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**Form Information**

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## Healthy Rivers Dubbo

### Submission

#### Consultation Paper: NSW water metering framework

#### Policy, regulations and mandatory conditions.

### Introduction

As detailed in submissions made to the consultation paper – water take measurement and metering, in April 2018, Healthy Rivers Dubbo supports the case for universal metering, and finds it unacceptable that this draft policy framework does not reflect the ‘no meter, no pump’ policy that is overwhelmingly expected by the public.

### Response to Part 1: Who will need a meter

Healthy Rivers Dubbo supports metering requirements being applicable to works taking water from regulated rivers, unregulated rivers and groundwater systems under a licence where the take can be measured with a meter.

We acknowledge that works solely used to take water under a floodplain harvesting access licence is not required to be metered under this proposed legislation, and that this take will be covered by a separate monitoring and measurement framework. However we feel it is very important to acknowledge that significant volumes of water have been extracted from natural river systems for decades through floodplain harvesting, and that this water has been counted as ‘loses’ under individual water sharing plans. It is important to recognise these large volumes of water have been extracted and used to create profits for industries, and have not gone to the environment.

We strongly disagree that thresholds on infrastructure size should exclude works of less than 100mm from requiring a meter when extracting from surface water, and works of less than 200mm from requiring a meter when extracting from groundwater sources.

Under the threshold model:

- It will be difficult to demonstrate compliance with SDLs set up in Water Resource Plans and that held environmental water is being protected.
- Complexities arising from monitoring compliance in a system where some extractors are exempt from metering would be reflected in the bureaucratic practices of DPI Water, creating an undue financial burden for the tax payer.
- Some irrigators could abuse the log book system, over extract water and make a lot of money from stolen water.

- Several exempt extractors operating in one fragile unregulated river could have a detrimental effect on the rivers healthy, potentially pushing a 'low risk' environmental system to a fragile one.

If the financial burden of installing metering is too onerous for small water extractors, we believe these users should be encouraged to sell their allocation to metered users.

### **Response to Part 2: Standards for metering equipment**

Healthy Rivers Dubbo supports the policy that all new and replacement meters will need to be pattern-approved.

We note that for transitional purposes, this policy allows users with existing meters that are not pattern-approved, but can be shown to be accurate, tamperproof and fitted with a data logger and telemetry be permitted to continue to use these pre fitted meters. We believe there should be a timetable for these users to upgrade their metering equipment to pattern-approved equipment so that industry wide standards can be attained.

We support that all new and replacement meters are to be installed to Australian Standard 4747, must include tamper-evident seals, data loggers and telemetry.

### **Response to Part 3: When will meters need to be installed**

Healthy Rivers Dubbo believes it is important that the top 10% of the largest currently unmetered infrastructures in the Northern Murray-Darling Basin be metered before the commencement of the Basin Plan Water Resource Plans in July 2019.

Apart from this, we support the proposed roll-out dates for meeting metering standards as represented in Table 6 and Attachment F of the consultation paper.

### **Response to Part 4: Other Requirements**

We support the requirements as listed for Water Users with Meters to keep relevant certificates and records as they relate to their equipment and the reasons for water extraction.

We reject that any users, regardless of infrastructure size, be exempt from metering. Therefore requirements for recording take through an online portal on the Minister's web site would be irrelevant.

We strongly disagree that any user should be able to continue to extract water when their metering equipment is not working. If the equipment is broken, extraction must stop completely until the equipment is working properly again.

Healthy Rivers Dubbo agrees that all faulty metering equipment be reported immediately to the Minister.

### **Response to Part 5: Ownership of meters**

Healthy Rivers Dubbo agrees that meters should be privately owned.

### **Response to Part 6: Mandatory Conditions**

Healthy Rivers Dubbo endorses the requirement to install, use and properly maintain metering equipment – however we expect this condition to be extended to all extractors regardless of infrastructure size.

We endorse that the recording of additional information about water take be a mandatory condition of licenced water extraction as detailed clause 241 of the draft regulation.

We do not accept that any licenced extractors should be excluded from metering based on infrastructure size, therefore we do not support that the keeping of records of water take by persons not required to meter is necessary. Log books should have no part of water take measurement and compliance to licence conditions moving forward.

### **Response to Part 7: Review**

Healthy Rivers Dubbo endorses an adaptive approach to water metering in NSW, and the review of this legislation after 5 years.

### **Conclusion**

Healthy Rivers Dubbo welcomes and supports moves to improve monitoring and compliance of water extraction in NSW, however anything less than 100% metering of pumps is below community expectations.

The most important step in good water management is ensuring accurate data collection. It is not acceptable that thresholds are used to exempt some users from metering their water take. Log books should form no part of the metering and compliance framework for water extraction in NSW moving forward. By presenting NSW water metering framework to the public without a universal 'no meter, no pump' policy, the NSW Government has disregarded many of the submissions on this topic during the earlier consultation process.

For more information about this submission please contact:

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