

12 April 2018

Water Renewal Task Force
Department of Industry
GPO Box 5477
Sydney NSW 2001

Submitted via website: www.industry.nsw.gov.au/water-reform/consultation

Re: Consultation Paper: Water take measurement and metering

Irrigation Australia Ltd (IAL) is pleased to provide feedback on the **Consultation Paper: Water take measurement and metering**. Irrigation Australia is a not-for-profit irrigation industry association and registered training organisation (RTO 91313).

Irrigation Australia was founded in 2007, following the merger of ANCID and Irrigation Australia Association. It is Australia's peak national organisation representing the Australian irrigation industry in all sectors from water users, consultants, designers and installers through to educational institutions, government, manufacturers and retailers. IAL is also the Australian representative body of the International Commission on Irrigation and Drainage (ICID) based in New Delhi, India who currently have around 90 countries as members.

Irrigation Australia is primarily involved in irrigation training and certification and has for many years provided competency-based training, e.g. Certificate III in Irrigation and skill-based training e.g. Center Pivot & Lateral Move.

Irrigation Australia operates a certification program licensed from the Irrigation Association in the USA to deliver Certification in the following disciplines:

- Certified Meter Validator
- Certified Irrigation Designer
- Certified Irrigation Agronomist
- Certified Irrigation Contractor
- Certified Irrigation Installer
- Certified Irrigation Manager
- Certified Irrigation Operator
- Certified Irrigation Retailer

These disciplines are certifications not qualifications and are required to be renewed every two years (CID's annually) after the provision of evidence of Continuing Professional Development (CPD). Points are earned for a variety of irrigation-related activities and if not complied with, the certification is revoked.

The other benefit of Irrigation Australia's Certified Meter Validator and Installer Program is that all 301 registered Certified Meter Validator & Installers (CMI) that we have recorded in our system, are communicated with in relation to any changes or notifications with Rural Water Meters, and this can include new Patterned approved meters or any changes to local/state/national government legislation requirements etc. This ensures a consistent message to all the current CMI's.

This is a national program and the consistency enables certified professionals to move from jurisdiction to jurisdiction and remain compliant.

Irrigation Australia also provides competency-based training which are units of competency that define the skills and knowledge to operate effectively and how they need to be applied to perform effectively in a workplace context. These competencies must be approved by the Australian Skills Quality Authority and all RTO's are subject to audit from time-to-time.

The units of competency that apply to meter validation in the Irrigation Australia training program include:

- **NWPIRR014:** Install meters for rural water supplies
- **NWPIR022:** Maintain meters for rural water supplies
- **BSBWHS201A:** Contribute to health and safety of self and others
- **NWPGEN003:** Apply environmental and licensing procedures of the water industry
- **NWPNET002** Prepare and restore work site
- **NWPNET001** Locate, identify and protect utilities

Our Water Meter training covers all Rural Water meters of all sizes, types, brands, patterned meters or not, and includes telemetry for channel meters.

Other RTO's can deliver the above competencies but importantly, only Irrigation Australia can deliver these competencies and provide a Certified Meter Validation Accreditation. Therefore, other jurisdictions, for example QLD Government, insist that all meter validations are undertaken by an IAL approved Certified Meter Validator. In other words, a qualified meter installer can install a water meter but only a Certified Meter Validator can sign off that the meter is installed and operating correctly.

Regarding the Consultation Paper we submit:

1. Irrigation Australia is in general agreement with the scope and direction of the consultation paper and the need to accurately measure water take with meters from regulated rivers, unregulated rivers and groundwater systems.
2. Pattern approval. Irrigation Australia supports the objective of having all water meters pattern approved but raises a concern that if this policy is adopted, many 'in use' water meters will not be compliant, and we recommend a transitional arrangement should be adopted.
3. Irrigation Australia has concerns with the following statement in the Consultation Paper:

Installation and validation: meters must be installed correctly. The NSW Government will develop an installer accreditation and competency framework with which all meter installers will be required to comply. While this is being developed, all meters must be installed or recertified by a Certified Meter Validator which appears on the Irrigation Australia Meter Validator/Installer list (see www.irrigationaustralia.com.au)

Our concerns with this statement include:

- a) We and many of our member organisations are concerned that the provision of an alternative competency program for water meter installation and validation will result in inconsistency in its application and result in industry confusion.
- b) A competency program is a qualification for life and only a certification program can insist on the holders to provide evidence of Continuing Professional Development (CPD), this ensures that holders maintain a level of competency and have kept pace with changing technology and standards.

- c) Many NSW installers in border towns would undertake cross-state installations which would then require them to hold two approved qualifications/certifications and duplicate training and costs.
- d) The point that installed meters require revalidation in an agreed period from installations e.g. every two years is not mentioned in the Consultation Paper.
- e) Water meters, for a number of reasons, can begin to 'over' or 'under' report water usage therefore a revalidation process is required.

Accordingly, Irrigation Australia submits that it has for many years successfully operated a Water Meter Certification Program that has been adopted by other states as the minimum audit standard and we propose that NSW DPI should also adopt this approach.

Irrigation Australia would be pleased to work closely with the NSW DPI to develop the framework for this process however noting the importance of having consistent standards in place across all Australian jurisdictions

Yours sincerely



Bryan Ward
Chief Executive Officer
Irrigation Australia Limited