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Type of submission: I am making a personal submission  
Do you want your name published?: Yes  
Privacy statement: I agree to the above statement

**Your submission**

Enter text below or upload a document:

File upload: Water-Metering-Jim-Cush.pdf, type application/pdf, 131.6 KB

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**Form Information**

Site Name NSW Department of Industry  
Site Id 47409  
Page Standard Name NSW Government's Water Reform Action Plan  
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28/9/2018

Attn: NSW Department of Industry – Lands & Water

## **RE: Water take measurement and metering – consultation paper**

Pechelba Pty Ltd operates irrigation farms in Border Rivers, Gwydir Valley & Namoi Valley. We predominately grow cotton on all our properties. I am involved with Border Rivers Food & Fibre and Gwydir Valley Irrigators Association and an observer of Namoi Water.

I would like to make the following statements in regards to the consultation paper:

- As irrigators we require full metering and compliance systems to protect our land rights and believe all river water should be metered.
- We have been paying full metering charges for the last 30 years and the system has failed us hence the media coverage and scrutiny in the past 15 months.
- Mace meters have become the industry standard. We have faith in our installations and validations by licensed irrigation specialists.
- The Moomin Creek is checked with in-stream gauge stations above and below the location of our property, thus, our water take is verified by those gauges as well. Further to this, we have not had any issues with the river operations officers in the pumping of our ordered water.
- As we have Mace meters installed on four farms, in 2 states and 4 river valleys, we desperately need the Department to help address the pattern approval process for Mace meters.
- QLD Department of Natural Resources, Mines & Environment administer water in the Murray Darling Basin and their approach is to allow Mace time to get approvals in place. It is pointless to try and reinvent the wheel and add major infrastructure costs to replace meters when they are performing adequately.

- We have several inlet diversion pipes in excess of 1200mm, and as it stands, if we have a failure after the 1<sup>st</sup> December 2018, we do not have a meter we can replace it with. This is a major bureaucratic mess that requires prompt action to address. If Mace fail to get their pattern approval and meet the AS 4747, we require more time for this to occur and the date set at 1<sup>st</sup> December 2018 needs to reflect this and be pushed out to accommodate for this to occur.

**Consultation questions:**

1. Is it easy for you to determine whether your work(s) meet the threshold? If not, why not
  - Yes
2. Which option for multiple works is preferred, and why? a. Should meters be required where there is more than one work (where at least one is below the threshold)? or b. Should meters only be required if the cumulative capacity of the works is equivalent to the infrastructure size thresholds?
  - This is not applicable to our operations.
3. Are there any other types of water take that should be exempt from the metering requirements and why?
  - Yes, Floodplain harvested water. We agree with the proposal in the healthy floodplains program to measure water in on farm water storages.
4. Are there any barriers to implementing the proposed metering standards that should be considered?
  - Yes, Mace is inadvertently the industry standard in Northern NSW and irrigators who have purchased this companies' meters in good faith and expense deserve the opportunity for the government & the metering company to sort out their requirements to meet government expectations.
  - Licensed installers & validators are already booked out into the future with a 6-8 week job completion wait-time, meaning the proposed deadline may not be met.
  - We believe that each valley requires a full audit of metering.
5. What additional information should be included in the data logging and telemetry protocol?
  - I believe telemetry is the way into the future.
  - iWAS should be the point of entry for the telemetry with the point being when we order water, it has to be in account. iWAS should know the status of the account with the telemetry.

- The only information required is when the pump is pumping and how much it is pumping.
  - There will be interstate issues on metering and water transfers with water being pumped through the same site on the NSW/QLD Border. We could have water coming from a QLD water account (owned by the same irrigator) being pumped in NSW which will not be recorded through iWAS correctly. Interstate transfers need to occur through iWAS.
6. Should telemetry be installed by a duly qualified person? What qualifications should the person have? What other options should be considered?
- Yes, they should be by a professionally qualified installer.
7. What methods could be used to demonstrate the accuracy of existing meters in the field? Is guidance needed on the methods that can be used?
- Yes, it should be verified by a secondary meter by the validator. The validator has to be happy with the validation or he won't validate the installation.
  - How much water take is reasonable for the testing of a meter in the validation process? The validation process is obviously going to have to use water to test, and there may not be water in the water holders account to test. The water holder should not be penalized for this and any reading that occurs during the validation testing process. For instance, any negative account is a big red flag against our company.
8. What factors need to be considered and what safeguards need to be in place for the proposed transfer of government-owned meters to private ownership? What needs to happen before the transfer can occur?
- Transfer of ownership for government owned meters should not occur until meters are upgraded to the new standards.
9. What information and support will water users need to help select metering products and services that meet the required standards? Would you be comfortable with a third-party meter provider being responsible for the meter?
- I think we need to have choice of meters. It would be against ACCC principles to only have access to one meter.
  - As it stands today, there is no meter to replace diversion inlet pipes over 1200mm.
  - Yes, we would be comfortable for a third-party meter provider if it was an economical proposition.
10. Do you have any comments on any of the proposed mandatory conditions?

- We need to have a simple but robust procedure in place for when a meter fails. I believe it requires immediate contact of the river operator to notify them and continue pumping under any conditions that they put forward.

11. What issues and data should be considered in the five-year review to assess the performance of the metering framework against its objectives?

- Are compliance measures being met in an achievable and cost-effective manner?