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27th September 2018

Dear Sir,

SUBMISSION - NSW Water Metering Framework Regulation

The consultation process undertaken by the Water Taskforce Reform Team in the Namoi was unsatisfactory - again it did not meet licence holder expectations of public meeting format including question and answer sessions to enable a full understanding of the implications of the proposed reform. We request that all future meetings in the Namoi are public meeting format with facilitated question and answer session.

The infrastructure thresholds selected (100mm SW/ 200mm GW) when combined with Schedule 9 in the regulation results in all approvals/take being required to install a new meter or upgrade an existing meter in the Upper and Lower Namoi. The rollout therefore means every meter in Namoi (except Unreg take under 100mm) will be required to have a compliant meter by 2020. The rollout dates are impractical and are impossible to meet in the timeframes proposed with current resource capacity and meter supply.

Key Point 1 : The infrastructure thresholds: the water sources in Schedule 9 and the implementation timeframe need to change from the draft regulation proposed.

Key Point 2 : We/I request the Upper and Lower Namoi Alluvial Groundwater sources and Manilla, Quipolly and Quirindi Groundwater sources are removed from schedule 9.

Key Point 3 : The infrastructure size thresholds should apply to the Upper and Lower Namoi Alluvial Groundwater, Manilla, Quipolly and Quirindi Water Sources.

Key Point 4 : Groundwater works in the Namoi already have meters in place and it is recommended the department can maintain community confidence in the integrity of the existing metering process if the regulation includes a requirement all meters are sealed with a lead seal in the interim period.

Key point 5 : A longer rollout timeframe is required to allow water licence holders to meet the new metering requirements in a more appropriate and practical timeframe that matches the current resources and capacity.

Key Point 6 : There should not be a cumulative threshold based on linked works/entitlement or landholding. The threshold should be implemented at an individual work approval level in the interim period until the 5 year review.

Water users support the need for accurate metering, however smaller entitlement holders and those with multiple works on landholdings will be subject to significant costs to upgrade existing meters for minimal change in outcomes compared with meter sealing.

There are approximately 2100 meters in the Namoi Valley and there is only 1 accredited meter installer. The majority of the meters on the attachment E are unable to be supplied without substantial delay in supply.



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The supply of existing meters is taking 6-12 weeks and longer. The timeframes set within the new regulation propose a staggered rollout that is not implementable with the current resourcing. The staggered rollout needs to be reconsidered

It is requested the timeframes for implementation be revisited - based on an individual work approval exceeding the threshold in the interim.

Proposed staggered approach below should be considered a more appropriate option to implement new metering requirements.

Surface Water above 500 mm - 2019 (Regulated Rivers Only)
Surface Water above 500 mm - 2020 (Unregulated Rivers Inland)
Surface Water above 100 mm - 2021 (Regulated Rivers)
Surface water above 100 mm - 2022 (Unregulated Rivers Inland)
Groundwater above 200 mm - 2024 (Inland)

Small Water Supply Works should only be considered after the first 5 year review.

We request the department provide the economic analysis undertaken of the options - there are 2100 meters in the Namoi with an average replacement cost of \$20 000 it means over \$42 million dollars would need to be spent in order to comply with the new regulation while simultaneously reducing the ability to reliably pump.

Irrigators are now paying for the reduction in resources to the previous compliance regime, which when implemented as a whole and as requested by licence holders prevented any potential misuse of the resource. Lead Sealing of all meters and a process requiring resealing meters if a meter is repaired is a more practical option in the interim period of the rollout whilst the manufacturing and accredited meter installers are improved..

In summary We do not support the use of cumulative work or landholding for the threshold limits and request the Namoi water sources are removed from schedule 9. The current rollout is impractical and is unable to be implemented. There is serious risk that Government is again putting the industry in jeopardy in not understanding the implications of the limits and capacity to implement the new metering standards.

Yours sincerely,

Mike Carberry
Partner