will adversely affect the value of our land as a horticultural or viticultural enterprise.

We believe that this Inquiry should not be conducted before the *Water Resources Management Bill* is publicly debated or enacted by State Parliament.

Questions for us include:

- Will the *Water Resources Management Act* extend licensing from in-stream dams to include dams capturing springs and overland flow or runoff?
- Will the *Act* include a requirement for a water licence for water accessed by tree plantations?
- Will the requirement for a water licence for tree plantations apply to both existing and new tree plantations if the same approach is to apply to both existing and new dams on springs and capturing runoff?
- Will the *Act* require mandatory metering and collection of water metering charges?
- Will the *Act* extend water licensing state-wide beyond the proclaimed Warren and Donnelly catchments (Manjimup and Pemberton areas) to include Bridgetown, Nannup, Frankland, Boyup Brook, Denmark, Mount Barker, Albany, Williams, Kojonup and many other farming areas that are not proclaimed areas?

Outcomes on these matters raise vital equity considerations related to anti-competitive costs imposed by government.

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It is not fair or equitable that 150,000 garden bores in Perth using 120 gigalitres of water may not be included in any water licence fees and charges system applied to food producers in regional WA.

The Inquiry should be halted until these matters are resolved by State Parliament and the *Water Resources Management Act* is enacted.

In brief, we believe that:

1. Water is vital to all communities and most economic activity in regional WA.
2. Water is owned by the Crown and the Government should fund resource management and planning from the General Fund derived from State and Commonwealth taxes we pay.
3. Specific charges imposed on water licence holders for 'water resource management' (including planning) are opposed.
4. Where an allocation of water is sought, an 'Application Assessment Fee' could be required which reflects the complexity of Department of Water assessment for the particular dam or bore and water resource; with the applicant to receive a quote for assessment related to hours of service and fee per hour, and be able to appeal to a senior officer of the Department if the quote is unacceptable.
5. Upon allocation of water, a 'Water Licence Fee' could be required which reflects cost recovery of administration of a licensing database (analogous to a drivers licence). A 'Water Licence Fee' at a higher cost than a Drivers licence fee is opposed.
6. A 'Licence Renewal Fee' at end of licence duration (usually 10 years) could be required; this would re-present the 'Water Licence Fee' (analogous to the renewal of a Drivers licence). If a relevant Statutory Water Management Plan identified particular water resource was over-allocated because of diminished resource, a re-assessment could be required and be subject to the same transparent fee process as an initial application.

Given the diversity of water resource regions, infrastructure and uses in WA, it is vital the Economic Regulation Authority conduct hearings in major water resource regions during the course of the Inquiry.

Regards

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