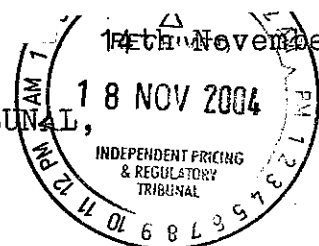


PROPERTY OWNERS' ASSOCIATION OF N.S.W. INC.

Established 1950

Incorporating: Private Hotel & Boarding House Division

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REVIEW OF METROPOLITAN WATER AGENCY PRICES. ISSUES PAPER.

The Association appreciates the opportunity to comment on the above Issues Paper.

Before commenting on the above Issues Paper, it seems necessary to refer to submissions made on previous Issues Papers dealing with allied subjects concerning the the supply of water pricing policies. e.g.

Submission dated 2nd Fenruary 2004 on Issues Paper on "WATER PRICE STRUCTURES IN THE SYDNEY BASIN"

"The Association fully endorses the opening statement of the Issues Paper in para 2.1: "Sydney is facing a potential water supply shortfall. Demand for water in Sydney is outstripping the sustainable supply available under water supply system performance standards." except that the supply shortfall is not, or is no longer potential. It is actual and it has already become necessary to try to restrict levels of consumption.

We also agree that the imbalance between supply and demand is likely to be even greater in the near future. It is also pointed out in para 2.1 that the "traditional" response to increasing demand and of population growth, of building more storage dams is no longer available, as the NSW Government has ruled out this solution on environmental grounds.

The object of the Paper is to investigate how the price mechanism might be used to reduce the demand for water in the Sydney basin.

We fully agree that the price mechanism is a most effective tool for restraining wasteful water consumption. It is submitted, however, that an essential feature of any introduction or extension of the price mechanism must be the extension of the price mechanism and its application to ALL the water consumed, BY ALL consumers. In other words, the "user pays" method must be extended to all consumers by the fitting of water meters to ALL premises or installations where water is being used/consumed, including ALL residential houses, flats or units.

From 1993 the former property value based water pricing was largely replaced by a tariff consisting of a fixed "access" component and usage charges based on water consumed. This was a distinct improvement for achieving a more responsible water consumption. A very large and important segment of the consuming population was, however, overlooked. Namely, the occupants of strata title and other residential buildings, containing a number of separate dwelling units/flats/lots. Practically all of these buildings have ONLY ONE water meter per property. Thax water usage

charges for such buildings are payable not by the consumers/users (the residents of the individual flats/units) but by the owners of the buildings, the owners corporation or the accommodation providers, i.e. non-consumers. Thus the water consumption of the actual users is not restrained by the price mechanism. Under the Residential Tenancies Act, tenants may not be charged by the lessors for the water used in the premises, unless the premises are equipped with individual water meters, and even then, only if this obligation is included as a term of the Residential Tenancy Agreement.

It is considered that Sydney Water and IPART fail to appreciate the huge volume of water that escapes from the "user pays" discipline under the current system. It is stated under para 2.3 that 70% of water provided by Sydney Water is for residential purposes. The estimate by Sydney Water that only 46.6% of the water is used by units/flats is, however, very questionable.

The following quotes from "Strata Schemes Management Act" "Report 2001" (Dept of Fair Trading) demonstrates the actual position: "Since the first strata legislation commenced in NSW with the Conveyancing (Strata Titles) Act 1961 over 60000 individual strata schemes have been registered as the av. number of lots in strata schemes is estimated to be 10-12, there are believed to be well over 600,000 individual strata lots in existence. It is estimated that close to a quarter of the population of NSW (total population 6.5 million) live in within a strata scheme."

More recent statistics are provided. in "LIVING IN STRATA DEVELOPMENTS, Issues Paper, Dept of Fair Trading, May 2003

"By 2003 the number of strata schemes in NSW has risen to over 65,000, with 700,000 or more individual strata lots in existence. An av. of 10 new strata plans are now being registered every day.

Even more recent statistics are provided in the Second Reading Speech of the Minister for Fair Trading when introducing the Strata Schemes Amendment Bill on 4-12-2003: "There are nearly 70,000 strata schemes in NSW, ranging from simple two-lot suburban developments to massive 700 lots high rise complexes. Medium density and high rise density living is becoming more and more a part of urban life. and strata title is by far the preferred choice for those who develop and market these buildings."

