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Form Information

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Toonumbar Water Users Association

New metering framework submission

We believe The Toonumbar Water System has a number of unique features that make it incompatible with the NSW Government attempt to make a one metering framework fit all users. The current proposal will result in the following for us:

- A) water take records will be unreliable & inaccurate
- B) the meters will be inaccurate and unauditable
- C) data will not be reliably communicated to authorities
- D) there are no high risk users in a low risk system

E) implementation costs will be prohibitive with little benefit

- F) the framework is complex, almost impossible to comply with or even hope to administer. While being able to enforce the framework in its current form is fanciful.

The unique characteristics of the Toonumbar Irrigation system ignored by the current metering framework include;

- A. a water resource with a history of under utilization largely due to the high cost of the water
- B. a subtropical environment with erratic wet & dry periods that mean frequent movement of pumping equipment up and down the creek bank often with water levels rising extremely quickly
- C. steep banks
- D. a continuity moving sand creek bed
- E. poor to non existent mobile reception
- F. long wet periods where equipment is left in storage unused
- G. irrigation water & stock water is often removed with the same equipment
- H. a history of failed metering systems
- I. there are no large water users

The current metering framework imposes another level unnecessary capital cost as well as maintenance and compliance cost that will not be recoverable by the farms using water in the system. The introduction of this framework will further erode the small base of people using the water resource and there by reduce the water users ability to cover the operational cost of Toonumbar Dam.

It is one thing to say the technology is available but proving it is robust enough to operate reliably & cost effectively under our conditions has not occurred. If the Government is truly committed to this current frame work, then a at least 5 trial sites by the Government should be setup along the Toonumbar system to run over the next three years to prove the frame work will work under our varying and very trying conditions.

