

I have participated in the ACCC Water Infrastructure Rule Charges, ESC's GMW water plan 4 approval and more recently the Water For Victoria Discussion Paper. I am deputy chair of the Murray Valley Water Services Committee.

The Water For Victoria Discussion Paper was issued with mistakes and lack of credible information. I wrote in my reply the following paragraph. I have found the Water for Victoria Discussion Paper difficult to respond to with the "We will know if we have succeeded when," documentation with minimalist detail and costings. There are overlaps with the differing titles for example the framework for water entitlement is detailed in the Water for Agriculture and not in the Water Entitlement and Planning Frameworks. There is very little specific detail on how Victoria will respond to discrepancies with the Water Act 2007. Declining population in rural areas will have a much greater impact on revenue generation than population growth, this has not been discussed at all in the Discussion paper."

Moving on from the discussion paper the 'delivery share review' has the same problems as the discussion paper. Firstly the delivery share review fails to acknowledge the submissions to the discussion paper in name or content. This really shows the arrogance self minded attitude of the department with a preconceived idea of what will change, with the process a mere formality. As a WSC member we were asked to attend a GMW workshop at Kyabram. DELWP staff asked us for ideas to start the delivery share review I suggested they start with the submissions to the water for Victoria.

The review fails to mention the delivery share equivalent that is used for the environmental water uses. 'Prudent discount' is used for the calculating payments which could be as low as \$2. The ESC will approve increases in Infrastructure Access Fees based on the EWH's paying nothing.

The review also fails to mention uniform pricing, remember we went through this nonsense only two years ago when GMW told us that in time our fees will decrease. There was not one submission or any public meeting in favour of the 5:1 outcome. It is now known the uniform pricing was used to hide the extra increases in districts that the EWH has water delivered through, spreading the costs across all districts helping mask the extra costs. The savings from uniform pricing was \$480000 pa but now the GMW Transformation Program will use valley /district cost centres, the way the ACCC Peel Valley decision recommended so there are now no savings through uniform pricing. Under district pricing Murray Valley IAF's would have been lower.

The review fails to mention the Infrastructure Usage Fee, this fee has almost doubled in five years and Murray Valley had the largest increase under uniform pricing.

The review fails to explain the largest increase to small water users is not IAF but Service Point Fees. Some of these customers had meters fitted when they sparingly used water, their cost increased from \$350 per service point to \$750. In the delivery share review the word "fair" was used, well the VEWH benefited from the meter change not irrigators.

The review fails to mention the impact of Government water buy backs. The Water For Rivers was a \$560 million Commonwealth fund to purchase water entitlement in 2007. This program purchased farms that had water entitlement attached to the sale, as the properties were listed before unbundling and were still listed immediately after unbundling. The program purchased the farms, took the water entitlement then sold the farm back stripped of water with all deliver shares intact and leaving a community burden.

During the NVIRP program GMW terminated delivery shares. Although being lawful no payment was made to GMW to recompense the loss of fees, it was all passed onto other delivery share holders, and this is not fair.

The delivery share review is nothing more than a reshuffling of deck chairs on the GMW ship Titanic. I do not support the option process, I believe this is an attempt to appease vocal disadvantaged

delivery share holders who are intent on having there delivery shares removed and DELWP passing the added costs to water users. The review mentions the Water Act when it suits however a review of the ACCC Water Infrastructure Rule Changes was also completed only recently and the options for volume based charges are not allowed under the Act.

DELWP failed to explain the appeal process to allow stakeholders to appeal decisions that are outside the framework of the Act. As the ACCC knows there is no such framework in place. For Commonwealth decisions our only process is the Administrative Decisions Tribunal which costs \$4500 to make an appeal and could cost you the farm in time and expenses. No one has made an appeal under this framework.

The State pretends there is legal recourse through the Ombudsman. VCAT cannot hear cases with government decisions, nor can the Energy and Water Ombudsman. Only the Victorian Ombudsman can hear concerns relating to State decisions. However the Victorian Ombudsman can only rule on content that totally changes the final outcome, "in their shoes" rules prohibit the Ombudsman from ruling on part determinations even if they were misleading, deceptive or outside the Act.

I took the Feedback sheet to nine irrigators and we all agree the Feedback Sheet is bias and the answers are geared to give favorably to options considered by DELWP.