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Are you an individual or representing an organisation?	Organisation
Organisation or Business Details	
Name of Organisation	Irrigation Australia
Who are you representing?	Peak representative organisation
Proposed changes to recording and reporting requirements	
The draft public exhibition regulation includes proposed changes to the recording and reporting mandatory conditions. Do you have any comments on the recording and reporting requirements?	No
Draft public exhibition regulation	
Do you have any other comments on the draft public exhibition regulation?	Yes
	<p>Irrigation Australia is very concerned about the proposal to remove the requirement for a DQP (CMI) to install and maintain a non-urban water meter as we believe that this will result in unnecessary and unfortunate additional costs to irrigators and delays in getting meters validated which will result delays in pumping and irrigation.</p> <p>Certified Meter Installers and Validators (CMI's) have a minimum</p>

of three years of industry experience, have undertaken training in installation of various types of meters and have provided evidence of on-going education by the provision of CPD points. Soon all CMI's will have to pass an on-line exam on entry to the program and at the biennial renewal which will further test their general knowledge of meter installations, data logging, telemetry and government regulations.

Meters and insertion probes are by their nature complicated devices and their accuracy and performance is directly related to correct installation.

CMI's have studied and passed the following competencies over several months to enable them to install, maintain and validate non-urban water meters:

- ☞ NWPIRR014 Install meters for rural water supplies
- ☞ NWPIRR022 Maintain meters for rural water supplies
- ☞ AHCWHS301 Contribute to work health and safety processes
- ☞ NWPGEN003 Apply the environmental and licensing procedures of the water industry
- ☞ NWPNET002 Prepare and restore worksite
- ☞ NWPNET011 Locate, identify and protect utilities

If yes, please provide your comments.

If the proposed amendment was adopted then any person could install a water meter without any experience or training whatsoever. This will lead to installation defects requiring rectification before a meter can be validated.

During many of the practical components of the CMI training courses site visits that are undertaken to do a meter validation Irrigation Australia has evidenced a large number of meters that have not been installed correctly particularly with the 10 & 5 before and after the meter installation. This further emphasises the reality that people need to be trained as CMI'S to ensure that the meters are installed correctly to ensure that they can be validated.

CMI's will still be required to attend all worksites to validate the meters and this additional visit creates a further cost impost on the water meter owner particularly in distant or remote locations. Meters installed by a non-CMI will be unable to be used until seals are applied and validated by CMI's and this could create delays for the water meter owner.

Irrigation Australia is also very concerned about the health and safety risks of untrained personnel undertaking meter installations where heavy lifting, excavation, welding and electrical installations are required. One of the competencies CMI's achieve is 'contribute to work health and safety processes'.