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To whom it may concern, In opening I acknowledge public/government desire for a system of monitoring irrigation water take. This submission is to highlight the effect of the proposed regulatory change will have on a small unregulated user such as myself. Background I have a 427 meg unregulated license with a dual frontage to Tenterfield Creek and Dumaresq River. My works entitle me to four 100 mm pumps, two on each source. In reality I have one 65mm pump on the Dumaresq only. I am currently required to keep a log of pump hours. I irrigate approximately 15 hectares of lucerne and 35 hectares of improved pasture for stock and fodder crops. I would estimate my actual use at no more than 300 meg annually. I would be considered one of the larger unregulated users in the area. I intend to put a second pump on the Dumaresq not to increase water take but to make irrigation more timely. I may put a third pump on Tenterfield Creek at some future stage but it is a poor source with long periods of little or no surface flow so it would be opportunity irrigation of improved pastures only. Issues I Envisage - I would likely be required to install two to three meters, costing approximately \$6000 per meter (100 mm with telemetry installed). Obviously this is a large expense given the size of my operation. - I know of no-one in this area who has actual pumps that correspond with their works license, so using this as a base for future legislation is in no way a representation of reality. - Surely if it is an unregulated license with no trading (generally the case so megs do not vary) the better measure of license size would be megs not works size. This would also solve the issue of multiple pump sites needing meters when total volume pumped is low. - Given ordering water on unregulated systems is impossible I assume the idea of telemetry is to ensure no pumping occurs when cease to pump orders are in place. The problem being that on the local unregulated licenses, pump condition is visible surface flow in and out of individual pump holes. As visible surface flow varies from hole to hole and there is no system of monitoring individual holes, surely telemetry on unregulated licenses such as mine is unnecessary as meter total flow readings could simply be communicated by user logging on and imputing the total at a given interval. - As all pump sites here are on riverbanks of fast flowing rivers in times of floods, any meters installed would need to be as robust as possible, ie. simply waterproof in still water would likely not survive in flood conditions, incurring more costs for replacements. Suggestions/Conclusion - Unregulated license under 500 megs should need no meters (same as 100 mm works rule) no matter how many pumps, but still be required to keep a log of pumping hours in some form. - Or if you insist on meters for multiple pumps then a cheaper option. Telemetry seems unnecessary, even possibly mechanical meters (more likely to survive flooding), self installed (as per manufacturer's specs), with readings reported online by user at regular intervals.

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**Form Information**

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Page Standard Id	134654
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