

Inquiry into Water Resource Management & Planning Charges  
Economic Regulation Authority  
PO Box 8469  
Perth Business Centre  
PERTH WA 6849

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Turf Growers Association WA  
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Submission – ERA Inquiry into Water Resource Management & Planning Charges

The Turf Growers Association WA (TGAWA) appreciates the opportunity to formally respond to the *ERA Inquiry into Water Resource Management & Planning Charges*.

The turf and affiliated industries employ some 16,000 plus employees in WA. Annual turnover for the industry at large is about \$1,600,000,000. These figures include Growers, Lawn Mowing Contractors, Bowling Green Keepers, Golf Course Keepers, Turf Maintenance, Landscapers, Irrigation workers, Fertilizer industry, Public & private schools, TAFES and Universities.

The TGAWA is aware of the National Water Initiative (NWI) and that this initiative is the blue print for national water reform. We understand that the NWI lists water pricing, including full cost recovery, as a key element of water management. The NWI Section 67 states that the territories and states of Australia bring into effect consistent approaches to pricing and attributing costs of water planning and management by 2006. Currently WA is not compliant with this section of the NWI.

There are imminent legislative changes regarding the function of the Department of Water in WA which will see the meeting of compliance requirements for the NWI. The assumption is that significant changes to water management in WA will be inevitable as a result.

The above mentioned discussion paper seems to be indistinct regarding current legislation and the proposed Water Resource Management Bill. The TGAWA wishes to highlight the need for consistency in definitions between the ERA, the Department of Water and the NWI. There must be transparency and clarity from the ERA regarding the extent to which it intends to consider water resources management charges in WA.

Areas of concerns and recommendation, as users of ground water for production purposes, are as follows;

- That there is fairness and equity in costs charges and sharing.
- Volumetric charging is not supported.

- That fee setting and the expenditure on service delivery is transparent and accountable and that appropriate arrangements for independent scrutiny and review are put in place. Cost allocation must be clearly linked to the activity and cost efficiency a priority.
- Ensure that water license administration fees and future water resources management and planning charges be capped appropriately. Prevention of uncontrolled increases in cost burden to those affected by cost charges must be ensured.
- Support fairness and equity with water licensing rights.
- Ensure that trading of water allocations benefits the community and not just those who place “highest value” on water.
- License metering costs to be determined at time of license issue and not post issue.
- Support the notion that licensing should be required only if the benefits to society exceed the costs.
- Shared costing supported if costs are incurred to provide goods that are a mixture of public and private goods.
- As a monopoly provider, ensure that efficiently incurred costs only to be recouped by Dept of Water.
- Support best environmental practice for water extraction, monitoring and management.
- Support Industry Development for Water (separate to existing Industry Development Officers employed by private sector and in infrastructure). The TGAWA suggests that expense for Industry Development be included in licensing fees.

In conclusion, the TGAWA supports sustainable water management and monitoring of water as a most valuable societal asset. The TGAWA supports best practice at all levels within industry, government and community to sustain and replenish the States ground water supplies. The turf industry believes that the sustainability of future water requirements’ needs to be balanced with environmental, economical, health and social sustainability and urges our government to adhere to this.

Yours sincerely,

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