

**Bullatale Creek Water Trust
72 Junction Street
Deniliquin NSW 2710**

Water Branch
Australian Competition and Consumer Commission
GPO Box 520
MELBOURNE VIC 3000

8TH February 2010

**SUBMISSION: PROPOSED AMENDMENTS TO WATER MARKET RULES
2009 AND WATER CHARGE RULES (TERMINATION FEES) RULES 2009**

The Bullatale Creek Water Trust is approximately one hundred years old and manages the water supply system to a small number of landholdings in the Southern Riverina region of NSW.

The implications of the ACCC's proposed amendments to Water Market Rules 2009 and Water Charge Rules 2009, could place potential risks to the Bullatale Trust.

In addition, Small Infrastructure Operators do not have the operational resources to adequately assess or absorb the recommendations of the ACCC.

We note in the ACCC report specific reference is made to Murray Irrigation, but it is unclear from the report what the implications are for smaller infrastructure operators.

We urge the ACCC to formally consult with smaller infrastructure operators to fully determine what the risks and implications are, prior to recommending changes to Water Market Rules and Water Charge rules.

The Bullatale Trust supports the concerns outlined in NSW Irrigators Council submissions to the ACCC.

The Trust seeks further advice from the ACCC in relation to rule 16. As currently proposed this would be of particular concern.

The Trust urgently requests consideration and consultation with smaller infrastructure operators as part of the development of the ACCC recommendations.

