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**11<sup>th</sup> June 2010**

**Independent Pricing and Regulatory Tribunal**  
**Queen Victoria Building**  
**NSW 1230**

**Dear Tribunal,**

**SUBMISSION TO IPART REGARDING NEW SOUTH WALES OFFICE OF WATER PROPOSED BULK WATER PRICING FOR THE PEEL UNREGULATED RIVERS AND THE PEEL ALLUVIUM ( ground water).**

As members of the Cockburn Valley Water Users and Land Care Association Inc, we strongly object to these outlandish proposed increases in bulk water charges. New South Wales Office of Water ( N O W ) indicate a wish to move to 100% cost recovery.

We question the transparency of what N O W regard as full cost recovery. We also remind IPART many government service costs are distributed across the entire population, eg: public transport.

N O W offer no security of supply to unregulated general security users, and no security of supply to ground water users.

Apart from monitoring bores and river height gauges N O W have no infrastructure requiring maintenance or replacement in the Peel system.

Costs associated with monitoring bores and river height gauges must be drawn from general revenue as these structures are in place as a compliance tool, to restrict and monitor the irrigation industry.

Any charge increase above the consumer price index must be denied by IPART as no extra services are provided by N O W.

**N O W must operate within a budget that is affordable to their customers.**

As customers of N O W the unregulated general security users of the Peel system, and the ground water users of the Peel system cannot afford any increase above the CPI.

Cease to pump ( CTP ) levels have been triggered many times in recent years, resulting in total crop failures. This trend is likely to continue, as CTP levels in many creeks and streams exclude irrigation at vital periods of crop growth.

The Peel Water Sharing Plan ( WSP ) will be operational from July 1<sup>st</sup> 2010.

Access to ground water for irrigation will be further restricted due to the linking of ground water extraction and unregulated surface water CTP rules under the plan.

The peel WSP also significantly restricts the total amount of usage in the ground water to approximately 15% of total entitlements held.

In general, irrigation farmers have suffered a lot of punishment from many quarters in recent times. Our ability to pay any more for our irrigation water we often don't

receive is exhausted.

**N O W must reduce their wish list to reflect the difficult financial period their customers are experiencing.**

Metering charges are another form of revenue raising that must not be introduced. In the Peel irrigation area, irrigation properties are generally small with many having multiple pumps and are regarded as small volume users. Metering charges would be another charge that is not affordable. A more sensible system would be to use telemetry or quarterly reading by the user.

We appeal to IPART to reject the proposed bulk water charges by the monopoly provider N O W.

Ian Coxhead

For Cockburn Valley Water Users and Land Care Association Inc