

Australian Competition and Consumer Commission
Water Branch
Proposed reporting requirements—ACCC water monitoring
GPO Box 520
Melbourne Vic 3001

Via email

Thursday, 4 February 2010

Dear Sir/Madam

REVISED MONITORING REGIME – WATER CHARGE RULES AND WATER MARKET RULES

I write on behalf of the National Irrigators' Council (NIC) sub-committee for irrigation infrastructure operators all of whom will be subject to the proposed monitoring regime as released by the ACCC on December 3. NIC made an initial submission supporting the concerns of our members that the proposed requirements were onerous and outside the scope necessary for the ACCC to perform its functions.

We also called for the monitoring regime to be reviewed and released to stakeholders again before any advice was provided to the Minister and we are pleased that the ACCC has accepted our advice. We also welcome the fact that on this occasion, the ACCC has in fact listened to industry and reduced the size and complexity of its information request.

NIC reiterates its earlier concerns that the ACCC and other government agencies should be cognisant of the increasing demands for information placed on our members by state and federal government agencies, often at great cost. Naturally this cost must be passed on to their irrigator members.

We will leave it to individual operators to respond to the detail of the revised monitoring regime but we note general concern reported to us that there is still some way to go in terms of reducing the compliance burden on our members.

Yours sincerely,

Danny O'Brien
Chief Executive Officer