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Submission to NSW water reform/metering

Firstly, let me state I have been an irrigation farmer for thirty five years, and have NO PROBLEM with water being metered with an accurate, reliable meter. But, the proposed current legislation, rules and regulations are so impractical, ill-conceived and uneconomical that the Minister and the department should be condemned. In all the department waffle, there is no mention of the actual cost to each farmer. Is it going to be \$3000, \$5000 or \$10000 for each telemetry unit. With thousands of bores and river pumps in northern NSW, there are tens of millions of dollars tied up in technology is that is notoriously unreliable (contrary to what manufacturers might claim), expensive to troubleshoot when there are problems, and generally only used for the summer irrigation season from October to March. So we have to keep maintained for 365 days of the year for something I take batteries out of for most months of the year. And don't forget, we lost 67% (and more in many cases) of our allocation a few years back, so we have less water to amortise these unnecessary costs over.

I digress.

Back to the sham consultation meetings to enlighten us of this ridiculous impost. It is reminiscent of the sham public consultation that mining companies used to deflect criticism of mining on flood plains and over irrigation aquifers. The same divisive techniques with videos playing in the background, little work groups, plenty of noise in the background so no one could hear or concentrate or be properly informed by a public question and answer session. What a time wasting episode, driving an hour and half for a non-event. If that is the best the department can come up with, no wonder we have such pie-in-the-sky legislation where everyone has to be monitored every 15minutes with a ping. A few cameras and it will be as bad as communist China.

The department might be big on ideas but where is the cost benefit analysis to back up the need of having a expensive telemetry system that will last at least fifteen years without failure in 50degree heat with birds, foxes, rodents, lightning strikes and ants all wreaking havoc on temperature sensitive electronic gear. Next, we will have to install air conditioners to keep it working like the telephone and railway companies. Telemetry and dataloggers are unreliable. I talked to local

installers the other day, who have had to change brands many times because of failures. It is one thing to have a talkfest with all the sales people of these companies who will say how good their product is, but no, the farmers have to fund another repair industry to keep all this unnecessary equipment maintained 24 hours a day at the whim of a government department who struggles to keep the same name for more than three years in a row.

What about the department presenting its own data on the reliability of telemetry on its own bore loggers and river gauges? If, it is all so grand, why is the department wanting the farmers to buy back the equipment in the southern region? Why is an experienced Queensland water meter installer that I talked to, so anti telemetry? There is just no long term reliability in them. With all this mandatory rules and regulations that have just been enacted, there first should be a mandatory legislation and code for common sense and practicality for politicians, legislators and department personnel. For at least 10 years, Namoi Water has asked for security tagging of water meters, but no, it was repeatedly rejected by the department. This simple method alone would have prevented the now oppressive impost the department is putting on irrigators. It is not too late to do the simple, common sense approach to security tag meters and validate their accuracy at the same time. Mine was tested by the department 15-20 years ago. They had then gear then, why not use it, instead of creating another parasitic industry. It is about time the department stopped fobbing off their responsibilities onto farmers and did their job properly.

So, the department has employed something like 40 compliance officers. Great, put them to work in validating the existing water meters. I acknowledge that some meters probably don't meet AS4747 standards, but when new technology in water meters are available, the constraints of 10/5 pipe diameters in the standards should not limit the installation of a meter when a manufacturer guarantees the accuracy in a 2/1 or 3/0 pipe diameter situation.

I submit therefore, that the government and department rethink its ill conceived ideas and time lines for telemetry installation, and get back to basics, visiting the farmers, reading the meters and validating them. I have used quality telemetry on irrigators for about 8 years. All it has to do is send a text when the irrigator stops. Simple, right? Its reliability in notifying me is about 70%. I think the unit has now died but to confirm it,

I have to get a service technician out which will cost a few hundred dollars. Multiply that by thousands of telemetry units and data loggers and electronic flow meters and it becomes a technology nightmare.

The department seems clueless as to the vagaries of mobile phone reception and reliability outside of metro areas. It's a fine thing to legislate and put all the onus on the farmer to have everything operating and maintained 24hrs a day 365 days of the year but the department can not seem to keep their part of the deal in reading meters that we pay to get read. Go back to the drawing board and come up with something more practical, reliable and common sense like the KISS method. Keep It Simple, Stupid because technology is NOT reliable.

Yours Sincerely

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