



Shire of Mt Marshall



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IN REPLY PLEASE QUOTE: MG11-147 FILE: A6/25
ENQUIRIES TO: Mr MATTHEW GILFELLON

6 July 2011



Mr Mick Geaney
Assistant Director, Licensing
Economic Regulation Authority
PO Box 8649
PERTH BC WA 6849

Dear Mr Geaney

Proposed Amendments to Water Corporation Operating Licence

Thank you for the opportunity to comment on the Water Corporation's application. The Shire of Mt Marshall supports the submission made by the Shire of Trayning. I have attached the submission for your convenience.

Should you require any further information, please do not hesitate to contact me during business hours.

Yours sincerely

Matthew Gilfellon
Chief Executive Officer



SHIRE OF TRAYNING

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Our Ref. NM/BMT:

Your Ref.

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

Email publicsubmissions@erawa.com.au

5 July 2011

Dear Mr Geaney,

Proposed Amendments to Water Corporation Operating License

Thank you for the opportunity to comment on the Water Corporation's application to have its Water Operating Licence 32 amended so that it can lessen the minimum flow to farmland services in our region that are serviced by the Goldfields and Agricultural Water Supply.

However, I would register our strong disappointment at the unreasonably short response time for a matter that will affect virtually every farmer in the Goldfields and Agricultural Water Supply area, that has a connection.

The application has major ramifications for farmland, both stock watering and emergency services, and threatens both the livelihood of farmers and capacity for fire-fighting in an emergency.

Water Corporation appear to have placed little value on either of these critical aspects of rural life and business –

1. Spraying programs

If the amendments are allowed, our farmland services will be reduced from 11.2 litres/hectare/day **and** 3 kL per occupied house to just 3 kL per service.

Quite a few farms have just one water service, and these farms are of 2,000 to 3,000 hectares, often running several thousand sheep. Some of these farms can require 20 kL in a day just for crop spraying, and the Water Corporation is suggesting that their allocation should be cut to just one seventh of that required.

The amendments will greatly hamper cropping if water is not available for spraying of herbicides, fungicides and insecticides, resulting in crops of lesser quality, and potentially reducing yield.

2. Watering of stock

The proposal places the welfare of animals at great risk. Sheep drink four or five litres of water each per day during summer.

A flock of just 3,000 sheep in a summer such as that just passed where stock watering is needed for weeks and months at a time, means at 15 kL is required per day every day,

Without assured supply of water, the Water Corporation's proposal means that sheep and cattle farming will be seriously curtailed, or alternatively, the sheep are left to die of thirst.

3. Emergency supply

The certainty of fire emergencies seems to have evaded consideration. Unfortunately every community suffers fire emergencies each summer, when vehicles from many parts of the Shire converge to fight the fire.

This proposal will mean that each farm, once the initial supply on board each fire fighting vehicle is used, will be able to fill either one 4WD grass fire tanker, or three 1,000 litre fast attack units, before having to head off to the next farm, to use up their allocation, and then find another farm for a third allocation.

Clearly such a restriction and the resultant confusion and frustration from not being able to refill fire fighting vehicles where they are needed, places life, property, livelihood and farm stock at risk.

4. Alternative supply

I was advised recently of a proposal by a private company to tap into water in the Esperance area, pipe the water to Kalgoorlie, thus drought proofing Kalgoorlie by providing a second water source, but also relieving pressure on water supply all along the Mundaring-Kalgoorlie pipeline.

While I understand that the Water Corporation would be extremely reluctant to lose its monopoly, for the benefit of the State and the communities served, surely this would be a far preferable option than to place thousands of farms and businesses that rely on farms under threat. Aside from the obvious benefits of additional water and an additional source, it was to have been privately funded, and therefore not relying on taxpayers to fund either infrastructure or any future loss.

The farmers out this way are not Avon Valley hobby farmers that can cope with such unreasonable reductions of water supply. Farm dams are not the answer, because modern farming practices such as no-till have greatly reduced the run-off from farmland that is needed to fill our dams.

Farm dams are seriously compromised with our obviously drying climate. Given the climatic trends in the South West Land Division over the last thirty years, water in sufficient supply must be assured, and the Water Corporation needs to be looking to increasing availability, not imposing on those who are literally at the beginning of the food supply chain.

Perhaps a good start would be to remove subsidies to large industrial consumers in Kwinana.

Accordingly, this Council would strongly recommend that the Water Corporation's application to reduce their service levels be rejected.

Please contact me if there are any further queries.

Yours faithfully



Niel Mitchell
Chief Executive Officer

c.c. Minister for Water
Minister for Agriculture
WA Local Government Association