



SHIRE OF MUKINBUDIN

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Our Ref: UT.WA
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Contact: Trevor Smith

6 July 2011

Mr Mick Geaney
Assistant Director, Licensing
Economic Regulation Authority
P O Box 8469
PERTH BC WA 6849

By Email: publicsubmissions@erawa.com.au

Dear Mr Geaney

Proposed Amendment to Water Corporation Operating License

Thank you for the opportunity to comment on the Water Corporation's application to amend Water Operating Licence 32.

Despite the short time frame in which we are supposed to make a considered response there are a number of issues that immediately become apparent should the Water Corporation be allowed to reduce services.

1. Watering of Stock

The Shire of Mukinbudin has recently undertaken, at the State Government's request, a census of stock numbers. The purpose of this census was to ensure that adequate water supplies would be available, especially during the recent drought experienced in the Wheatbelt area.

The largest sheep farmer in the Shire has a flock averaging 10,000 head. The average flock size of the top 50% of farms would be around 3,000 head. In summer a sheep needs to drink five litres of water per day. For an average flock that requires a water supply of 15,000 litres per day. The proposed minimum flow of 3kL/day will not provide an adequate water supply and either stock will suffer or farmers will need to cut back on stock numbers thereby reducing the viability of farming in the Wheatbelt.

2. Spraying

A quick survey of farmers indicates that to spray 1000 hectares of crop requires an average 50 kL of water. With a typical cropping program having an average crop size

of 4000 hectares that requires 200kL of water. A typical season requires a farmer to spray at least three times being a knock down spray, post emergent spray and summer spray. At 200kL of water per spray, even a ten day spray program requires at least 20kL per day, or three times the proposed minimum water flow.

3. Emergencies

The proposed minimum flow has the ability to impact on water supplies for bush fire emergencies and the ability to refill fire tankers and fast attack vehicles. An inability to refill these vehicles where required could have serious implications for life, property and stock losses.

Alternative Supply

A further consideration in the water supply debate has been the apparent desire of the Water Corporation to decommission as many alternative water supplies as possible over the past years. In the Shire of Mukinbudin these have generally been rock catchments which provided a good reliable supply of water of a quality that was certainly able to be used for stock and spraying and in a lot of cases (until recently) provided households with water as well.

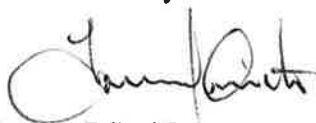
If the Water Corporation is genuinely concerned about saving water then investing in the maintenance of these off scheme water supplies should be a priority.

Water Pricing

The Water Corporation has, since 2008, been introducing new water charges for country services to “better reflect the total cost of providing water in country areas and to encourage customers to save water by ensuring they are aware of its cost”. The Shire of Mukinbudin has previously written to the Minister for Water protesting about the increased charges for rural areas. Now it appears that paying exorbitant prices for water is not enough and the Water Corporation wishes to restrict the availability of water. Perhaps it would be informative and useful for this debate for the Water Corporation to publish all of its pricing mechanisms and how much water is used by other groups such as industries in the Perth industrial areas.

Instead of insulting farmers by saying that increased prices and restricting flows will ensure that they are aware of the cost of water this message should be sent to all users. Farmers would be the one user group who would be the most informed of the value of water and the devastating effect of not having an adequate supply.

Yours sincerely



Trevor J Smith
Chief Executive Officer

c.c. Minister for Water
Minister for Agriculture
Member for Central Wheatbelt