

# Mungindi - Menindee

## Advisory Council Inc.

A Council to advise on the **Barwon-Darling** River and other controlled rivers from which limited volumes of water may be extracted under license **conditions** when flows occur following rain in the catchment.

**President:**

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16 May 2001

Kumar Rasiah  
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Dear Mr Rasiah

I refer to the DLWC Submission to **IPART** Bulk Water Pricing for **2001/02** - 2003104 which was handed to our former President, Barry Strahan, when he attended the meeting arranged by Customer Service Committee representatives in Sydney on 9 April 2001, and the need for a **response from** this organisation by 11 May 2001.

A meeting of this Council was held at Bourke on 9 May 2001 when the matter was discussed and considered. The issue of the Council assuming some of **the** responsibilities of a Customer Service Committee to represent the **Barwon-Darling** River was also discussed following proposals put forward by Donna Ambler of your staff.

The Council has requested an extension of time for the lodging of a response until 18 May 2001 which was verbally approved.

The following comments are virtually unaltered **from this** Council's last response as it appears that State Water has ignored what has been stated in the **past**.

As indicated **in** this Council's previous two submissions to **IPART** in respect of costs of water and services, which DLWC says should be apportioned to water users, there still appears to be a complete misunderstanding of where the responsibility for raising these funds lies.

**There** are no control structures on the Barwon-Darling River between Mungindi and Menindee other than a number of **fixed** crest weirs, which cannot be operated to regulate flows,

While there may be some advantage for town water supplies from the weir storages, the conditions that relate to the extraction of water prevent irrigators **from** making any use of the stored water.

This section of river relies entirely on "event" flows and is dependent on any excess water that reaches this section **from tributary** streams in N S W and Queensland.

Irrigators have to provide their own storages and **infrastructure** to have any security of supply, and this has been denigrated by the introduction of measures to satisfy the **MDBC** Cap requirements.

The DLWC still appears to consider that the main purpose of this section of the **Barwon-Darling** River is to provide water for environmental purposes and to act **as** a conduit to pass water **from** the upper **catchment** through to **Menindee** Lakes and ultimately to South Australia, with all the priorities directed to this aim.

**In** the Detailed Sub-Product Expenditure Report for the year ended **30<sup>th</sup>** June, 2000, the customer share percentage shown is in most cases completely unacceptable and details and reasons for this opinion are listed hereunder,

***PA1 00; Quantity data collection and archiving***

***PA1 10; Resource access quality/standards***

***PA120; Annual river operations planning***

***PA130; Quality data management.***

This Council's position regarding these items remains unchanged **from** last year.

The collection of data and **the** management of data concerning water quantity provides information used by the general public, Commonwealth and other State Governments, and in the case of **Barwon-Darling** irrigators this information is mainly used to limit the way in which water is shared. As the present government policy gives priority to environmental flows, the majority of any charges for **this** service should be borne by the government.

*20% Customer Share.*

***PB1 00; Resource access interstate policy.***

No part of this product should be charged to irrigators.

*0% Customer Share.*

***PB110; Resource access state policy/standards.***

The policy determinations relating to access to resources **affect all** residents in an area, not just those who are licensed to extract **water** and no more than 20% of this product should apply to water users.

*20% Customer Share.*

***PB120; Unregulated allocation plans.***

The **Barwon-Darling** has a Volumetric limit on extraction" fixed by license conditions already determined and any charge for this product should only apply to the unregulated streams other than the **Barwon-Darling** when the government completes its implementation of regulation of **all** unregulated streams.

*0% Customer Share.*

***PB230; Surface water license surveillance.***

The only surveillance on the use of licensed water on the Barwon-Darling is **carried** out as part of the metering **function** and this is covered by **PC230**.

*0% Customer Share.*

***PC1 00; State river operations policy and plans.******PC1 02; Customer and industry liaison.***

The State Water arm of DLWC has control of the management and sale of water to users and any such charges should be deducted **from** this income and not applied as a separate charge.

*0% Customer Share.*

***PC210; Unregulated river operations.***

There are no control structures on the unregulated sections of rivers on the **Barwon-Darling** and any flows **which** enter or pass **through** the river **are** not managed other **than** by conditions attached to licenses. Any regulation of flows 'by imposing bans on pumping for environmental reasons are for **the** benefit of the population in general and therefore should be a charge borne by ratepayers generally.

*0% Customer Share.*

***PC402; Asset management plans, standards and audit.***

The only assets State Water has to manage on **this** section of river are the fixed crest weirs, which do not benefit water users generally.

*0% Customer Share.*

***PC408; Public liability and other infrastructure insurance.***

To levy this charge against water users is really seeking to have water users pay for an insurance policy which would protect the DLWC, not the users.

*0% Customer Share.*

***PC413; Maintenance of land and buildings.***

Unless this item can be better defined it is not possible to relate to any land or buildings which affect unregulated irrigators.

*0% Customer Share.*

***PC41 7; River structure maintenance******PC423; Reg., rereg., other structure surveillance data collection.***

**Any structures** such as weirs on the **Barwon-Darling** are for the benefit of the general public, not the irrigators on **the** unregulated section. Any costs should be met **from** general government funding.

*0% Customer Share.*

***PD200; Blue-green algae strategy,******PD210; Nutrient control plans.******PD230; Blue-green algae education and awareness.***

All of these issues affect all occupiers and visitors to the western area and as irrigators and water users are prevented by license conditions **from** returning any water or nutrients to the river, and **in** fact may be prosecuted if this happened, it is quite unreasonable to expect irrigators to contribute to **this** cost.

*0% Customer Share.*

No attempt has been made to dissect the costs listed, but it appears that the only appropriate course of action is to comment on the way in which the responsibility for sharing of costs is made rather than to remark on the apparent addition of "on costs" which are applied to maintain **the** overall operation of the DLWC.

Until such time as **all** pumps are metered along the Barwon-Darling, there should be no change to **the** present system which allows users to have the option to either be charged for water used, or according to the area **authorised** to be irrigated as has been the case to date. Present licenses do not have an allocation of water, but are **limited** by conditions which specify an upper limit of extraction. This is not an entitlement as such and **therefore** cannot be used as the basis for a minimum annual charge **in** the same way as that which applies to regulated streams.

As indicated between Table 5.2 and Table 5.3 on page 30, there should be no introduction of a two-part tariff until metering and monitoring is fully implemented **in** each valley. **In** the case of the Barwon-Darling, the "Entitlement Charge" should continue to be based on **area and** not **megalitre** entitlement until such time as an allocation and not an upper limit of extraction figure is attached to **Barwon-Darling** licenses.

If the "**megalitre**" entitlement figure were adopted, the charge for a 162 ha license in the **Bourke area** would rise from **the** current charge of \$889.38 per annum to \$4276.80 per annum - an increase of some 480%.

**This** does not comply with the **IPART** directive that charges should not increase by more than 20% per **annum**.

Any increase in water **charges** should certainly not exceed **20%**, as indicated by **IPART in** its last determination and this underhand attempt to raise basic charges for water to an unacceptable level on any unreliable unregulated river is not acceptable to this Council.

Yours faithfully

Peter Cottle  
President,  
**Mungindi-Menindee** Advisory Council.

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