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Type of submission: I am submitting my organisation's submission
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Your submission

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Draft submission on NSW water reforms At a well attended meeting of the Mole & Sovereign Water Users Association Inc. on 10th September it was decided to make a submission on the NSW Water Metering Framework consultation paper. The main concerns are as follows. 1. Most irrigators on unregulated streams are small opportune irrigators using irrigation to complement their grazing enterprise by growing fodder crops for grazing or storing as hay, with some surplus hay sold. This does not generate much extra income but is their only way of drought proofing their property. 2. The 100mm or above threshold for requiring a meter appears straight forward, however the meeting revealed many flaws in this approach. Works approvals reflect the past history and do not reflect the actual situation on the ground at present. It became apparent that several of the larger, although still small irrigators in the overall scheme of things, would be exempt from installing meters and most of the micro irrigators would require meters. In our river, the current annual take is around 20% of the total allocation. 3. The Mole River has not run for 8 months and there has been no irrigation in this period. Like most of the unregulated rivers on the western slopes, there are frequent periods where our access rules do not allow us to pump, therefore it will no longer support traditional irrigated crops such as horticulture. Opportune pumping cannot justify the cost of installing a meter. 4. Any meters required to be installed must be guaranteed flood and insect proof. 5. No one should be disadvantaged by their location. If telemetry is required and there is no mobile cover, any additional costs, capital and ongoing maintenance, should be subsidised. 6. We understand that large flood lift pumps moving large amounts of water need a meter with a high degree of accuracy, but we feel that if small pumps are fitted with less accurate meters the small amount of water not captured or recorded would be insignificant. In conclusion: There is insufficient information on the amount of water taken by small licence holders from small unregulated water sources, either individually or collectively. It is therefore impossible to establish whether a water source is at risk and what level of individual extraction proposes a risk. It is not financially viable for small irrigators to install meters The current state wide drought has put small irrigators under financial stress and it will take at least 3 to 5 years to recover from this. We therefore request the implementation of the metering roll out be postponed in unregulated water sources with a total water allocation of under 10,000 unit shares, until the 5 year review. During this period, all water users would be required to make and submit all records through the proposed online portal. Anyone not complying with this would be required to install a meter immediately. The information gathered over the 5 years would help to identify at risk streams and what level of extraction is acceptable without metering and whether a cheaper less accurate meter would be acceptable. It is to be hoped in 5 years time we will have sufficiently recovered from the drought to be able to afford to install meters if we haven't been able to convince you it is not sensible.

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