

29.11.22



Dear Commissioner,

LAWROC RESPONSE TO BARWON WATER'S PRICING SUBMISSION TO ESSENTIAL SERVICES COMMISSION – DECOMMISSIONING THE BARWON DOWNS BOREFIELD

Whilst we have congratulated Barwon Water on their 2020-21 Annual Report and Urban Water Strategy for beginning the process towards decommissioning the Barwon Downs borefield, we are concerned about the decommissioning timing.

The Barwon Water Price Review 2023 to the Essential Services Commission indicates that funds are sought for borefield decommissioning in financial year 2027. We submit that this is too late in the 5-year funding period, leaving open the possibility of a renewed licence application. Although every indication of Barwon Water's intended direction suggests this is unlikely – and the borefield is deteriorating – a climate-severe summer, a change of management or government, may re-open this traditional option for consideration if insufficient progress has been made on alternative sources of supply as detailed in the UWS.

The environmental impacts of the deteriorating borefield are of concern. It is clear that decommissioning must include stabilising the impacted area to prevent further aquifer structural harms and environmental damage. **Otways waterways have already been severely damaged due to the now-acknowledged long-standing over-extraction regime.** Given that the bores are screened in each of the three known aquifers and pumps have been removed, the hydrological situation indicates that bores must be completely removed and rehabilitated to ensure that they are not cross-contaminating the aquifers in this area. This clearly needs to happen swiftly.

The Otways community has waited long for - and worked hard to enable - serious action to prevent further mis-management of Otways waterways. However, stopping the extraction regime is only part of the restoration required; the borefield now needs urgent rehabilitation, not to be left for *another* 4-5 years to deteriorate further.

For the above reasons we strongly submit that decommissioning the Barwon Downs borefield must begin in the next financial year 2023/24.

Thank you for your consideration of these serious concerns.

Your sincerely,

Dr. Marina Lewis,
Land and Water Resources Otway Catchment (LAWROC) Executive Member