



Peppercorn Ridge  
Bombala Rd  
CANDELO 2550  
5 November 2001

Thomas G Parry  
Chairman  
Independent Pricing and Regulatory Tribunal (IPART)  
PO Box Q290  
QVB Post Office  
SYDNEY NSW 1230

Dear Mr Parry

I am writing about the Draft Report on Bulk Water Prices to be charged by DLWC from 1 October 2001 for access to and use of the water in the unregulated stream flowing (generally) through my property.

I am not going to waste much of my time as I doubt that any notice will be taken of what I say anyway but it will be on the official record for future reference.

From the outset I must say that I am disappointed with the report in that I expected to be able to determine just what DLWC will actually do with the ever increasing charges I am expected to find. I have little concept of what DLWC does with my funds. Could you tell me or provide some material of what DLWC does with my funds? You say that only efficient costs have been allowed. I want to know the basis of all costs to see if only those costs involved with servicing irrigators directly are included.

I note the South Coast unregulated rivers have a huge deficit in the concept of full cost recovery. Could you explain why this should be so as DLWC does virtually nothing to service users on streams such as mine?

You must be concerned with the pathetic response to your call for submissions. Only 46 submissions from organisations where the author was invariably being paid to do the work and a mere 11 from individuals where they would be not paid for their time or resources. When one considers the many thousands of organisations and individuals who will be effected by your decision your public consultation has been miserable.

Again I say that experience has conditioned people to not waste their time as they know DLWC will get their way however dubious their submission.

The report indicates that you have limited knowledge of how most users on unregulated streams operate. I would be typical of thousands in that when we get average rainfall we never irrigate. When we have a dry spell and want to maintain pasture there is little or no water available for use because it has not rained. I suppose you have read the book Catch 22. On page 67 you note that the Water Management Act 2000 will dramatically alter my access to water during dry times just when I require some water. Could you explain where in the draft you have catered for the fact

that I will be prevented from drawing water because the environment has first and total call on water. Will all my payments for water be suspended for the period I am denied water from my creek? Surely if the environment takes all the water then it is reasonable for the environment to pay for it and all associated costs to satisfy this user pays philosophy.

Your acquiescence to DLWC in granting some \$42M, about half the budget, for water resource management is not justified by anything in the report. This money should be totally found by the State as the activity is now totally for the community with the environment the priority for all decisions.. I note the wonderful coincidence that the consultant and DLWC happened to submit exactly the same figure of \$42M to the Tribunal for water resource management. Could you please confirm that there was no collusion between these parties in submitting the same figure?

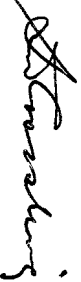
Your comment at paragraph 7 of the news release about the lower price for unregulated water as compared to regulated water shows just how little work you have done to understand the situation. Regulated water should be 10 or 20 times as expensive as unregulated water. In normal seasons the water flowing in my creek simply flows to waste in the ocean. When it is dry I would gladly pay a much higher price just to have some water instead of NONE! Within the report various levels of water security are discussed but you completely overlook the NO security status for some and make no provision for those people. I call on you to address this issue before you release the final report and request that this review be done also taking into account the new Water Management Act 2000. I demand that an additional category of NO security be included in the tables with an appropriate fee structure!

I can find no reference in the draft report to the fact that the increased user charges are additional to the licence fee paid to DLWC. I have just paid \$213 for what. How much money is gained by DLWC from these fees and why are they not applied as an irrigator contribution to DLWC running expenses. Can you tell me how much money is raised from licence fees? Can you tell me where this money goes and what it is spent on? Have you looked at the need for such fees and the efficiency with which the fees are raised and if not, why not? I do not register my car each year only the have to pay a separate fee each five years for the privilege of registering my car each year. Surely it would be more efficient to simply include the licence fee into the user charge each year.

If you refer to the consultants reports in your reply then I would expect you to include a full copy of that report to be sent to me. My experience with consultants reports is that they can provide you with exactly what you want and of course leave some areas a bit grey with a recommendation that some more work (at an appropriate rate) would certainly be in order.

I look forward to your reply and the final report.

Yours sincerely



Stephen Crossling