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Form Information

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Response to Consultation Paper “NSW Water Metering Frame Work Policy, Regulations and Mandatory Conditions” – August 2018 NSW Department of Industry

We are unregulated Coast Irrigators with access licences for both Tidal and Non-Tidal Water Sources within the Richmond/Wilson Catchments.

We fully endorse **accurate** metering and extraction recording of irrigation water which cannot happen in our Water Source until the following regulation conditions are addressed by the Department of Industry – Water.

1. **Catchment mapping errors in our WSP** (Water Sharing Plans) which result in metered extraction of water being allocated to the wrong catchment. DOI has been aware of this for over 12 months.
2. **Farm Dams are not included in our WSPs** nor are they addressed in the draft metering document. Our WSP calls them Unregulated Non Tidal Streams subject to the extraction rules and metering of that source. They are of fixed known volume with nil risk of over extraction as like a rain water tank once used it is empty. A separate category is needed for both licensing and metering.
3. **The outcomes of the ongoing Coastal Harvestable Right Debate** may change the category that farm dams fall into and there by the metering requirements e.g. 10% Coastal Harvestable Right 100% Western Division Harvestable Right.
4. **Surrogate Metering Systems have been allowed by DOI Water.** We run data loggers on our diesel pumps, neighbours use power meters both of which if accurately calibrated can read into the range + - 2%. This is well within the requirements of + - 5% as outlined.
5. **Over Extraction** – Metered extraction from our Non Tidal Source is controlled by a cease to pump at no visible flow in the water source – are these going to be put on telemetry to control metered extraction if so who pays?

Our metered extraction from the tidal source is regulated by the salt water reading at Coraki – read once a week and published in the local newspaper.

Both these cases show that the regulator will have to have costly on ground staff to accurately monitor when pumping should cease.

Our farm dam is inaccurately called a non tidal stream. It can be full and in cease to pump because of its classification as a stream. It was not licensed until after the Water Act 2000 and is of sole benefit to us.

6. **We are not the only licensed water user whose WAL (Water Access Licence) rules** conflict with the Water Sharing Plan rules for this catchment. We have asked DOI Water which rules will apply for metered extraction.

We have fielded these questions to all water authorities. It rests with DOI Water yet Emma Solomon will not answer our questions.

In summary compliance for accurate metering in our system cannot be achieved until the WSP is a true and accurate document.