Similar views were expressed in our submission on the Issues Paper "WATER DEMAND - SUPPLY BALANCE", dated 23rd March 2004"

"One can only agree with the summing up of the basic position by IPART, i.e.

"Water is a limited resource, so maintaining a balance is critical. The level of water in the water supply storages has dropped to 55% and demand for water has exceeded the estimated sustainable yield available from those storages.

Over the past 20 years demand has regularly exceeded the estimated sustainable yield from the water supply storages Sydney's steady population growth of about 50,000 people each year, there is a clear need to better manage demand for water.

The position, as outlined by IPART, clearly demands the formulation of new policies and of development projects. Not just nibbling at the edges of the existing position, which is already not working and will not work without fundamental changes.

Sydney Water seems to be unable and unwilling to introduce and implement new policies to enable it to meet its responsibilities as the provider of water. Hence, it is submitted that it becomes the responsibility of IPART to examine how current policies and practices need to be updated. Then impose new policies and procedures on Sydney

Water, i.e. in its Operating Licence. In order to enable S.W. to better meet its responsibilities as the provider of reliable water supplies for the consumers of Sydney.

The Key ISSUES posed in the Issues Paper may be answered as follows:

(a) HOW CAN THE REGULATORY FRAMEWORK BE USED IN THE MANAGEMENT OF SYDNEY'S WATER SUPPLY AND DEMAND BALANCE?

ANSWER: As the supply is determined by the weather and by government restrictions, DEMAND MUST BE RATIONALISED by fully introducing the "user pays" policy. This policy is prevented from operating when about 40% of consumers are at present exempt from the discipline imposed by having to pay for the water used or wasted by them.

(b) WHAT ARE THE APPROPRIATE LICENSE CONDITIONS?

ANSWER: The Catchment Authority is prevented from providing additional storage for water. Hence availability is determined by climatic factors and by government policies. Thus the activities of the Catchment Authority cannot be controlled by licence conditions.

(c) SHOULD DEMAND MANAGEMENT TARGETS CONTINUE TO BE INCLUDED?

ANSWER: DEFINITELY. Strict policies must be imposed on Sydney Water to oblige that organization to urgently introduce measures for conserving available water resources. The first and most important measure should be to instal individual water meters for all premises (residential, commercial, industrial) so as to strictly implement the user pays policy, irrespective of the alleged cost of installing and reading these water meters. Water is a scarce and precious commodity that must be preserved, conserved and effectively used, irrespective of the cost of installing such a control mechanism. A community without a proper water supply is destined to die. Similarly, as will be outlined in this submission, all wastewater, stormwater etc. should be recycled, preserved, purified and returned into circulation.

(d) SHOULD OTHER TARGETS BE IMPOSED IN SYDNEY WATER'S LICENCE, SUCH AS TO REDUCE WATER LOSSES, REUSE, RECYCLE, HARVEST STORM WATER? DEFINITELY. Sydney Water must be induced/forced to adopt and implement more socially responsible policies to ensure that scarce and diminishing water supplies are not wasted and lost to the community.

REFERRING to the Issues Paper under consideration by the Tribunal, it seems that the person or persons preparing, editing etc. this PAPER have failed to study and take into consideration some reports and research studies conducted and published by IPART itself e.g. "THE DETERMINANTS OF URBAN RESIDENTIAL WATER DEMAND IN SYDNEY, THE BLUE MOUNTAINS AND ILLAWARRA" (IPART Secretarial Working Paper, April 2004) The author's own summary: "The results show that the PAYMENT OF WATER USAGE CHARGES by the household has the MOST SIGNIFICANT impact on average annual water demand. Households are estimated to use an average 19% more water if they do not pay water usage charges. The results also show that the number of occupants of a household has a significant and large impact on average annual water demand. Income has a significant, but small effect."

Some relevant statements in the IPART Working Paper:

"The survey data has allowed the Tribunal to gain a better understanding of the characteristics of water used by households, by conducting a partial analysis of the relationships between income, consumption and household size amongst others. This paper takes the analysis a step further by considering the independent relationships between various end uses and household characteristics."

"Whilst water is used for drinking purposes to sustain life, this is a very small proportion of overall water demand in a community. Most water is demanded for indirect uses, such as for garden watering, clothes and dish washing, flushing toilets, swimming pools and spa uses and car washing among others. Water therefore is an input to the enjoyment of a range of other benefits around the house."

