


Submission to CER on water charges.

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1. Water is not a commodity. Charging for water by units commoditises water and prepares water for privatisation once it is a commodity and charging is in place.
 2. Water is not free, as it appears in our taps or stand pipes it is public service utility that has exact costing, costing that is known and is funded by central taxation & motor taxation.
 3. Introducing a charge on water that is already paid for is a double tax.
 4. I oppose the introduction of water charges for the reasons above. While CER & Irish Water fulfil the dictatorship of the markets and the Troika without mandate from previous government or the current government (FF/GP had no mandate for water charges, and Labour / Fine Gael government sought no mandate at election blaming the existing MoU signed by the previous government.) I would like to point out the following points also.
 5. While I disagree with there being a charge fundamentally, if you do proceed to introduce metering and charges the people of Ireland will resist your tax.
 6. In Irish Waters submission executive summary 1.1 they lean toward a national charge, this would be preferable to a varying charge by location. Still I am opposed to a double tax principle.
 7. I would like to state that non domestic water should not be sold at a lower price to domestic water, regardless of the charging mechanism. If it is charged as a double or single tax companies should not be allowed to buy discounted water at the expense of the owner of water in Ireland the Irish People.
 8. Introduction of this double tax is a voluntary sell out of European Union Derogation from domestic water charges that Ireland holds from the EU water framework.
 9. CER must protect the water of Ireland from profiteers. No sell out of Irish water to private or for profit organisations.
 10. The current allowed annual allowance for a domestic home is 225 cubic meters per annum in a mix unit where business shares premises with domestic dwelling. Government has announced during this public consultation process that the allowance per home will be 30 cubic meters per annum, a reduction of 195,000 litres. At the current recovery cost this amount to an annual charge of €741 for the water than used to be allowed in the domestic allowance. As the average use per day per person 149 litres times the average number of persons per house was very close to the 225,000 litres the double tax bills for homes without other reductions (for health & children) will be in the region of €741. This is another robbery.
 11. Government has interfered in the duty of CER in setting the rate for water and for setting the allowances by announcing a so called "free" allowance. How can if be free in 85% of so called free allowance is stolen and we already pay for this water through a separate system of tax.
 12. In the CER document on non domestic water it says that domestic dwellings in non domestic units will pay no charge until the local authority migrate billing systems to Irish Water. This creates a 2 tier system of domestic users which is discriminatory.

13. The over 500 million Euro being wasted on meters would be better spent on fixing the MAINS pipes that leak up to 40% of water. Metering is a rouse to introduce charges (double tax) and lay the ground work for privatisation.
14. CER will be aware that government has made no subvention allowance beyond 2015/2016. Irish Water is born with debt and a funding crisis in year 3. As CER is calculating the cost of units and free allowance of this double tax, CER needs to apply the true cost of the double tax to allow for there to be less debt burden in the future. Please set the true economic cost of water and clearly demonstrate that this is currently paid by Irish citizens through central and motor tax and distributed to the local authorities through the rate support grant and local funding.
15. Reports that Irish Water will reduce by half the leaks over 20 years is most alarming. In worst cases that would be from 40 to 20%. While the conservation in metering only expect to save 10% for a short time period. Domestic meters do not detect mains leaks. Mains meters detect mains leaks. Under investment is not the problem, mismanagement is, and by the looks of things mismanagement is set to continue beyond 20 years.
16. In Ireland we flush treated drinking water down the toilet. No programmes of rain water harvesting, no developments in plumbing / dual flush in planning bye laws or building regulations have been introduced since the last successful defeat of water charges in Ireland in 1997. Any claims that the Water Charges being introduced for water conservation purposes are debunked by this glaring omission before during and after the build boom.
17. Finally I hope that CER sees merit in these points and takes the regulation of our water seriously. If Irish Water or CER let for profit greed of market and markets investment at our national natural resource the people of Ireland will be duty bound to rise up and take back what is ours.

Yours

