

12th June 2009

Inquiry into Water Resource Management Charges

Economic Regulation Authority

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I am writing as Secretary of the Pemberton Wine Region, representing over 40 growers and winemakers in the Pemberton/Manjimup Region.

Our members are unanimously concerned about the proposed changes in the Water Resources Management Bill which is currently open to public submission. Our dams and similar dams built for horticulture in the Warren and Donnelly catchments have been privately funded; there have been no public subsidies as for water for agriculture at the Ord River, Harvey irrigation district and Carnarvon.

Relevant matters 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 Act require mandatory metering and collection of water metering charges;
will the Act extend water licensing statewide beyond the proclaimed Warren and Donnelly catchments?

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

Brief submission on potential fees and charges raised in the Issues Paper for the Inquiry:

1. Specific charges imposed on water licence holders for 'water resource management' (including planning) are opposed.
2. Where an allocation of water is sought, an 'Application Assessment Fee' could be required with the applicant to receive a quote for assessment. Would the applicant be able to appeal to a senior

officer of the Department if the quote is unacceptable?

3. Upon allocation of water, a 'Water Licence Fee' could be required and the licence holder could opt to pay either annually or 10 years in advance. A 'Licence Renewal Fee' at end of licence duration (usually 10 years) could be required; this would re-present the 'Water Licence Fee' Drivers. If a relevant Statutory Water Management Plan identified a particular water resource was over-allocated because of diminished resource, a re-assessment could be required and be subject to the same fee process as an initial application.

4. 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.

We are considerably concerned about the proposed changes and look forward to preparing a full submission in September when the draft report is released.

Regards,

Sue Hancock, Secretary

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