Response to ICRC Draft Report on Water and Waste Water (released on 3 December 2003)

The ICRC report does not appear to address two major areas. First the move to 'user' pays from ad valorem charges for water, without the necessary changes to policy together with implementation incentives to apportion consumption between users in dual occupancies and multi-unit dwellings.

Since the introduction of user pays sole occupants and couples, often very low income earners and disabled residents who remain more or less permanently at the one address, have been forced to effectively subsidise the water usage of groups and families in dual and multi unit occupancies including those at the ground level that may have a garden / court yard as part of their residential unit.

Most ACTEW utilities - power, gas and communications have the infrastructure/meters in place so that every household, including multi unit high rise developments, pay only for their own actual consumption. That water is treated differently from these other services is an anachronism left over from past practices when water consumption included a free component that the government used to have residents maintain a garden city by encouraging them to look after nature strips, hedges and private gardens.

Changes in community values as represented by government in its user pays policy have resulted in new ways of covering costs, extracting revenue and changing attitudes towards what was once regarded a plentiful resource but now a scare and limited resource.

Householders are also encouraged to be thrifty and to assist ACTEW and similar service providers' efficiency through the bundling of electricity, gas, telephone, broadband and pay TV services. Again Water is considered an exception where in reality it is being a charged on a usage basis. Water, and the associated abstraction charge, could also be 'bundled', with appropriate discounts and other incentives applied, to achieve particular outcomes such as reduced usage or essential usage only, but this is not presently possible for tenants.

It is an anomaly for a single provider to have two different methods of treating consumption-based services for which it has administrative responsibility. I.e. water where separate metering of consumers is not mandatory and electricity and gas where a meter per consumer is mandatory.

The lack of a consistent approach to water, as compared to other utility consumables, shifts the costs of variable water usage patterns to landlords. Many landlords recover the cost of water by increasing their rent, impacting less favourably on tenants who are careful users of water. Whichever way you look at it, it seems that landlords subsidise the water usage behaviours of their tenants except where they meet the onerous requirements to pass on the costs.

As for any other utility service, the water meter should be in the name of the resident householder, including where they are a tenant, and residents should be able to request a reading at the commencement and end of a lease as they are presently able to do for all other utilities. This anomaly should be addressed in consumer and residential tenancies legislation, possibly in Strata title legislation, and in development application regulations and the regulations governing ACTEW.

Second. The report misses the relationship to development in Queanbeyan at the expense of sustainable development in the ACT.

I understand that the 1927 statutes that established the facilities for the fledgling national capital made allowance for the provision of water to Queanbeyan on the basis that it was a rural hamlet that would not grow, and certainly not threaten the future development of Canberra. No other near-by rural NSW town or hamlet received such statutory guarantees for water supply.

It is a fact that the Queanbeyan City Council does not require separate water meters to residential units including to new (or on the plans) dual and multiple occupancies residential developments. It also backs up this policy by steadfastly refusing bodies corporate or owners of dual occupancies or multi-unit residences that were completed before, and since, the introduction of 'user' pays, who are prepared to pay for the retrospective installation of separate metering, to do this to allow separate billing to those units.

The direct result of the Queanbeyan Council policy is that developers are permitted to build multiple housing units where water is regarded as a plentiful resource and incentives to encourage less water usage fail to work because residents are not given feed back on their water use through individual billing according to actual consumption. The 'Waterwise' 'incentives' promoted by Council in fact have the opposite result as those family units that wish to use water excessively can do so knowing that they will not be individually billed for excessive use and that the community village with its single water meter is unable to act to discourage such behaviour because it cannot meter at the residential unit level.

I am sorry that I do not have the personal resources to follow through the 1927 legislation or statutes. However the National Library might have documented recollections by significant early Canberrans who developed the early water infra structure and accompanying legislation. I would doubt that any of them envisaged that Queanbeyan Council would have such a large influence on Canberra's development through adopting a water policy that caps the growth of Canberra and limits its capacity to maintain its essence as the garden city.

I would think that if the Commonwealth Government amended the 1927 statute that guaranteed water supply to Queanbeyan by requiring individual living units to have water meters, this would a start the process of reducing Queanbeyan Council's indulgence in limiting the development of Canberra and the ACT.

Yours sincerely

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