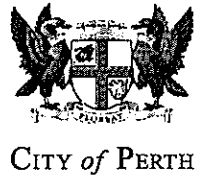
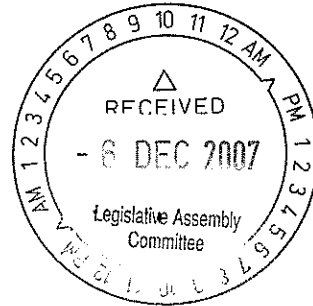


WLS SUB 12.



Enquiries to: Doug Forster
Business Units Directorate (9461 3109)
Email: douglas_forster@cityofperth.wa.gov.au
Our Ref: P1016714
Your Ref: Doc. No. 7658 V1



6 December 2007

Dr. Loraine Abernethie
Principal Research Officer
Economics and Industry Standing Committee
11 Harvest Terrace
West Perth WA 6000

**PARLIAMENTARY INQUIRY – WATER LICENSING AND SERVICES
SUBMISSION TO ECONOMICS AND INDUSTRY STANDING COMMITTEE**

Dear Dr. Abernethie

Please find attached a submission from the City of Perth in reply to your letter of invitation dated 16 November 2007.

The comments within the attachment are generally self-explanatory, however should further detail be required please contact myself on 9461 3109.

Yours sincerely

DOUG FORSTER
DIRECTOR BUSINESS UNITS



**PARLIAMENTARY INQUIRY – WATER LICENSING AND SERVICES
SUBMISSION TO ECONOMICS AND INDUSTRY STANDING COMMITTEE**

The responses which follow are in answer to the seven questions posed in the letter dated 16 November 2007 from the Hon. R.C. Kucera.

Q1. Benefits of licencing system

A1. The taking of water from an underground aquifer or stream flow needs to be controlled by a central body. Self regulation is insufficient.

Q2. The cost for administration of a current water licence system

A2. Insufficient information is provided as to the costs incurred by the Department of Water for the current water licence system, therefore, no comment is offered.

Q3. The extent to which the water licence administration fees meet cost recovery requirements of the National Water Initiative (NWI).

A3. The City of Perth is not in a position to make constructive comment.

Q4. The penalties applied to WA under NWI if no cost recovery occurs.

A4. There is a strong argument that cost recovery for services to water users by the Department of Water should occur.

Q5. Licence administration fees applying to residential bores.

A5. The use of unconfined aquifers for domestic irrigation purposes reduces the draw-down on main supplied potable water.

Domestic bore use should be governed by the restrictions applied to mains water, with some additional benefit, for example, able to be used three times per week.

Education on the use of unconfined aquifer draw-off should be a priority to inform people that the source should be used sparingly.

Q6. Cost incurred by landholders harvesting water.

A6. The construction of farm dams should be recoverable through the taxation system as it enhances the productivity of agricultural land and the growing of food for the Australian population. No licence fee should apply.

Taking water from streams or rivers which have downstream user dependence needs to be adequately managed. Recovery of the management costs is reasonable. The application of a licence should relate to the annual drawn-down volume with no fee applicable to small quantities.



CITY of PERTH

Q7. The extent which NWI provides for different licencing systems.

A7. No comment.

Should you wish to discuss any aspect of the above, please contact the City's Director Business Units, Doug Forster on 9461 3109.