

## SUBMISSION TO THE

### *SA Water Regulatory Determination 2024*

4 October 2023

#### Submission prepared by:

Jodi Slater  
Policy Manger

Kaurna Country  
Level 1, 85 Hutt Street  
Adelaide SA 5000

E [cotasa@cotasa.org.au](mailto:cotasa@cotasa.org.au)

P 08 8232 0422 1800 182 324 (Country callers)

[www.cotasa.org.au](http://www.cotasa.org.au)

COTA SA welcomes the opportunity to provide a submission to *SA Water's Regulatory Determination 2024*.

COTA SA is an older people's movement run by, for and with older people. We represent the rights, interests and futures of around 700,000 (39%) older South Australians. We engage widely with older South Australians across the state, in person, via phone and email. The lived experiences of the diverse community of older South Australians shape our policy and advocacy work.

Throughout SA Water's planning process, COTA SA has been a member of SA Water's Peak Bodies Engagement Forum (PBEF) and, where possible, we have provided insight and information through these forums to ensure the needs and preferences of older South Australians have been considered.

Upon reviewing SA Water's Regulatory Business Plan 2024-28, we raise the following points for ESCOSA's consideration.

## Issues

### Community Engagement

There are significant barriers both for individual people and for organisations such as COTA SA to participate in regulatory determination processes. The community engagement program for water services in South Australia should maximise consumer participation and engagement so that consumers are fully informed and adequately represented in decision making.

COTA SA acknowledges the efforts of SA Water to engage with the community to inform its plan. We trust that the diversity of older people has been adequately represented in the data used to inform SA Water's plan. We encourage ESCOSA to scrutinise this data to ensure SA Water's research and engagement approach is robust and the proposals reflect what is in the best interests of the South Australian community, as expressed by them.

### Cost of living

Cost of living pressures are very real and very difficult for older South Australians, particularly for those on low and fixed incomes, and renters, whose only option to balance a budget is to cut spending- and often on things like food, healthcare and staying in touch with family and friends. The increasing price of essential services is of great concern to older people. We welcome efforts by SA Water and the State Government to keep water bills low over the next regulatory period, through the reduction of SA Water's operating expenditure. In the current environment where cost of living is felt by many across the community, COTA SA is supportive of the decision to prioritise affordability.

### Prioritising investments under Ministerial direction

We note that considerable expenditure proposed in the next regulatory period is because of section 6 Ministerial Directions. COTA SA is concerned that the increased use of Ministerial directions compromises the integrity of the regulatory process because they will not be assessed with equal rigour and scrutiny as the rest of SA Water's plan. There is an incredible amount of emphasis on SA Water's community and stakeholder engagement processes, notably a 'willingness to pay' study. It is our understanding that Ministerial directions do not undergo the same level of engagement. That is, SA Water customers do not have the opportunity to provide feedback on the prioritisation of other investments in relation to these directions. Further, some potential investments that would positively impact the community, such as investments around equitable and accessible services, are sidelined. There must be a mechanism in place to ensure that Ministerial directions are scrutinized in ESCOSA's determination process.

## Regional water quality

During this planning period, COTA SA received a grant through the Department of Environment and Water's Consumer Advocacy Research Fund to explore the needs, behaviour, and attitudes of older South Australians in regional areas as it relates to water<sup>1</sup>.

Our research found that an older person's ability to manage their own water supply, access and usage is key to maintaining their physical and mental health and independence as they age, contributing to their ability to 'age in place', which is desired by many. Where a person lives can significantly increase the challenges they may face in relation to water. In regional areas where water quality is poor, older people experience daily challenges in relation to water, which includes issues with accessing quality water for drinking, bathing, and other daily uses, and experiencing damaged household infrastructure because of using towns water in their homes. Furthermore, this population demonstrate low levels of literacy surrounding their consumer rights and protections, which suggests a need for SA Water to improve communications and education about this topic to ensure their customers know what their rights and protections are.

More than 26% of people aged 50 years and over live in regional South Australia. As our population ages, this proportion is predicted to rise. Regional communities benefit greatly from older residents who contribute to their communities in a number of ways. They are business owners, carers, workers, customers and volunteers. COTA SA has long advocated for a whole of government approach to address the real and significant challenges that our regional communities face, including housing shortages, workforce gaps and inadequate health and care services. In some regional areas, the quality and supply of water is another challenge that must be addressed.

We note that, despite SA Water's efforts to develop a long-term regional water quality improvement plan and testing investment options in its willingness to pay study, there are no investments in its regulatory submission to address poor water quality in regional areas. Whilst we understand the cost impact of investing in regional water quality must be carefully weighed against short and long-term affordability, we support further analysis into this decision given the economic benefits of such investment, particularly as it relates to ageing well and delivering on *South Australia's Plan for Ageing Well 2020-2025*.

## Acknowledgement of Country

*COTA SA acknowledges and respects Aboriginal people as the traditional custodians of the land of South Australia. We honour Aboriginal peoples' continuing connection to Country and recognise that their sovereignty was never ceded. We pay our respects to First Nations Elders past, present and emerging and extend that respect to all Aboriginal people.*

---

<sup>1</sup> [COTA-Understanding-Water-Use-and-Needs-of-Older-People-in.pdf \(environment.sa.gov.au\)](#)