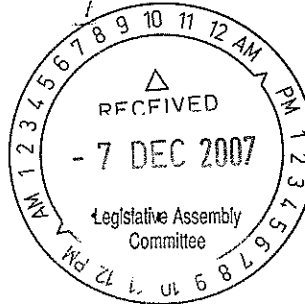


Shire of Manjimup

Our Ref: DEP23
Your Ref: 7658 V1
Enquiries: Jeremy Hubble



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A B N 36453349691

7 December 2007

The Hon R. C. Kucera
Chairman
Economic and Industry Standing Committee
WA Legislative Assembly
Parliament House
PERTH WA 6000

WLS SUB 17

By email: laeisc@parliament.wa.gov.au
Attention: Dr Loraine Abernethie, Principal Research Officer

Dear Mr Kucera,

Parliamentary Inquiry – Water Licensing and Services

Thank you for your letter of the 16 November 2007 (received 22 November 2007) inviting the Shire of Manjimup to make a submission in respect of water licensing and services.

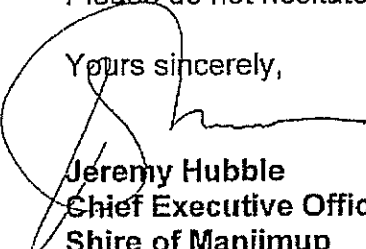
The Manjimup Shire Council previously made a submission on this matter to the Minister for Water Resources, the Hon John Kobelke, on the 5 April 2007 and those views remain unchanged. A copy of this submission is attached and represents Councils submission to the current inquiry.

Since making the original submission, Council notes and welcomes the alternative fee structure recently introduced. Whilst the alternative fee structure represents a reduction to the absurd fees previously proposed, the changes do nothing to address:

1. the discrimination between urban water users (particularly those with bores) and rural commercial users, and
2. the equity issues raised in the submission regarding the relative impost on self providers of water compared to large commercial providers of water.

Please do not hesitate to contact me should you have any queries.

Yours sincerely,


Jeremy Hubble
Chief Executive Officer
Shire of Manjimup

Shire of Manjimup Centenary 1908 - 2008

File No: DEP 23
Enquiries:

5th April 2007.

Hon J Kobelke BSc, DipEd, JP, MLA,
Minister for Water Resources,
20th Floor,
197, St Georges Terrace,
PERTH W. A. 6000

Dear Minister,

BLUEPRINT FOR WATER REFORM IN WESTERN AUSTRALIA.

In response to the discussion paper on the draft of this document circulated in July 2006, Council made a response in form of a letter dated 25th August 2006 a copy of which is attached for convenience of reference. The actions that have occurred since that time give Council no comfort that its views among many others in this district are being given any credence.

While receipt of a submission from Council is acknowledged in the "Final Advice to the Western Australian Government on the Blueprint for Water Reform" document (Final Advice Document), no separate consideration or distinction appears to have been drawn between conditions prevailing in the Manjimup area and those affecting other parts of the State where conditions are significantly different.

The recent release of the Final Advice Document and the Government Response to a Blueprint for Water Reform Document (Government Response Document) appears to have changed nothing of significance. This leads to the conclusion that Government is moving ahead with its predetermined agenda paying only lip-service to the concept of consultation with apparently no regard to the inequities that the proposed system will generate.

These inequities will occur between those in country districts and those in Metropolitan areas. Country land owners use water from dams they have constructed at their own expense to generate income from their land (and potentially having to pay for the privilege of doing so) thus contributing to the economy. Metropolitan land holders, on the other hand, are subsidised by Government, as the Council understands the situation, to construct bores to reticulate private gardens with water that is neither regulated, nor any charge levied so as to reduce the use of reticulated water from mains' supply. The latter usage of water contributes nothing to the economy.

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Country users in the Warren Catchment Area draw only 36 gegalitres of water annually from water sources whereas 120 gegalitres is drawn from 140,000 metropolitan bores without restriction. It is totally inequitable to perpetuate such a disparity in access to water and if country water users are to be charged for water use then that should apply equally to metropolitan water users at the same rate. This should lower the overall rate of contribution if such a system is to be introduced.

Much of the Manjimup area is proclaimed and already licensed and is subject to very small allocations (understood to be of the order of 23% of the total water resource for the catchment). The current water management arrangements have been very effective over time and have been commended by State Government agencies.

This distinguishes it from most other regions and serves to reinforce Council's view that it can be left to operate as it does at present without any of the administrative superstructure that is proposed in the models now being put forward. Why such an arrangement is to be discarded when separate legislation is to be developed to secure irrigation projects, defies justification. Is agriculture in non-irrigated areas to be viewed as inferior to or less important to irrigated agriculture? If so why? The whole proposal, at least insofar as it relates to this area, appears to be regulation for regulation's sake with no cost-benefit analysis to demonstrate its worth.

At Recommendation 26 in the Government Response Document, reference is made to the South West Land Division and to actions that may be appropriate in the licensing of dams. Such a one-size-fits-all approach fails to recognise significant variations in catchment characteristics in different parts of that Region and is far too broad to be realistic in the approach to be taken.

It is noted in the booklet entitled "Designing a Sustainable Water Future – The South West Water Plan – An Invitation to Participate", the South-West Region is differently described and represents a smaller area but still encompasses, for example, a wide range of rainfall patterns and differing catchment districts. It is submitted that much of that area has little commonality with the Manjimup area and that characteristics distinctive to variations between catchments, higher rainfall districts and the like should be separated for differing treatments.

It is noted at Recommendation 24 in the Government Response Document that forestry plantations will be accounted for in the management of water resources but only states that statutory water management plans may require water used for plantation forestry operations to be licensed.

Council is advised that plantations intercept some 30% of the water running off the property on which it is established with predictions in some instances that plantations use most if not all of the water that penetrates the ground leaving little if any water to recharge underground water bodies. With such high usage being made of water under that form of land management, it is imperative that plantations be licensed as any other water user.

The intention to separate titles for water from titles for land is an issue that Council views as being fraught with difficulties. Conceivably, it will be possible for titles in water to be bought and sold without regard for the proper management and use of the land upon which it is collected and stored, especially if the value of water is seen to be of significantly greater worth off-site than using it for the proper management of the land itself. Such actions would conflict with sensible natural resource management in ensuring the best possible use of land.

Council wishes to express its grave concern that the proposals for charging land owners' water licence fees from 1st July 2007 are excessive and inequitable for the reasons already espoused and could have negative effects on the economy of agricultural operations across the region already struggling for survival.

The increase in water licence fees and compulsory metering unfairly targets the rural sector with additional charges that it can ill-afford to pay especially in the current economic climate.

You are urged to take the representations from this area seriously into account and, at the very least, remove from the proposals those measures that impact so unnecessarily on rural land holders within the Shire.

In order for these issues to be discussed and reinforced, Council, as represented by the Shire President, the Deputy Shire President and myself, seeks an appointment with you and would welcome contact from your office to arrange a suitable date and time. I can be contacted on 9771 7711 to arrange a meeting.

Yours sincerely

VERN McKAY
CHIEF EXECUTIVE OFFICER