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Do you want your name published?: Yes
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Your submission

Enter text below or upload a document: General Comments MRFF welcomes the opportunity to provide a submission on the NSW Draft Metering Regulations. MRFF acknowledges the progress Department of Industry have made in recent months. As the peak industry body in the Macquarie Valley, MRFF is committed to robust accounting and measurement reform as a proactive measure to protect all water rights. MRFF continue to question whether the true 'purpose' of the metering reform has been clearly identified and communicated to stakeholders. While DoI have stressed metering reform is a 'compliance' strategy, application and future benefits of metering with regard to river operations and customer service have been largely ignored. MRFF contend that real benefits to customers and the general public will only be achieved under an integrated and strategic reform of the licencing and accounting systems. DoI / NRAR /WaterNSW will have need to manage public expectations regarding the flow on benefits of telemetering metering information. Recommendations: • Recommend that the minimum threshold provisions be clearly and widely communicated so that those who have installed a smaller pump than allowed under their works approval are aware that they may be required to install a pattern approved meter, and they have the option to amend their works approval if they wish. • MRFF does not support that all multiple works should require compliant meters regardless of capacity. This is particularly the case for groundwater works. The provision has the potential to capture many smaller operators who run multiple works due to the conditions of the aquifer. We believe that risk is mitigated in the works approvals themselves (in terms of bore-casing diameter and permitted pump infrastructure). • MRFF seek further clarification regarding the term "at-risk groundwater source". Given the vagaries of the term, MRFF propose at risk to mean: o Has a rolling 5 year history of extraction greater than 70% of the WSP LTAAEL, and o It is over-allocated, or o The entitlement and account rules combined can result in extraction exceeding the LTAAEL • Recommend that a 'live' / maintained list of Pattern Approved meters be formed and effectively communicated • Recommend the NSW Government establish clear protocols allowing individuals to decommission works approval sites that do not have licensed water attached or do not have a history (greater than five-years) of accessing allocation, to be decommissioned via inspection, so that the works approvals remain valid but that they are excluded from metering requirements for the term of the certificate (period of up to five years). • MRFF supports the revised policy to allow existing meters which are not pattern approved to be retained subject to either the approved validation procedure or the accuracy verification. We recommend that the information on the validation and verification procedure be provided in plain English and be widely available, so that both installers and irrigators are clear on the required procedures. • MRFF contends that technical solutions exist that are cost effective and accurate to allow existing meters to be verified on-site(e.g. Panametrics ultrasonic transit time unit that could be clamped on to the pipe). MRFF accepts that any verification device will require verification of itself. • We support the principles for the data and telemetry protocol outlined in the consultation paper, and recommend that industry should be involved in developing the detail of the protocol to ensure the requirements are fit for purpose and cost effective. • MRFF questions the benefit and cost-effectiveness of requiring telemetry in low risk situations, ie, smaller users who account for less than 20% of water

take in that water source, and groundwater bores where there is limited impact on other users or on the aquifer. In the situation where a groundwater user has installed a number of bores to spread impact, the requirement for every work to have telemetry would be extremely costly, particularly in the groundwater sources currently defined as 'at risk'. A requirement to install telemetry should be able to clearly demonstrate that the data will add value to water resource planning and management. • Recommend that the regulations be amended to provide an allowance for the installation of ISO12242:2012 standard meters when there is not either an AS4747 pattern approved meter or a choice of AS4747 meters available to install. • Recommend the NSW Government align the requirement to replace existing meters or install pattern approved meters only, with the first implementation deadline of 1 December 2019. • Recommend that timeframes for non-priority water users above the minimum thresholds are extended by at least one-year and that options to retrospectively install tamper proof seals to extend the life-cycle of these meters whilst providing community confidence. • Recommend that telemetry conditions are staged on a separate timeframe to metering regulations on a valley-by-valley approach to ensure that the information value adds to water management and new technology options can be explored. (I am considering having this for the greater than 500mm sites only as a priority but not sure I need to be that specific). • Recommend that telemetry does not need to be installed by a duly qualified person. • Recommend that a practical tiered notification / compliance standard be developed and communicated. Under the existing 911 instrument, there is only provision for faulty metering equipment. Given data is to be communicated daily we strongly believe a more realistic and nuanced provision is required. Such as, in the absence of an 911 order: o No data for 3 days – Notice o No data for 14 days – warning o No data for 28 days – Penalty o Where works are required, standard 911 procedure applies • There are serious concerns of the number of pattern approved meters and availability of metering equipment. With that said, some of the proposed roll out dates are optimistic at best. We propose the following alternatives: o Surface Water above 500 mm - 2019 (Regulated Rivers Only) o Surface Water above 500 mm - 2020 (Unregulated Rivers Inland) o Surface Water above 100 mm - 2021 (Regulated Rivers) o Surface water above 100 mm - 2022 (Unregulated Rivers Inland) o Groundwater above 200 mm - 2024 (Inland)

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Form Information

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