



9 July 2021

Mr Richard Priman
Director, Urban Water Supply Planning
Department of Regional Development, Manufacturing and Water
PO Box 15216
City East QLD 4002

By email: urbanwatersupply@rdmw.qld.gov.au

Dear Mr Priman,

Proposed amendment to Water Regulation 2016: Increasing the expected duration of water restrictions in South East Queensland

We refer to the above amendments. QCOSS recognises the importance of water restrictions in managing water supply for specific purposes and we thank you for the opportunity to provide feedback.

Queensland Council of Social Service (QCOSS) is the peak body for the social service sector in Queensland. Our vision is to achieve equality, opportunity and wellbeing for every person, in every community. QCOSS has been working in water policy related to consumer issues for over seven years. As part of this work, we regularly convene an Essential Services Consultative Network, made up of organisations representing consumer interests; QCOSS work is guided by the views of this network.

We are pleased the Department of Regional Development, Manufacturing and Water's Information Paper acknowledges that the success of water restrictions is dependent on community support. With the potential for water restriction measures to be in place for longer periods of time in the future, it is critical that all households and water users are supported to be sufficiently informed so they can actively participate and comply.

We have identified several issues that may prevent tenants from complying with water restriction measures. These are as follows:

- Tenants do not receive any information from their water service provider to help them understand their water usage and inform behaviour change. Previously, water service providers issued Water Advice Notices to provide water consumption information and household comparisons to property occupants. However, this requirement was repealed by the Water Supply Services Legislation Amendment Bill 2014.
- Tenants cannot contact the water service provider to get information about their water usage. Water service providers will only disclose information about water consumption in a property to their "customer", which is the property owner.
- Property owners who charge their tenants for water are not required to provide tenants with a copy of the bill or any other itemised information about the volume of water used at the property. This prevents tenants from understanding their water

usage and inhibits their capacity to adjust their behaviour to comply with water restriction measures.

- There are no set timeframes that landlords must adhere to when passing water charges onto tenants. Therefore, property owners can pass a backlog of multiple water bills onto their tenant at once, all of which are required to be paid within one month. This means tenants can go months or years with no invoices that give them an indication of how much water they are using. It also has negative impacts on tenants' ability to budget and manage the cost of water over time. This is made more difficult given tenants are excluded from accessing some hardship support or concessions, including the Queensland Government's Water Subsidy.
- Property owners can only pass the cost of water onto tenants if the property is water efficient. It is difficult for tenants to determine if their property meets these requirements as landlords are not required to have the property certified as water efficient and are not required to provide proof of this to the tenant.
- The water efficiency advice and education provided by water service providers and SEQWater does not target tenants.

Recent polling of community services and property managers indicates that a majority of tenants in South East Queensland are being charged for water by their landlord or property agent.¹ If tenants are required to comply with water restrictions it is essential that they have access to relevant information, education and support to help them manage their water consumption.

The *Housing Legislation Amendment Bill 2021* ('the Bill') is currently being considered by the Community Support and Service Committee. The Bill proposes amendments to the *Residential Tenancies and Rooming Accommodation Act 2008*. We note that this Bill does not include amendments to require property owners to pass itemised water bills onto tenants within a reasonable timeframe. There is an opportunity to amend the Bill to ensure water usage information is provided to tenants in a timely manner, which would improve tenants' capacity to respond effectively to water restriction measures in the future.

Thank you again for the opportunity to provide our feedback.

Yours sincerely,



Aimee McVeigh
Chief Executive Officer

¹ This estimation is based on a poll of participants from two QCOSS webinars on water charging for tenants and landlords held on 18 May 2021. We asked participants "In your experience, what proportion of tenants are being charged for water?" A mix of 47 community service workers and property agents from across Queensland responded. Responses varied from 10-100%, with an average response of between 60-70%.