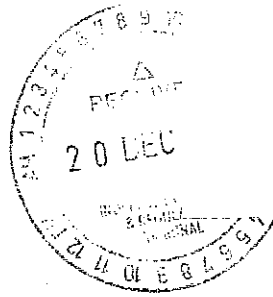


Doc No 204/11760 23/15



Bulk water prices from 2005106
Independent Pricing and Regulatory Tribunal
PO Box Q290
QVB Post Office
SYDNEY NSW 1230

Dear Sir,

Thank you for the opportunity to submit my thoughts on the bulk water prices from 2005106 issues paper.

The majority of the issues paper concerns regulated rivers and I am unable to make any comment on that usage.

My irrigation licence is held on an intermittent, short flow coastal creek which is broadly and incorrectly bundled into the unregulated river category for payment of charges. I call upon IPART to broaden the unregulated categories to reflect the real world of water availability and usage for such creeks. IPART has again not considered the no flow situation of coastal creeks. In the ten years I have owned this property the creek has regularly been dry or with so little flow to make irrigation impossible and with the added requirement that the environment has first claim to all water. Recently the creek was effectively stopped between August 2002 to February 2003 and from August 2003 until last week when we had over best rain ever.

I note in attachment 3 that the water flows in unregulated rivers are not influenced by State Water's operations and therefore the costs to be recovered from users largely relate to natural resource management costs. State Water is not active in any way in my area except for sending accounts which I will detail later. The Department of Infrastructure, Planning and Natural Resources (DIPNR) is not very active in my area with very limited contact although last May they did reveal plans which will further restrict may access to irrigation water if and when some is available. Under new plans I will be prevented from pumping when my creek flow drops to a certain level, nominated as 20% of the time. In other words for 100% of the time when I desperately need water my "share" is ZERO and the environment gets all water. I also challenge the fact as a level 4 user on a four level scale I have to pay for water at a higher rate than the higher priority level users above me. I would have thought that all users from level 1 down would pay at a rate directly proportional to their level of security.

IPART must recognise that for many coastal creeks were it not for a few irrigators all the water would quickly run to waste into the South Pacific Ocean.

Throughout the issues paper reference is made to the impactor pays and the beneficiary pays approaches. I can not be an impactor as I do not generate any costs for taking some water before it runs to waste so I must be a beneficiary. But am I the only one to have to pay the costs. If I go to the trouble and cost of pumping some water from the creek before it flows to waste into the ocean I would produce more and/or bigger animals for sale. Does this not mean that there is more work

and/or product for the people downstream from me. Should not the stock carrier, the stock agent, the saleyard operator, the next stock carrier, the abattoir workers and owners, the wholesalers and retailers of my product, consumers who may get a higher quality product and the country which may earn some foreign exchange if my product is exported, be all considered to be beneficiaries of simply pumping some water. The community should be thanking me for the initiative of creating economic activity by improving my output and not trying to screw a few irrigators simply to support a government created bureaucracy in empire building mood.

I note that for unregulated rivers about 30% of efficient costs were to be collected from users to fund the Water Resource Management (WRM) activities. This is far too high given that users have no input to or consultation about what the government is going to do with WRM and that WRM will be done regardless of the number of irrigators on a stream. For my creek there is no connection between the provision and use of water services and the WRM activities undertaken.

The issues paper mentions in several places the claim that unregulated users would have from 2000/01, a two part tariff structure that included a fixed charge (allocation) and a variable charge based on usage. This has simply not happened and I continue to argue with State Water the interpretation of your determination.

My irrigation system was reconfigured in 1999 to make it more water and energy efficient and included water metering facilities. My licence was converted from area to volume on 13 September 2000. State Water has done nothing to comply with your determination and provide me with usage based accounts. I have not accepted the account for 2002/03 and interestingly have not yet received the account for 2003/04 although it is normally sent in September. In my letter to the Minister for Utilities of 10 May 2004 about the State Water account (IPART received a copy of the letter dated 1 June 2004) I mentioned that I would notify State Water of my usage for 2003/04 in July 2004.

On 15 July 2004 I phoned State Water to advise of my water usage but the officer (name available) would not at first accept my information until I said I would write to Mr Sartor and ask why my usage information was not to be accepted. The officer quickly changed tune and took the usage figure and passed me to the finance officer of the unit Mr [REDACTED]. I confirmed the usage with Mr [REDACTED] as 2 ML and he stated that he would have the Customer Service Officer Mr [REDACTED] phone me about the usage. I have not heard from Mr [REDACTED] yet and as it was only 5 months ago my call is obviously on his to do list. My allocation of 78 ML for which I pay, has no meaning save for the account falsely issued by State Water. The 5 year licence fee I pay to DIPNR should cover all access charges. In the ten years I have held the licence the only contact I have had with them about fees was a phone call in late 2000 to ask if I still had a pump on the creek. So they do very little except for sending the account and banking the cheque.

In précis IPART must recognise the real world situation of intermittent, short flow coastal creeks and the unreliability of supply. The five year irrigation renewal fee should serve as the allocation fee as it is no more complicated a process than registering your dog and all water when available and used should be then paid for on a user pays system.

Yours sincerely

Stephen Crossing