Another IPART publication on the subject is "RESIDENTIAL WATER USE IN SYDNEY, THE BLUE MOUNTAINS AND ILLAWARRA" Results from the 2003 household survey. Research Paper RP2, April 2004.

Key findings: "The statistical model suggests that the household size and NOT RECEIVING A WATER USAGE BILL are the MOST IMPORTANT drivers of household water use. The survey data themselves indicate that household composition and dwelling type are also important. a household which does not pay their water usage charges, all other things equal, uses an average of 19% more water compared to households that do. It also indicates that if these households were able to reduce their water consumption to the same as equivalent households who do receive a water usage bill, then approximately 18 GL of water could potentially be saved."

"Key findings are:

(a). Larger households generally consume more water than smaller households.

(b) Households that live in houses consume more water than those that live in units.

(c) Households that rent public housing tend to use more water than those who rent privately or own or are paying off their own home.

(d) Households located in the Illawarra region use less water than those located in Sydney.

Larger households make up 18% of the actual households in Sydney Water's area of operation, but 47% of those that used more than 500kL of water per annum. Large households consumed an estimated 79GL of water in 2003 which represented 13% of Sydney Water's total water demand for that year.

Households that rent public housing use an av. of 50kL more water per annum than those that rent private housing and an average of 27kL more p/a. than households paying off their own houses.

The 2003 survey also, found that the distribution of consumption within income groups is highly variable and not all high-consumption households have a high income. e.g. around 33% of low income households consume more than the average of 250kL p.a., while the same proportion of high income earner households consume less than the average. Other household characteristics are more important than household income in influencing water use. We found that for low income group, the high consumption households were more likely to rent public housing than low income households in general; - 55% of high water users rent public housing compared to 22% of all low income households. The High water users were also much less likely pay water usage charges, only 44% of low income, high consumption households paid water usage charges, compared to 88% of all low income households and 90% of all high income households.

Does paying water usage charges influence water use?

Key findings: (a) around 40% of households do not pay their water usage charges. (b) households that live in houses and do not receive a water usage bill use 4% more water on average than those that do.

WHAT FACTORS are the key drivers of household water use?

(a) the largest and most significant factors influencing a household's water use are its number of occupants and whether or not it pays its own water usage bill.

(b) each additional member increases a household's water use.

(c) not receiving a water usage bill increases a household's water use by approx. 19%. Households that are considered not to pay their water usage bill include those that live in units without separate meters, those living in premises owned by the Dept. of Housing and those living in privately rented premises where the landlord does not pass on the water usage component of the bill.

COMMENTS ON THE CURRENT ISSUES PAPER.

1-2 MATTERS TO BE CONSIDERED.

With respect, the "broader issues" and "key agency matters" do not seem to emphasise the major issues affecting water supply problems that concern the consuming public, such as providing an adequate water supply that is reliable regarding the quantity, quality at a reasonable price to the consumer. Also that the price structure should be equitable i.e. to fully adopt the "user pays" principle of an individually metered water supply to consumers.

1-3 SUPPLY LEVELS.

It is well recognised that Sydney is facing a significant water supply crisis, a shortfall in both the short and long term.

It is also well recognized that water pricing is an important element in demand management. The first step in considering the effect of price, however, is to ensure that all water used is individually metered. Moreover that all consumers are individually metered, so that the price effect is allowed to exert its influence. It is reported in IPART surveys that 40% of water used (a conservative estimate) in the Sydney region is used by consumers whose water use is not metered. This estimate was probably made before the mushrooming of large apartment blocks with 100-300, even 700 units. So, the logical first step in any effort to secure responsible water use, should be the fitting of individual water meters to all consumer household units. Thus to ensure that the price mechanism can exert its effect in securing more rational water consumption practices.

It should be emphasised that water is a highly valuable commodity, that should be conserved at all costs, i.e. the cost of installing individual water meters to stem rising consumption, should not be a key factor in deciding this basic long term policy objective. The key objective is to achieve a rational and economical use of a scarce but essential commodity.

The planning and introduction of higher water charges under the present system, where 40% or more water users do not pay for it, would not ensure a restraint on water consumption, but would only increase the cost burden of non-consumers, e.g. of strata corporations and the providers of rental accommodation.

1.4 CONTEXT.

It is reiterated that the major problem confronting the community is not cost pressure on the supplying authority, but pressures created by supply/demand imbalance. The way to reduce the supply-demand imbalance is not by increasing the price of water, but to bring all water used under the price mechanism. IPART surveys have shown that households that do not pay for water, use much more water than those that pay for it. So, by applying the existing price to ALL consumers, less water will be used/wasted. Moreover the income of the supplying authority will also automatically increase.

