

Lake Eildon Boat Owners Group

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The Hon Lisa Neville MP
Minister for Water
Level 17
8 Nicholson Street
East Melbourne Vic 3002

5 September 2016.

Dear Minister Neville

RE: Lake Eildon Houseboat Regulations & Grey Water Treatment Systems

Our Group represent and speak for over 600 of the houseboat owners on Lake Eildon and we correspond with you to request the Regulations cited above be suspended until they are reviewed.

Very little information was available to boat owners as to the impact these Regulations would have on boat owners as well as other affected stakeholders prior to their implementation.

These Regulations were put in place during the course of the last Government and are unworkable in practice. To this end the DELWP are employing a Consultant to recommend the improvements and amendments required.

The Regulations as they stand now and coming into the tourist season for Eildon will result in considerable hardship for not only houseboat owners, businesses that rely on tourism associated with houseboats as well as tourist enterprises in Eildon and surrounding areas. This has an impact on employment.

The Regulations are unworkable and we list below some of the reasons we are requesting you to suspend the current Regulations.

- All houseboats are required to be fitted out with a Grey Water Treatment System [GWTS] by 2020. This target is impossible to achieve.
- The cost to have a boat fitted out with a GWTS is anything from \$18,000 when fitted into a boat being built to over \$40,000 when retrofitting to a smaller boat which may only be valued at around that price if they were to sell their houseboat. It is simply not possible to fit a GWTS to some of the houseboats on the lake.
- The GWTS approved are not fit for purpose.
- The sale of boats has been radically reduced due to the Regulations. Many of the boats being sold are being sold illegally as they are not fitted with the GWTS.

- Many systems already fitted to boats have been turned off due to being unworkable, system breakdowns and the unacceptable smell they emit.

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To date houseboat owners have had numerous discussions with Goulburn-Murray staff as well as with Ministerial advisors and senior staff of your Department. Unfortunately we are now no closer to reaching a workable and satisfactory agreement than we were when we first raised these issues more than two and a half years ago. These have included a workshop attended by all interested and concerned stakeholders, and more recently the decision to appoint a Consultant to review the matter.

The Regulatory Impact Statement criticised the Regulations stating that those responsible for developing the Regulations had not consulted adequately with boat owners; had not considered other options that might have addressed the issues of treating grey water; that the cost benefit analysis did not justify the installation of the recommended grey water treatment systems identified as well as a number of other issues that should have been considered and addressed.

The Victorian Competition and Efficiency Commission on April 11 2013 wrote giving advice on the Regulatory Impact Statement stating that the RIS does not meet the requirements of Section 10 of the Act.

Additionally research undertaken has revealed that a large number of existing houseboats cannot be retrofitted with the treatment systems recommended due to lack of available space, inadequate power and or the extra weight of these plants.

As a consequence we respectfully request that the Regulations be suspended until the issues raised can be addressed and a mutually acceptable solution be achieved.

Due to the significant passage of time that has taken place since these issues were initially raised we request that an answer to this correspondence to have the Regulations suspended be provided to us within 14 working days.

Yours sincerely
John Horton

cc: Andrew Fennessy. Andrew.Fennessy@delwp.vic.gov.au