Your details

Title:	Mr
First name:	Jim
Last name:	Spain
Email:	jspain@irritek.com.au
Organisation (if relevant):	Irritek Pty Ltd
Position in organisation:	Director
Address:	744 Carnarvon Hwy
Suburb:	Moree
Postcode:	2400
Type of submission:	I am submitting my organisation's submission
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Submission to the NSW Department of Industry by Jim Spain on behalf of Irritek Pty Ltd

30 September 2018

Subject:
NSW water metering framework, policy, regulations and mandatory conditions
Water Management (General) Amendment (Metering) regulation 2018
Water Management Act 2000 and the Water Management Amendment Act

Introduction:
Irritek Pty Ltd (Irritek) is a family business based in Moree NSW, which designs, manufactures, sells and installs large-scale irrigation infrastructure. Irritek has been operating since March 1995 and has sold, serviced, installed and validated water meters since. Customers of Irritek are situated in the Gwydir, Namoi, Barwon, Darling, and Murrumbidgee irrigation areas of NSW and the broadacre irrigation areas on Queensland. I am the Managing Director of Irritek, and have previously been a member of the AS4747 Standards Committee and have advised and supplied numerous irrigators with water meter infrastructure to comply with the applicable regulatory requirements since 1995.
As a general observation of this process, it is unfortunate that a longer period for written submissions on the final draft was not provided. Indeed the 27 August – 30 September 2018 timeframe is in itself a barrier to stakeholder engagement. As the Interim Metering framework has been in place for approximately 8 years with little progress on the final framework, the speed of the final regulatory framework has been an impediment to wide and considered engagement by Irritek. Further in making this submission, Irritek seeks to highlight the particular problems and barriers to compliance for works involving closed conduits larger than 600mm and that the proposed framework and implementation timetable should be amended to accommodate these.

Problems and Barriers for Compliance for Works Exceeding 600mm:

1. Requirement for pattern approved meters
   This requirement is onerous and expensive for water users of works exceeding 600mm. The Seimens Model MAG8000 is currently, the only listed pattern approved meter catering for waters users with works >DN600 and is limited to DN1200. This model is at least 4 times more expensive than comparable meters currently being supplied by Irritek and other suppliers that generally conform to AS4747 albeit without pattern approval. Most of Irritek's metering work involves pipework DN750 and above with a large amount of structures exceeding DN1200. It is Irritek's experience over many years that MACE ultrasonic transit time meters provide value for cost, easy to use, install and maintain and are well established in the market place.
   The implementation of the new Metering framework will mandate the use of only one product ie: the Seimens Model, which denies water users diversity of choice whilst enforcing the use of an expensive option. This is unfortunate in a period or severe and

IRRITEK Pty Ltd ABN 80 672 010 313
Ph: 1300 IRRITEK (1300 477 483) Fax 1300 363 015
744 Carnarvon Hwy (PO Box 349) Moree NSW 2400
email: administration@irritek.com.au www.irritek.com.au

prolonged drought and impacts the financial sustainability of law abiding responsible irrigators.

Irritek notes that the NSW Government funded Manly Hydraulics Laboratory to seek accreditation for testing larger non-urban water meters. Irritek understands that this was only done this year and that the testing and pattern approval process is a very long process. It is unlikely that other meters will receive pattern approval before the December 2018 implementation date. Moreover, due to the relatively small market for >DN600 meters it is unlikely that many overseas manufactures will seek pattern approval and incur substantial cost in Australia for this size.

Irritek submits that the NSW Government should extend the interim standards metering requirements for works greater than 600mm until 2021 to allow time for pattern approvals of other meters to give water users diversity of product choice and cost.

Alternatively the NSW Government could allow only those meters compliant with the ISO Standards be utilised during this interim period. If by 2021 there remains only 1 pattern approved water meter for >DN600, the ISO standards exception could be extended for a further period.

2. Shortage of Skilled Contractors and Validators

   The implementation of the new Metering Framework will create a new regulatory regime with significant consequences for non- compliance. Infrastructure compliance and validation will require contractors such as Irritek to advise, design, manufacture and install water meters and equipment. There are not many contractors with this experience and expertise for works >DN600 and Irritek predicts that it will be unable to meet the demand of the work required by its customers. Irritek is training another employee to undertake the water meter validation course. However, the complexity of both the water meter and site-specific installation requirements coupled with the new regulatory regime, necessitates that the contractor is not only qualified but also is also well experienced in this type of work. Alternatively, the contractor and /or the irrigator will deliver non-compliant outcomes. It would be counter productive to the objects of the new metering framework, if compliance could not be achieved due to a shortage of experienced contractors in this area and to potential unnecessary expense if non-experienced contractors are used with unsatisfactory results.

3. Process for achieving Compliance of Metering Structures

   3.1 Over the years I have had many calls from different public servants tasked with formulating policy for metering and the common line of enquiry has been ‘how much does it cost to install a MACE meter?’ This is pretty much ‘How long is a piece of string?’ question. The cost of installing a meter is dependent upon the specific site conditions. It can vary from a simple 2 or 3 hour job to a project cost in excess of $100,000. To achieve the regulatory objectives of accurate measurement of water flow, each water meter site must be customised to specific site conditions. Different site characteristics have dramatic impacts on water meter compliance.

   3.2 The proposed metering framework does not provide for an application and approval process for metering structures other than to say meters must be installed to the

standards. Irritek's suggested position based on years of experience, is that each site requiring a meter should be drawn on a plan and certified as compliant by the Department of Industry BEFORE any works are carried out. This process should be undertaken by the licence holder and/or its contractors and submitted to the Department for approval. Once approved, the licence holder then can have the works carried out and when complete the validation certification can include that the works meet the design plans. In the absence of this process and in the absence of experienced contractors carrying out the works, the licence holder will have no certainty of compliance until the final approval and after significant costs. Moreover, if plans are approved prior to works being carried out the licence holder may be able to undertake the works itself for a more cost effective outcome.

3.3 The draft Metering framework does not include a standard form for validation which will lead to different interpretations of validation compliance and possible increased costs and lost pumping time to the licence holder. The Queensland Government metering framework includes a Validation Certificate which must be completed by the Validator giving both certainty of content to the validator and the Departmental officer assessing the compliance.

Summary

Irritek respectfully submits that the NSW Metering Framework, Policies and Regulations should be amended to address the issues raised above. If those issues are not addressed, there is potential unnecessary cost to licence holders for >DN600mm works, uncertain outcomes for compliance of water meter installations and potential lost productivity due to contractors and validator shortages. In the absence of a clear meter installation works approval process and validation form, there is potential for delays in compliance. This is contrary to the intention of the Framework.

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Ph: 1300 IRRITEK (1300 477 483) Fax 1300 363 015
744 Carnarvon Hwy (PO Box 349) Moree NSW 2400
email: administration@irritek.com.au www.irritek.com.au