

# Problems with Water NSW metering policy and regulation so far

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We are all for improving the regulation of water take in NSW but....

## Consultation

1. I can't actually make a submission to the proposed policy draft plan. It requires ticking a box to say I have read and accept their privacy policy before submitting the online form. I don't accept their privacy policy as it is difficult to find on the website. I would have thought a link to the policy placed next to the checkbox would be appropriate, that way people could be sure of what they are agreeing to.
2. Poor notification of consultation sessions and consultation period. No attempt to notify affected license holders directly has been made. License holders are entitled to know that NSW water is altering the conditions of their licenses and should be consulted about that process. Surely DPI water has access to a contact list for its client license holders that could be utilised. My license fee bill always seems to find me. It is arrogant to think that implementing change on this scale will happen effectively without proper consultation and result in an effective and workable outcome. I would not have known about either consultation process except for a chance word of mouth encounter.
3. The "information booth" type of consultation adopted by Water NSW is not an efficient or effective way of informing License holders of how they will be affected by these changes. Nor is it the best way of receiving feedback and starting a two way dialogue to work through the inevitable hurdles that a change of this magnitude will involve. I appreciate the desire to have multiple consultation paths but public forums in a face to face setting are highly valuable methods of communicating issues widely and beginning the problem solving process. They should be an integral part of stakeholder consultation. They should be well advertised as well as communicated directly to license holders.
4. Time frame. Your 1 month consultation period and commencement date of 1<sup>st</sup> of December 2018 don't allow enough time to address many of the issues I expect to be raised. Particularly in light of the problems in points 1,2 and 3. Once again I would expect that the practical issues would require problem solving and communication between DPI water and **all** stake holders, and involve trying to facilitate a constructive back and forth dialogue. Not allowing an appropriate time frame for this to take place seems like not intending to meaningfully engage in consultation. This shows a foolhardy level of arrogance which could cause extreme financial loss to previously compliant water users.

## Practical implementation issues

1. Some entire pump stations physically cannot meet the new standards for meter installation. The number of straight uninterrupted pipe diameters required for compliant meter installation may not exist in previously compliant pump installations. This could effectively mean that for some license holders over 500mm in size, an entire new pump station is required before December 2019 to be compliant. Is the intention of the reform plan to cause this sort of financial burden on producers, particularly at a time when unregulated users in many cases have had little or no income from these assets over the current drought period. If so will there be any compensation for this financial burden placed on previously compliant water users. Expect >\$100,000AUD for each new 500mm pump station.
2. The verification process for existing meters is unclear, how would the problems above be overcome cost effectively in the verification process. Once again it seems that it could be that an entire new pump station is required because of not being able to verify a pre-existing meter. I doubt that new pump stations could be supplied in this time frame. At the very least a costly exercise, I assume paid for by the license holder.
3. Limited availability of meter types, particularly in larger size ranges. This will result in anti-competitive behaviour by meter suppliers, further disadvantaging license holders who are forced to purchase. A wider selection of approved meters would be preferable as well as more flexible conditions for installation. I suspect availability could be an issue within the current time frame. Why does NSW need to develop its own standard for meters? Surely there is a more widely accepted standard that would suffice, and mean greater availability of meters
4. Telemetry. Who owns it? Is there a standard? How can we be signing up for this without knowing the cost or specifications? Will there be a reduction in our license fees to cover the cost, as it will reduce the need for meter reading, which in many cases has not been happening anyway? Our fees have been increasing for years while our level of service has been declining.
5. Most electronic flow meters effectively have to be tampered with to change the battery. Am I allowed to change the battery? If I arrive at my unreg pump site on one of my approx. 5 average annual days of pumping to find a flat battery, am I expected to forego my opportunity to pump and miss 20% per day of my likely annual water from that asset because I am not allowed to change the battery? That's if I can get a battery from the supplier! Sometimes these pumps sit idle for years in drought time and have to be ready to go at short notice when a cloudburst occurs.

In summary my concerns are that this process could cost my business a lot of money in order to comply, while simultaneously reducing my ability to reliably pump when I need to. Possibly spending over \$100,000 to end up with a system which I expect will reduce my pumping reliability and therefore reduce the value of my assets is a big ask for a small farm. Seems like irrigators are being made to fund the governments lack of investment in compliance and be the guinea pigs until the time and effort required to come up with a workable system is invested. A kneejerk reaction to a sensationalist piece of journalism. Many of these pumps were installed with encouragement from the government at the time to droughtproof. Where is the leadership?