Thus, the review of the current price structure is PREMATURE, until the existing prices have been fully implemented and applied to ALL water consumers/users.

The statement that "The Tribunal is aware of and concerned about potential pricing impact on vulnerable customer groups, such as pensioners, low income households and large households" is appreciated, but it is misdirected. Water is an essential commodity, but so is e.g. the supply of electricity and gas. Yet these services are individually metered and the consumers have to pay for what they use/consume or the supply is disconnected. There is no reason why special considerations or concessions should apply to water. The Tribunal should also take into consideration that a high % of strata unit owner residents are elderly, many are ill and invalid, most are pensioners. They are habitually low water users, yet as unit owners, they have to pay higher strata

levies because the funds are required to pay for the water used by younger renters who habitually are high water users (without paying for it). The unit entitlements for strata levies, have no relationship to water consumption by residents. The strata corporation is not allowed to pass-on to residents the water rates paid.

2. REVIEW PROCESS.

It is noted that expert advice will be sought on matters such as handling waste water (sewerage) and stormwater. This is timely and very important. All matters concerning the conservation of water resources should be closely examined and considered. It is suggested that IPART should examine the proposal by "Services Sydney" company for treating and recycling virtually all of Sydney's waste water/sewerage and returning the treated water into circulation. This probably solving Sydney's immediate water problem, saving some 1000 million lit. per day from being discharged into the sea and thus being lost from recirculation. The proposal has apparently been under consideration (held up) by Sydney Water since 1998. (See Daily Telegraph, 17-3-2004)

4.2 INCENTIVE REGULATIONS

It is stated in the Paper that a critical element of the price setting process is the determination of the revenue requirement of the regulated businesses. It is not clear how IPART can determine the revenue requirement, when it is clear from IPART's own surveys, that at least 40% of water users do not pay for the water used. Wouldn't it be logical, as a first measure, to stop the revenue leak of the water system, insist that all water consumers should have individual water meters installed and be required to pay for the water used. Irrespective of the cost of installing the meters, the increased revenue gained will more than pay for the installation. Once the revenue leak has been eliminated, the operations of the water industry will be on an entirely different basis. Water pricing can then be reviewed on a sound and equitable basis.

4.3 SERVICE QUALITY.

The first requirement of a soundly based service quality is to install individual water meters, so that all water users should pay for the water used and all users are treated equally.

4.4 SYDNEY CATCHMENT AUTHORITY.

The activities of the Authority in providing adequate high quality water is inhibited by the government prohibition on building additional storage dams or increasing the holding capacity of existing dams.

4.5 CUSTOMER IMPACT.

Comment has already been provided under para 1.4 that concerns of the Tribunal on how price increases will affect vulnerable consumer groups, while appreciated, is misplaced. Water is not the only commodity widely distributed for consumption; it should not be the subject of special concern, electricity, gas etc. are all separately metered and users have to pay for the amount used by them. Also, under current circumstances, occupants of public housing do not pay for the water they use, the Dept. of Housing does, so price increases will not affect them.

5. REVENUE REQUIREMENTS.

Obviously, the supplying authority requires adequate revenue to meet its operating costs. Therefore, one would expect it to explore all avenues for increasing its revenue. The fact that at least 40% or more of water consumers do not pay for the water they use, so the correction of this defect in management should be a logical first action by the supplying authority, Sydney Water, to explore and develop. One would normally expect them to promote such policies (individual metering) instead of obstructing them. There is obviously a need for a policy shift towards developing and improving such obvious sources of additional revenues. The suggested easy option of just increasing water rates will not have the desired effect of reducing water consumption, while such a large segment of consumers has no incentive for reducing consumption, when they do not pay for the water, irrespective of its cost. It is most surprising that there do not appear to be any proposals for plugging such an obvious defect (lack of individual meters) while proposing plans for increased prices, which will not have the desired effect on consumption.

5.1 OPERATING EXPENDITURE.

The Issues Paper states: "The Tribunal is seeking to determine the costs that an efficiently operating business would incur in operating the business effectively, without compromising service quality". Obviously, a service provider or business is not operating efficiently when 40% or more of its customers do not pay for the product consumed by them. It is equally obvious that the first step in rectifying this inefficiency should be to instal individual water meters to collect the revenue due (and at the same time conserve scarce water resources by reducing wasteful water consumption).

