



8 May 2023

Essential Service Commission

Email reception@esc.vic.gov.au

RE: Southern Rural Water Price Review 2023

Friends of Steele Creek was established in 1995 and has played a major role in:

- advocating to government agencies for improved management and protection of our urban waterway;
- educating the community on river health, pollution prevention, biodiversity, and the unique flora and fauna of our region.
- supporting Reconciliation Action Plans within our catchment.
- providing opportunities for volunteering e.g., Waterwatch, Drain Watch, Frog Watch, and revegetation projects.

Since 2015 we have been collaborated with Wurundjeri Woi Wurrung Narrap Team on landscape restoration projects with cross-cultural learning opportunities for volunteers.

Following Melbourne Water's successful Co-design Maribyrnong River Health Strategy in 2017 we initiated a Maribyrnong catchment-wide network to continue collaboration and monitoring and to implement our shared vision for an ecologically healthy the Maribyrnong.

In early 2018 Dr. Bruce Lindsay's report *A new deal for the rivers and waterways of Melbourne's west* summarised the multiple failures in water, planning and environmental policies that had contributed to the current parlous condition of the regions waterways. In August 2018 a Ministerial Advisory Committee on the Waterways of the West was established. Its final report and recommendations were presented to Government in January 2020. The WOW Action Plan was announced in September 2021 and in March 2023 the first Annual report was released.

FOSC appreciates the opportunity to provide further input to the ESC on Southern Rural Water Price Review 2023.

In reviewing the ESC Pricing submission, we ask two overarching questions:

- Will this pricing policy provide a sufficient financial base for SRW to meet their regulator obligations?
- Will the ESC be fulfilling its regulatory responsibilities to ensure SRW has the financial capacity to deliver their regulatory responsibilities?

In particular we seek clarification from the ESC on the following points.

How will the proposed 4% cut to SRW's budget;

- Enable SRW to fulfill its Obligations under the Water Act to protect river health and ensure sustainable take in forecasted drying climatic conditions?
- Enable the delivery of the preliminary works (e.g. technical study, design concept, and business case) required for the completion of Rosslynne Reservoir outlet upgrade by 2032?
- Enable meeting the target of metering of 75% all surface water and ground water by 2025?
What is the exact metering target for the Maribyrnong catchment by 2025?
- Affect SRW's capacity to live up to its espoused ZERO tolerance of water theft? (Landowners in Lancefield area find it hard to recall the last time an officer visited there).
- Impact the roll-out of IT upgrades to improve monitoring of take?
- Impact the timely delivery of the small dams' study in peri-urban areas of the Upper Maribyrnong?
- Contribute to ensuring the continuing presence of the platypus in the Maribyrnong?

SRW does not have an office in the Maribyrnong catchment. Has the strong community dissatisfaction with SRW's lack of presence in the Maribyrnong been ignored? Does the ESC endorse SRW's omission of costings for the establishment of an office in the Maribyrnong catchment? If not, then what directions/ discussions are ESC having with SRW to address this long-standing request?

We note SRW plans to deliver the following outcomes for customers:

- Reliable water supply
- Sustainable water
- Great service
- Community value
- Fair and reasonable prices

We are deeply concerned that SRW will not have the financial resources it requires to fulfill its regulatory responsibilities to protect river health and establish sustainable take based on current and forecast future rainfall. The current level of take is based on historic rainfall records and this is

no longer a valid methodology. Furthermore, the State government's adoption of the Hutley position requires that Southern Rural Water and the ESC must come to terms with the huge water deficit described in the Central and Gippsland Sustainable Water Strategy. A moratorium on license to take is urgently needed. Current rainfall data shows the Maribyrnong has lost 25% and will lose a further 20%-40%. Reduced rainfall will also reduce groundwater recharge.

We respectfully suggest the ESC reassess the budgetary needs of SRW in light of its regulatory obligations. The loss of the Platypus from the Maribyrnong from low flows will be as a consequence of mismanagement - climate change will not provide a handy excuse when there is already ample evidence that the current level of take from the river is unsustainable.

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Spokesperson Friends of Steele Creek

Maribyrnong representative to the Board of Yarra River Association.