

Jamesville
6273 Pooncarie Road
Wentworth
NSW 2648
13th September 2013

Submission to ACCC Enquiry on State Water Pricing Proposals

From

South West Water Users

South West Water Users (SWWU) represents NSW irrigators who remove water under licence on the Lower Darling River South of Menindee Lakes and the Murray River downstream of the Murrumbidgee Junction to the South Australian border.

SWWU is a member organisation of NSW Irrigators Council (NSWIC). We support and endorse their submission to the ACCC inquiry. The comments which follow highlight issues which are specific to the irrigation industry in this region.

Our comments are as follows.

- We have significant concerns related to State Water proposals for large increases in charges related to meter reading. Of particular concern are significant charges proposed for telemetry systems when there are no such systems yet in operation in this region. They are little more than concepts at this stage and we would submit it is grossly inappropriate to levy significant charges on systems which are not yet even designed – let alone implemented. The area which we represent is likely to face charges at the higher end of the proposals due to very poor mobile phone coverage. It is also unacceptable that we are expected to pay vastly increased fees for a system which is claimed to be more efficient. The fees should decrease – not increase.
- We are concerned that there are already examples in this region of Government purchase of water licences leading to avoidance of State Water fees and charges. Under the State Water proposals, those of us remaining – our constituents - are expected to pay these fees. The specific example in this region is the purchase of a large Supplementary Licence by The Living Murray Program (TLM) which was previously held by Tandou Ltd. Avoidance of fees by TLM has left a gap of several million dollars over the last few years for which our members will be liable. We

would suggest the ACCC determination should require State Water to identify all such avoidance and not recover these fees from remaining irrigators.

- We have concerns about the increased proportion of fixed fees on licences with poor reliability of supply – and in this region there are some licences with conditions which prohibit usage in the vast majority of years. A high proportion of fixed fees on a licence which can only be used for several years each century is grossly inequitable.

We appreciate the opportunity to lodge this submission. We can be contacted as per the details below for any further information or comment.

Yours faithfully

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