20th December 2019

Essential Services Commission of SA GPO Box 2605 Adelaide SA 5001

Sent via: escosa@escosa.sa.gov.au

To whom it may concern

RE: SA Water Regulatory Determination 2020

Conservation SA is an independent, non-profit and strictly non-party political peak body organisation representing more than 60 of South Australia's environment and conservation organisations. Conservation SA has been a strong advocate for the protection of nature and biodiversity, and the promotion and uptake of sustainable practices in South Australia since 1971.

South Australia and its water consumers are reliant on SA Water for our quality of life, environmental and economic outcomes. As such, planning exercises such as Waterproofing Adelaide and Water for Good have, in the past, allowed the community to engage with the long term challenges and planning for our water resources and the ongoing fairness issues of how water and its costs are allocated across our community. In the regulatory process for SA Water's 2020 determination the Conservation Council has sought to reinforce the critical importance of thinking beyond the 5-year regulatory period and providing transparency to South Australians of the future directions of the organisation.

We believe it is in the long-term interest of consumers for SA Water to:

- understand risks posed by climate change and competing water catchment uses to South Australia's long term water security, both for consumer direct use and for the vulnerability of our environmental and biodiversity assets, upon which our community depends

- work with its stakeholders to explore options that improve water security and resilience when faced with drought and periods of low water availability

- understand the whole cost for consumers as access to water can affect energy and food costs, especially as the need for our urban environments to overcome the heat island effect through greening and shading can assist in adapting to extreme climate conditions, providing health and economic benefits.

- further articulate its role in providing public good and environmental obligations in catchments, in urban environments and wastewater reuse and disposal, such as sea grass loss from stormwater run-off, impact on creeks and rivers etc.



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- partnering with communities and government to explore options, understand the impact of climate trends and to agree and deliver these environmental projects

- to mitigate its impacts on climate change, and as such we applaud the net zero energy initiative. We note though, that the initiative lacks consideration of other energy users, the movement of costs to other consumers and the possibilities for affecting energy security in regions.

South Australia's future is entangled with the fortunes of SA Water. As such we submit that the organisation will need to recognise the benefits of working with consumers to explore and agree better water outcomes as we face challenges together. This effort requires a culture change within the organisation and a commitment beyond the regulatory process. We look forward to working with SA Water to improve water supply, use and disposal for the long term benefit of South Australians.

Yours sincerely

Craig Wilkins Chief Executive