

W. J. & A. SEERY  
PARTNERSHIP



2nd February, 2016

Review of the water charge rules  
Australian Competition and Consumer Commission  
GPO Box 520  
MELBOURNE VIC 3001

Dear Sir,

I carry on an irrigation farming business in a family partnership in the Macintyre and Gwydir Valleys.

I am writing to you in regards to the ACCC Review of Water Charge Rules – Overview of the Draft Advice (the Draft Advice).

In their words *the ACCC Draft Advice is targeted at promoting efficient and sustainable use of water infrastructure, facilitating effective water markets and improving transparency of charging arrangements, while addressing the need to reduce the burden on the sector.*

In this regard, I make the following submissions:

1. **Water Sharing Plan**

It is of great concern that the Draft Advice makes no comment as to the impact of the Water Sharing Plan (WSP) for the valleys in which my family carries on business.

As you would be well aware, the WSPs have been an initiative to balance the competing needs and water usage for town supply, rural domestic supply, stock watering, industry and irrigation whilst also maintaining a sustainable environment and river system.

I consider this balancing act to be at the core of a number of issues that the Draft Advice purports to address and it is alarming that no consideration of these factors is given.

Before we can talk about promoting sustainable use of water infrastructures and reducing the burden on the sector, we need to talk about the impact the WSPs have.

2. **Environment taking priority but burden falling on the Irrigators**

The environment is taking priority and yet the burden of maintaining the system is falling on the irrigators.

In the Border Rivers system, there needs to be a flow of 10,000ML before holders of Supplementary licences have a right to extract water. However, even at times where flows are in excess of 10,000ML the DPI Water/Water NSW have imposed embargoes to prevent pumping. Despite the implementation of these embargoes, water charges are still issued.

Some years ago an embargo was imposed to deal with the blue green algae problem and more recently an embargo was imposed in order to allow water to flow through to Menindee Lakes and Broken Hill. When embargoes like these are imposed there should be no water charges imposed for that time.

Further, the irrigators are not provided with the opportunity to get back the water which they have lost as a consequence of these restrictions (for example, in subsequent flows there are no reductions in the 10,000ML flow conditions so that irrigators can extract additional water to compensate what they have previously lost).

A balancing act and a give-and-take is inevitable, but why should the irrigators be forced to give up their right to water and DPI Water/Water NSW still take from them in charges and fees.

As the financial loss suffered by Irrigators when Government agencies deny them access to extract water which they are normally entitled to, is far in excess of annual water charges it is my submission that all annual charges be waived.

### 3. **Sustaining the basin and the impact on our Communities**

It has become a pattern that water is being taken from the upper sections of the Murray Darling Basin. It has now become uneconomical to sustain existing developments in the upper section of the Barwon.


When considering who should bear the cost there needs to be consideration of who receives the economic benefit. I submit that where charges will have a greater economic disadvantage to some users, then this should be taken into account in the sharing of the costs.

Recently I took the opportunity to stop at a number of the communities around my district. Previously, these had been vibrant towns and a central hub for our farming communities and workers. Now it is not hard to see that these communities are suffering.

In almost every street it was clear that families were leaving town with substantial amounts of vacant and abandoned houses/lots –vacant houses and lots that are unsellable because of the state of these communities. I have taken the time to show you a very small collection of these communities.

For all the efforts and sacrifices made in an effort to maintain the basin, it is our communities which are bearing the brunt of the economic impacts.

Yours faithfully



WJ & A Seery Partnership

Per: John Seery

