

Firstly, we would like to thank the NSW Government for the opportunity to comment on the consultation papers. We are also appreciative of the opportunity to discuss the papers at the regional consultation meetings. We commend the staff that attended the consultations for their depth of knowledge of the papers and for their willingness to understand some of the practical limitations connected to the consultation papers.

However, we would also like to raise concern that following the Matthews Final Report on NSW water management and compliance it already seemed apparent the direction the NSW Government was taking in respect to the protection of environmental flows, metering and the provision of water related information prior to any public consultation on the proposed amendments.

Please find following our feedback to the papers.

Water Take Measurement and Metering

As discussed at the regional consultation meetings. It is important for the NSW Government to consider that not one single standard may be appropriate in all circumstances and for all meter equipment.

We are concerned that narrowly focusing on the AS 4747 standard could prevent the consideration of other innovative and accurate water take measurement approaches (including other standards like the ISO accreditation) that may be equally, if not more appropriate and fit-for-purpose for NSW.

Pattern-approval alone does not necessarily lead to more accurate measurement of water take and as such, the focus should rather be on how to validate the accuracy of any water take through a range of metering equipment This is particularly important as AS 4747 is not available for all types of water take structures

Further information on how many of these pattern-approved meters are currently available and how many may be required for a potential future installation will be crucial to assess the timeframe around a transition to a new water take measurement and metering approach.

One of the widely used meters in inland NSW 'Mace', is currently not pattern approved, it is our understanding that the company is applying for pattern approval for the Series 3AgriFlo meters. The timeframe around the accreditation is currently not known, hence we suggest that further assessment around these practical challenges should be taken into consideration in the further development of a NSW water take measurement and metering approach.

Many of the meters on large open channel offtakes are not pattern approved and it is unlikely that pattern-approved meters of sufficient size will be commercially available. An alternate measurement system for large, open channel offtakes incorporating regular, independent verification should be considered by the NSW Government.

There needs to be a resolution to the existing meter installations which may or may not be compliant with the AS 4747 standard and allow for telemetry and remote data collection.

We would like to request that an assessment is made on whether existing meter installations that are compliant with the NSW Interim Standards can be upgraded to meet AS 4747 standard, and if so, what a suitable transition period and process can be. Also, consideration for retrospective pattern-approval for Mace Series 3 meters already installed should be possible with a firmware upgrade. We recommend that implementation of new metering requirements should allow for a transition program for Mace meters, given the large number of Mace meters currently installed in inland NSW.

Where an upgrade to meet AS 4747 is not possible, the existing installations should be grandfathered for an appropriate number of years in recognition that the replacement of (recently) installed meters would be cost prohibitive for WAL holders.

When will self-reporting be permitted?

The recommendation in the Matthew Report to remove all scope for self-reporting is impractical. Self-reporting needs to continue in limited circumstances such as outlined in the consultation paper.

1. Where the water user is not required to have a meter
2. When a water meter is not working

Transparency Measures

We believe some of the recommendations from the Matthews report were made in haste. Whilst we welcome monitoring and compliance by regulators we believe we should also be afforded our right of privacy and commercial sensitivity of business operations.

As outlined in the consultation paper there is already considerable information available to the public. The Matthews report recommends meter readings and real-time water account balances should also be available to the public. As outlined in the consultation paper consideration should be given to the operational risks of releasing this information.