

# Broken Hill Darling River Action Group Inc

Submitted by Tom Kennedy

Thank you for the opportunity to submit to the IPART determination for Broken Hill water supply by Essential Water.

I am the Public Officer of the Darling River Action Group Inc who have 800 members I am also a councillor with the Broken Hill City Council, though I am not speaking on behalf of the council I do have an understanding of council operations and I am familiar with council's submission. I also speak to many people and have been told the affect increases will have on their ability to pay.

This is the third consecutive time I have submitted an objection to the proposed price increases from Essential Water for the effecient operation of Broken Hill's water supply.

On the first occasion 2010 Country water as then known asked for a 45% increase over 3 years this was not accepted by IPART and they allowed a significant less increase as those in charge of IPART determined that effecencies could be achieved.

The subsequent 2013 IPART determination Essential Water asked for 24% increase over 4 years this was rejected by IPART because essential water had not implemented the effecencies that were set out in 2010 and allowed CPI increase for that period.

The current requested increase of 28% by essential water is a combination of what they asked for in 2010, 2013 and did not get. Essential water has failed to implement the effecencies that IPART have suggested or they would not be still after thye same increases.

1.3.3 of the report Essential Energy has a lowering operating expense of \$1.6m and is attributed to not using the Menindee Pipeline. The savings in operating costs are significantly lower than they should be. From the discussion I had with former General Manager [REDACTED] who stated that with a pipeline directly to the water plant this would allow for significant operational savings such as decommissioning Imperial Lake and potentially Umerumeke Reservoir and a reduction in maintenance at Stephens Creek Reservoir. I asked have these been included and if so the effecencies gained have not been met as \$1.6m operational saving from these measures are extremely low.

1.3.6 It is acknowledged that Broken Hill is not the only area to benefit from the pipeline and that IPART will determine how much Broken Hill should pay and how much the NSW government should pay for the benefit of those above Menindee Lakes. I would argue that Broken Hill should not pay any increase as a result of the pipeline. It was acknowledged by the NSW Irrigators Council that it was a win for them and the Inquiry into NSW water management recommended that Broken Hill's water supply charges not increase because of the pipeline. Also Broken Hill's water supply had never been an issue until the mismanagement of the Menindee Lakes and upper Darling River.

3.5 IPART are looking at the affect increases will have and how it relates to average incomes. Broken Hill has 2 significantly different earning levels we have high income earners from the mines and very low income earners, we have a very high number of welfare depended residents. This greatly affects the ability of the community to pay. There are already about 10% of customers on payment plans and any increase above inflation will cause many more to struggle. An increase above inflation could cause a dramatic drop in population which will further cause a reduction in income for Essential water and eventually another increase for those that remain.

With increases in water charges it will have the effect of less consumption this will cause a number of detrimental outcomes. This has happened a number of times already. We now have no grass on verges, there are ovals that are now dirt rather than grass, grass in yards have been replaced by pavers etc, city roundabouts have been replaced by pavers and gardens have been reduced. Broken Hill went from a maximum summer daily usage of 33ML per day in 2000 down to a low 18.7ML in 2011 and the Broken Hill pipeline delivers 37ML per day. This major reduction in usage has caused not caused a reduction in cost in fact it has had the opposite affect, a significant increase in costs, well above inflation over this period.

Additional increase above inflation will have the affect of the city being exposed to more bare soil as people attempt to reduce water costs by removing the remaining gardens, lawns etc. We will likely lose more ovals as schools cut costs and potentially even the Broken Hill City Council will reduce watering and ovals as they try to balance operational costs.

This will increases the risk of lead exposure.

An extract from an article in the BDT Lead issue still weighing on city

Monday, 30th September, 2013

By Andrew Robertson

“Even though the average blood lead is low, for those children living close to isolated points of exposure, the risk of high blood lead would - all other things being equal - be higher.” Mr Phillips said ongoing monitoring was important as Broken Hill had high concentrations of highly bioavailable lead in soil and dust after tens of thousands of years of erosion of the exposed ore body, and 100 plus year of human activity.

Lead levels in Broken Hill have risen for the first time in many years as written in the BDT article in October 2013. Article can be viewed from the BDT.

There have been numerous articles written since this about the concerns of lead levels in children living in Broken Hill. Safe blood levels are now at 5 micrograms per dl instead of 10 which makes keeping lead contaminated soil covered even more important.

It has becoming increasingly evident that the increases from the 2010 IPART review have

caused significantly less greening of the city and increased exposure to lead contaminated soil. I am thankful that IPART did not increase water charges above inflation at the 2013 determination as things would be even worse.

The vast majority of Broken Hill's soil is well above the NSW safety guidelines 300ppm, with some areas as high as 10,000 ppm. This information can be accessed from the Broken Hill City Council.

The NSW EPA soil action level for further investigation is 300 ppm (parts per million)The following are the USA EPA guidelines for lead contaminated soil:

BARE SOIL CONCENTRATION FOR SOIL AREA EXPECTED TO BE USED BY CHILDREN\* FOR SOIL AREA WHERE CONTACT BY CHILDREN IS LESS LIKELY OR INFREQUENT

up to 400ppm (parts per million) OK\*\* (note NSW EPA action level for further investigation is 300ppm) OK 400 - 2000ppm response action 1 OK 2000 - 5000ppm response action 1 response action 1 above 5000ppm response action 2 response action 2

#### RECOMMENDED RESPONSE ACTION 1

Interim controls to change use patterns and establish barriers between children

and contaminated soil including:

- \* planting groundcover
- \* moving play equipment
- \* restricting access through barriers
- \* controlling further contamination of the area

As can be seen by the above one of the most important and easy lead control measures is the planting of ground cover and given Broken Hill's circumstances is the only practical effective measure.

Rain in Broken Hill cannot keep lawns or gardens alive it requires regular watering well above other areas. Cost of water has a significant affect on the greening of Broken Hill.

I will attached a number of photos of ovals that show the affect that water increases have had and the ability to maintain ovals at an acceptable level.

Yours Sincerely

Tom Kennedy

