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Are you an individual or representing an organisation?	Organisation
Organisation or Business Details	
Name of Organisation	NSW Farmers Parkes/Forbes Branch
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?	Yes
If yes, please include your comment below and indicate whether it relates to works	B. required to have a meter and data logger but not telemetry - new mandatory condition clause 244A of the regulations
Please provide your comments on the proposed recording and reporting requirements	Government needs to provide clarity on exactly what "approved form and manner" of mandatory reporting is required when there is no telemetry required (surface water pumps under 200mm, and groundwater).
Draft public exhibition regulation	
Do you have any other comments on the draft	Yes

**public exhibition
regulation?**

Apart from the proposed changes, there are a couple of other issues that are causing concern and where the Government doesn't seem to understand that the lack of on-ground clarity is causing problems: the telemetry requirements, and in-situ accuracy testing of existing meters for people who want to retain a non-pattern approved meter.

Telemetry:

The Department has appointed Eagle.io to provide a data acquisition service (DAS) to collect the usage data from irrigators. However, the Government has not yet published a list of the telemetry devices that are approved to connect to the DAS, which is very late notice considering people with large pumps need to comply by 1 December. Also, some irrigators already have on-farm telemetry systems to help manage their water storages and water management, and it's not clear whether these systems will be endorsed to connect to the DAS. Unless a list of approved telemetry devices can be published by Government very quickly, it would make sense to defer the telemetry requirements to December 2020 – irrigators would still be required to have data loggers which would retain data which could then be downloaded by approved persons. This would simply mean they don't have to install as yet undefined telemetry systems to connect to the DAS.

In-situ accuracy testing of non-pattern approved meters installed pre April 2019:

Unless a manufacturer's certificate of accuracy to within +/- 2.5% is available for a non-pattern approved meter, it must have an operational test in-situ and be accurate to within +/- 5%. However, given the drought conditions and lack of water in many systems there may not be enough water to actually carry out an in-situ accuracy test. Also DQPs may be reluctant to do the tests unless they have clear guidelines from Government on acceptable methods for doing the accuracy testing. We understand Irrigation Australia Ltd is providing input to Government on how this may be done, but that it still hasn't been finalised. Again, this is very late in the day for providing advice on something that needs to be done by 1 December.

**If yes, please provide
your comments.**