

June 30, 2005

Dr Michael Keating
Chairman
Independent Pricing and Regulatory Tribunal
PO Box Q290 QVB
POST OFFICE NSW 1230

Dear Dr Keating,

I enclose some comments on the recent IPART paper on water and waste water pricing/conservation in Sydney.

I apologise for not linking my comments to the issues/paragraphs, but I was unable to download the issues paper for some reason probably due to my computer.

Thank you for the opportunity to comment on these matters.

Yours sincerely

Sally A Hodgkinson

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Submission to Independent Pricing & Regulatory Tribunal

1. One of the major problems I consider relative to water conservation/water pricing in Sydney is the lack of individual water meters in strata unit blocks. Freestanding houses each have their own meter but unit blocks do not having only a single meter for the whole block. The advice I have received is that new such structures do not require separate water meters to be fitted. Almost the entire cost of water used by the unit block is borne by the relevant corporate body.
2. As a consequence there is no incentive for the occupants whether owners or tenants of the unit block to conserve water. Most strata unit blocks, especially those built in recent years have a dishwasher as standard and provision for an automatic washing machine.
3. Retrofitting of every unit block in Sydney by the Water Board so that every unit had its own water meter would be prohibitively expensive, and probably physically impossible. In addition the individual corporate bodies should not be saddled with the cost of retrofitting since the planning regime under which strata units were/are constructed did/do not require such to be fitted.
4. The new BASIX rules for new structures that will require fitting of water conserving shower heads etc to be fitted still do not I understand, require strata unit blocks to be fitted with an individual water meter. This should be a requirement for any new unit block approved for construction in 2006.
5. My concern about water conservation arises from living in the country where rain water was the only water supply. As a consequence even though I live in a unit as an owner, I am conscientious in conserving water – only using my dishwasher when I have had guests, catching the run off water from the shower in a bucket for use on either my pot plants or to flush the toilet. I also have a bucket in the sink for the same purpose.
6. I note that the Environmental Planning and Assessment Act apparently specifically excludes structures under the Strata Act from the BASIX regulations. In addition nowhere does it mention a requirement that strata unit buildings should be fitted with individual water meters. Such units are fitted with individual electricity meters, surely it should not be beyond the wit of developers, planners, builders and Councils to require the inclusion of individual water meters.
7. Large water users should be charged accordingly, but without individual metering there is no ability to identify the large users in strata units. It is patently inequitable to charge the entire unit block excess when the cause may be just one or more units in the block using excess water, while the others actively practise water conservation.
8. Requiring family groups to have a Commonwealth Health Care card may in fact disadvantage large families who do not have health care card. I recognise that this is a simple device to use to determine eligibility. However perhaps IPART should undertake consultation with relevant interest groups to identify a better method of separating out/identifying such user groups. It should also consider an appeal mechanism.
9. The issue of storm water reuse/recycling is a subject in its own right. If Sydney is to overcome its water problems in a globally affected environment it will need to address the issue of storm water use and water recycling quickly. Consideration should be given to a public/private partnership in developing recycling proposals, especially in new suburbs, but could even be considered for established suburbs. Just saying 'no' to any such idea smacks of an ostrich attitude. Australia has some of the best and brightest scientists and infrastructure experts who could come up with both profitable and effective water reuse/recycling schemes that would reduce the use of 'fresh' water and hence minimize Sydney's water needs longer term.
10. Consideration should be given to removing all recycling/reuse waste water issues from the Sydney Water Board responsibilities and allowing the aforementioned public/private partnership to resolve this problem/issue. Sydney Water could still supply fresh water.

Sally A Hodgkinson