



Our Australian Rice Industry

Growing Rice to Feed the World



17th November 2004

Mr J Cox
Acting Chairman
IPART
PO Box Q290
QVB Post Office NSW 1230

Dear Mr Cox

Review of the Operating Licence for State Water Corporation

The Ricegrowers' Association of Australia Inc (RGA) would like to thank the IPART for the opportunity to comment on the above review.

The following issues are those that the RGA sees as relevant to the Initial Operating Licence for State Water, including and not limited to: -

- ~ State Water's business must be efficient and commercial and the Initial Licence should reflect the nature of the business and its area of operations;
- ~ There are significant legislative and regulatory regimes with which State Water must comply but these must not be allowed to become so complex and unnecessary as to inhibit the ability to deliver a cost effective service to its customers;
- ~ State Water must not be burdened with unnecessary regulatory environments or outcomes sought by other agencies which are unrelated to the business's operations, should not be required to deliver unfunded community service obligations (CSO's), nor used as a vehicle to implement other agencies etc reforms or regulations which do not relate to the business of State Water;
- ~ There remains a need to further clarify the relationships between State Water and other agencies such as DIPNR, DEC, DPI, Dam Safety Committee's, CMAs etc;
- ~ State Water must focus on the core business of water delivery operations, best management practice, leadership and benchmarking against similar businesses;
- ~ Performance measures must be objective, measurable and relevant to the core business of State Water; and
- ~ Support for the continuation of the CSC's but little support for the proposed CCC as any state wide consultation would be better handled via the NRAC.

The RGA notes the State Water submission and supports the issues raised by State Water, including and not limited to: -

- ~ The Water Management Act 2000 (NSW) does not address the separation of the regulatory and operational roles of DIPNR and State Water, including empowerment of State Water of the functions it requires to operate as a commercial business;
- ~ There is no customer contract between State Water and its customer;

RICEGROWERS' ASSOCIATION OF AUSTRALIA INC

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A Commodity Council of the National Farmers Federation

- ~ The independent review of regulatory and operation performance by an independent agency, eg Natural Resources Commission (NRC);
- ~ A regulatory framework that is comprehensive without duplication, efficient, realistic, measurable without being excessively onerous – RGA endorses the performance standards in Appendix 3 of State Water’s submission; and
- ~ Support the development of a Customer Service Charter developed by the CSC’s and State Water.

Should you have any queries regarding the above comments, please do not hesitate to contact the RGA office.

Yours sincerely

(signed)

DEBORAH KERR

MANAGER – POLICY & MEMBERS