5.2 CAPITAL EXPENDITURE should be directed at achieving efficient water use and so also conserve a scarce resource.

The first essential step in a rational policy should be to rectify the current inefficient method of charging for water, i.e. by installing individual water meters for all consuming units, whether they are residential, commercial or industrial. This will increase revenue and induce responsible water using practices. The capital expenditure involved can be expected to be recovered by the increased revenue and at the same time reducing the need for further huge capital expenditures for the construction of dams and other water storage facilities.

The second important measure requiring capital expenditure is the construction of filtration plants to purify waste water - sewerage and storm water - and recycle it for recirculation in the water system. This would also stop the present highly objectionable practice of polluting the sea by pumping into the sea waste water which has been barely treated to remove polluting substances. These treatment plants should be located at strategic locations throughout the suburbs and so avoid the huge cost of pumping waste water to the seabord for disposal into the sea.

It was reported in the press that the recently completed water-pipe to take rainwater run-off to the North Head pumping station and disposal into the sea has cost some 40 million dollars. This was a completely wasteful expenditure. The money should have been spent on a filtering plant (Australian invention) for recycling and thus increasing the water availability for the population of Sydney.

Treatment plants should also be installed in industrial plants using large quantities of water, resulting in the discharge of large quantities of effluent. The effluent from such industrial establishments should be treated in situ on the premises. The treated water should then be recycled for re-use in the plant under reference. Thus, no waste water will be discharged from such plants into the sewer system and no polluted water will be discharged into the sea.

5.3 COST PRESSURES.

These are inevitable. They involve long term supply and demand requirements. It is obvious that demand can be expected to increase, while the supply is static, even declining. Therefore capital expenditures must involve long term planning for the future. The obvious demand is for the conservation and efficient utilisation of existing and future water resources. i.e. immediately stop the wasteful discharge of barely treated waste water into the sea. Future capital resources should be used in the most effective manner, in order to conserve and recycle water resources.

6.1 PRICE STRUCTURE AND TRANSITION.

The Issue Paper states: "The Tribunal will shortly complete a review of water price structures for the Sydney Basin, which analyses whether changes to the current wholesale and retail price structure could help reduce the demand for water"

It has been repeatedly stated, even as a result of IPART surveys that price is the most important factor influencing water consumption. It must, however, also be emphasised that the price factor cannot exercise its influence, when 40% or more consumers do not have to pay for the water they use. In such a situation, as exists in Sydney to-day, a price increase will not reduce the rate of consumption, as most of the increase will be payable by non-consumers, such as the strata corporation and the accommodation providers. Under such circumstances, the price increase will miss its target, i.e. the water consumers.

6.2 CONSUMPTION FORECASTING AND REVENUE VOLATILITY.

It is submitted that it is not regulatory changes that are required in the water industry, but a simple change in policy and its implementation. I.e. instal individual water meters for all consumer units, whether residential, industrial or commercial. This, by itself, will radically change the consumption pattern and the total volume of water used. If subsequently to this basic requirement, the price of water is varied, this will affect the consumption of all classes of consumers. Consequently, it will also have the desired effect on the amount of water used. In Sydney, water is a scarce commodity. The incentive of the suppliers - Sydney Water - should not be to maximise profits, but to provide water supplies to consumers at an economically adequate price and so meet the requirements of both the supplier and the market. If price increases are considered necessary to reduce excess consumption, then this should be introduced only after the individual water meters have been installed, - in order to ensure that the price factor will affect consumption (i.e. it is not imposed on non-consumers).

6.3 STORM WATER.

The primary purpose of storm water management should be to conserve this water resource for recycling and for adding to the water available for reticulation. I.e. the policy regarding storm water should be to preserve and use it and NOT how to get rid of it.

As the water is needed for recycling, the institutional responsibility for collecting and filtering it should be that of Sydney Water. Storm water is a valuable commodity that should not be wasted by pumping it into the sea.

6.4 MISCELLANEOUS CHARGES.

Industries whose procedures result in trade waste, i.e. polluted waste water, should be encouraged, even compelled or subsidised - to instal filtering and purification equipment in their premises, that will enable them to re-use the water. Thus the water will be recirculated within the factory or plant. This will eliminate or at least reduce the use of potable water for industrial purposes - and at the same time, eliminate factory waste from polluting the

the sewerage system, which results in the need for elaborate filtering and purification processes at public water plants.

