Water Measurement and Metering

Preamble

..... wishes to raise the issue of the mostly recent trend of "water use" by irrigators being referred to by government agencies as "water take."

"Take" is defined by the Oxford dictionary as to "lay hold of with the hand……or with any instrument, grasp, seize, capture, catch by pursuit or surprise, captivate, win, gain…"

None of this describes the legal diversion and use of water, to which they hold a water access license, by well-meaning and compliant irrigators.

The referral to "take" by NSW government departments is offensive and erroneous and should be discontinued.

1. When should a meter be required?

All water use should be "measured."

"No meter. No pump" is impractical. "No measurement, no pump" is workable.

Why?

- There are no viable patterned meter options for large diameter water meters, in the sizes required by larger irrigation operations in the North of the State. The meters that are pattern approved are expensive and generally unavailable for sale or service.
- To further meet AS4747, how can irrigators comply with a standard if no approved meters are practically available that meet the standard?
- Diversions for water use are not always by means of a pump. If open channel diversions are to be metered than approved meters for such a purpose need to be available.
- In line with "All water use should be "measured," environmental water use should be included in the measurement regime to the same standards as irrigation water use.
- ..... has outlaid significant funds equipping its operations with the most practical and up to date meters available, Mace Series 3. These meters are not pattern approved and operate on "manufacturer's standards."

  They are reasonably reliable but they still break down from time to time. Accessing the expertise and resources to repair the meters takes time, effort and expense. To be excluded from pumping while legitimate breakdowns are being repaired is unjust and could result in substantial financial loss.

- The current management of metering compliance in NSW can be improved. Water meters in the Lower Namoi regulated stream, have for years, despite repeated requests from water users, been left in a state where no security wires have been attached. By contrast, similar meters on the Gwydir regulated stream have had security wires in place.
- The NSW metering project is in disarray. A key point of contention with some irrigators is the booking of "water savings" by the NSW Government for so called "water saved" and then sold to the Commonwealth by the project. This is seen as dodgy accounting at best. If the metering project had been implemented properly and at a high standard, real time meters would already be in place.

A focus on outcomes rather than unachievable Australian standards would go a long way in achieving most water use being metered.

Option 1 appears best. In terms of Options 2 and 3, it would be sensible to prioritise a meter compliance schedule by the quantum of water share component, while working towards "no measurement, no pump."

By way of additional comment;

Option 2

- Metering thresholds based on various shares for various water sources and location make little sense. For example, the thresholds proposed for a 75% capture would appear to have an unregulated user who might access 370 megalitres once every couple of years in the same category as a high security inland regulated user accessing 5800 megalitres every water year. Hardly sensible.
- Cliff face thresholds can also be problematic with such an approach; the inland regulated water user of 5900 shares would be metered, the user of 5750 shares in the same stream not?
- Complicated and impractical.

Option 3

- This approach is too complex and not made for the future. Impractical.

Option 4

- Water source categorisation based on "risk" is judgmental, not applicable across all geographies and open to interpretation. Impractical.

2. What type of metering equipment and reporting should be required?

The future metering requirements proposed on Page 11 of the document are acceptable provided;

- Affordable meters are available in the market place to meet AS4747
- The pattern approval process for meters is progressed so that it is affordable and deliverable. Those setting the standard should be responsible for such conditions.

- Meter installer accreditation is already available within the industry. The government needs to build on this not reinvent the wheel. There are currently few qualified installers of large diameter metering equipment.
- Agree all meters should be sealed.
- Five (5) year maintenance cycle acceptable, provided sufficient qualified installers are available to fulfil this requirement.
- Telemetry. Achievability is constrained by the low standards of data transmission capability in many remote locations. Otherwise acceptable provided the capital costs of providing the data network and the hardware, and the software and ongoing maintenance is paid for by the entity requiring the information, the NSW Government. Water users must also be able to access their own data.

Self-reporting phased out.

Comments;

- Self-reporting remains a sensible measurement option for flood plain harvesting and meter not working situations
- If self-reporting is not permitted, pray tell them how an irrigator located between Come by Chance and Walgett can remain compliant and not lose his crop to heat stress at Christmas time, in the height of Summer, when his meter breaks down, the qualified installer from 120 kilometres away doesn't come back to work before the end of January, his mobile phone has no reception and the NBN doesn't work?

3. How should the metering requirements be rolled out?

Roll the metering requirement out by Valley, prioritised in some order of "best bang for buck."

Do not try and pick winners and losers based on location.

Manage the program properly and impartially. No one wants another "pink bats" scheme.

An emphasis on 4 Corners in the written metering paper, page 15, is disappointing. This should be about achieving outcomes not pandering to the ABC's view of life. If the current metering standards, for which irrigators already pay designated fees, were properly carried out by the NSW government, the industry would not find itself in this situation.

4. Who should own the meters?

Apply these simple principles;

- Whoever requires the meter pays for the meter.
- Whoever pays for the meter owns the meter.

If the NSW Government require different meters than those ..... has already installed at its own substantial cost, then the NSW Government should pay.