6.7 FIRE SERVICE CHARGES.

It is considered that a reasonable method and rate of charges be examined and introduced. When a fire occurs, huge volumes of water are used up. It is reasonable to expect that the supplying authority should receive recompense for making potable water available for this service and public purpose.

6.8 RECYCLED WATER PRICING PRINCIPLES AND SEWER MINING.

It is laudable that "The Tribunal wishes to encourage water businesses to promote and expand the use of recycled water". It is considered that "sewer mining" is an unfortunate term, giving an incorrect image to the procedure and process. "Utilisation of waste water" might be a better term to describe a very desirable development in the total utilisation of a resource, that otherwise would be wasted at great handling costs. Parties interested in undertaking such industrial development should be encouraged - even subsidised at the initial establishment stage - rather than use it as a source of revenue, as suggested, and thus discourage this highly desirable development in utilising waste materials. This is a highly useful and beneficial development from every aspect of the case.

It is necessary to refer to the article "2bn PLANT TO PUT sewerage to better use" Daily Telegraph of 17 March 2004. A group called Service Sydney has apparently been in discussion with Sydney Water since 1998 about implementing the project. This project, if implemented would be designed "to stop almost all Sydney's sewerage waste going into the ocean and divert it to western Sydney for irrigation, domestic use and river flows" It is claimed that "this project would close three main sewerage outfalls - Bondi, North Head and Malabar". It is stated that Sydney water is still "considering" the proposal by a private consortium of using the sewerage which apparently Sydney Water claims to "own". It is understood that the case has gone to the National Competition Council for reviewing Sydney Water's apparent claim of monopoly, which it fails to utilise for the benefit of the public and society.

Reference should also be made to the publication "WATER REUSE PROJECTION TO 2000" published by Sydney Water in May 1995. This publication outlines the position and possibilities for utilising waste water, but nothing appear, in fact, to have been implemented during the past 10 years.

The following quotes from Sydney Water's own publication might illustrate the position as it was in 1995:

"to protect the environment, sewerage treatment plants have traditionally been required to remove suspended solids and other oxygen demanding substances and are not designed to remove large amounts of total dissolved solids. Some potential markets in industry, however require water that has a low total dissolved solid content. To overcome this obstacle Sydney Water through its trading arm AUSTRALIAN WATER TECHNOLOGIES and ITS AQUA REUSE BUSINESS is refining its product mix to match the quality desired by various markets". (this is understood to be the reverse osmosis process developed and marketed by MEMTEC).

"AQUA REUSE has developed a transportable and compact "sewer mining" system incorporating inventive Australian made technologies, that allows new sewerage to be extracted direct from pipes for processing. The Aqua Reuse System also allows the trade waste water produced by many industries and businesses to

be processed, reclaimed and reused on site".

Reference could also be made to "WEST CAMDEN SEWERAGE TREATMENT PLANT UPGRADE AND AMPLIFICATION" published by Sydney Water in 1999. e.g.

"The study concluded that option C, centralised treatment with the potential for recycling is the option that best met the future quality and growth requirement for the Hawkesbury- Nepean River system"

Many PLANS, projects and BRAVE WORDS, but NO ACTION to utilize this obvious resource and to conserve the treated water for useful economic purposes.

The present practice is futile and belongs to the 19th century, when there was plenty of water and a low population density. It is obviously uneconomical and horribly wasteful to process water to potable standards, use only 2% for drinking purposes (Sydney Water's own figure), then discharge it into the ocean, after minimal cleaning treatment, thus not only wasting a valuable resource, but polluting the sea for many miles from the underwater outlets. The obvious, logical and economically sound procedure should be to properly treat and filter (the suitable plant is available in Australia) to make it suitable for reuse throughout the community, as required.

CONCLUSION.

It is appreciated that the Issues Paper is concerning mainly water pricing, while the comments in this submission deal mainly with the supply/ demand problem, which, it is considered should be dealt with before pricing.

It is considered that pricing matters, i.e. increasing the price of water is ineffective, unless ALL water provided to consumers is individually metered and the cost charged direct to those consumers.

Considering water pricing before individually metering all water supplied and charging the cost to the actual individual consumers amounts to an "upside down" and inappropriate procedure.

Submitted for the consideration of the Tribunal.

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Chairman, Tenancy & Strata
Committee