



Metering Submission Form

Email your feedback to water.reform@industry.nsw.gov.au by 5pm 12 August 2019.

The information you provide in this form will only be used for the purpose for which it was collected. By submitting, you consent to your submission being published on the Department website unless otherwise stated.

I do not consent to my submission being made public.

Classification (please tick)	<input type="checkbox"/> State Government	<input checked="" type="checkbox"/> Rural industry group	<input type="checkbox"/> Aboriginal organisation
	<input type="checkbox"/> Local Government	<input type="checkbox"/> Community member	<input type="checkbox"/> Environmental group
	<input type="checkbox"/> Irrigator/farmer	<input type="checkbox"/> Peak representative org.	<input type="checkbox"/> Other
Name	May Ewing		
Organisation (if applicable)	Lachlan Valley Water		
Phone	[REDACTED]		
Email	[REDACTED]		
Postcode	2871		

The draft public exhibition regulation includes proposed changes to the recording and reporting mandatory conditions. Do you have any comments on the recording and reporting requirements?

Yes

No

If yes, please include your comment below and indicate whether it relates to works

A. not required to meter (that is, below the metering thresholds) - clause 250 of the regulations

B. required to have a meter and data logger but not telemetry - new mandatory condition clause 244A of the regulations

C. required to have a meter, data logger and telemetry - clause 244 of the regulations

Please provide your comments on the proposed recording and reporting requirements

...Refer

attached.....

.....



If you would like to provide any additional information or supporting documents to help us understand your view, email water.reform@industry.nsw.gov.au from the same email you provided above.



ABN 38 597 032 631

Lachlan Valley Water Inc

Sustainable, productive and efficient water use in the Lachlan Valley

16 August, 2019

Water Renewal Task Force
NSW Department of Property, Industry and Environment

By email: water.reform@industry.nsw.gov.au

Submission on Metering Regulations Amendment

Thank you for the invitation to make a submission on the proposed changes to the regulations.

Lachlan Valley Water (LVW) represents over 500 individual irrigator members in the Lachlan Valley, including both surface water and groundwater users, and our members represent all categories of licences except those held by environmental water managers. LVW is also a member of NSW Irrigators Council, and supports the submission provided by NSWIC. Our submission has been prepared on behalf of LVW members, although individual members also reserve the right to make their own independent submissions.

This submission is presented in two sections; comment on the draft regulatory amendments, and feedback on other metering implementation issues.

1 Draft Regulatory Amendments

Section 231 On-farm works

Support the proposed amendment not to require on-farm works that are not nominated on an access licence to comply with the metering regulations. These works are merely redistributing water that has already been metered on extraction from the river or bore.

Section 232 Inactive groundwater works

Support the proposed amendment to extend the provision regarding inactive works to groundwater.

Section 244A Reporting when no telemetry installed

Support the proposed amendment to require the reporting of meter readings on a monthly basis and water take on an annual basis, and recommend that clear information be provided on the required format and method for reporting so that there is no confusion about this obligation. As water management and accounting in all other respects is handled on a water year basis (1 July to 30 June) we suggest that the subsection 3(b) regarding reporting of water take on a calendar year basis be amended to require reporting at the end of the water year.

Schedule 8 Installation of meters

Support the proposed amendment that a duly qualified person (DQP) is not required to install a meter, provided the requirement for a DQP to validate the installation is maintained.

Schedule 8 Tamper evident seals

Support the requirement that tamper evident seals must be sourced from an approved body.

2 Metering Implementation Issues

Telemetry

At the Condobolin consultation on 12 August it was acknowledged that there are still no telemetry devices authorised to connect to the Eagle.io data acquisition system, although 3 devices are undergoing final testing. It was also stated that Eagle.io is currently designing a platform or dashboard to enable water users to access their own data. We are concerned that it is extremely late in the process for this work to be undertaken given that over 1200 works will need to comply by 1 December 2019.

Additionally, a number of our members with works over 500mm have already installed their own on-farm telemetry systems to improve water management, and at this stage it is unclear whether they will be able to continue to access their own data as they do now and what changes they may need to make to comply with the regulations.

Those attending the Condobolin meeting also expressed concern that the approach towards security of data transmission will potentially make it very expensive for irrigators to have any problems with their telemetry units investigated and repaired if a DQP is required to access the unit on-site rather than being able to log in externally. We understand that all units will register all log ins and that a procedure could be developed to allow authorised log in by a DQP as the initial procedure to check a problem, as opposed to a 500km round trip for on-site access.

LVW recommends that the roll-out date for installation of telemetry be deferred to 1 December 2020 to allow these problems to be addressed.

Existing meters and accuracy verification

The Departmental staff at the consultation stated that Manly Hydraulics is currently assessing 5 accuracy testing methods, to provide guidance to DQPs on acceptable in-situ accuracy verification options. The difficulties with in-situ verification were raised at the metering field days LVW ran in March, and members will welcome guidelines that provide certainty to DQPs. However, it is unclear when the approved methodology for in-situ testing will be publicly available, and there are still only a limited number of DQPs available in NSW, and none based in the Lachlan, with the nearest located at Hay, Griffith or Dubbo.

We also understand that Mace has now received an accuracy statement for Series 3 meters, which will allow DQP validation of these meters so that they can continue to be used after 1 December.

This combination of factors makes it difficult for those who need to meet the 1 December roll out date to do so in time. We appreciate that NRAR proposes to establish a one-off register for 6 months allowing irrigators who have been made genuine efforts but been unable to meet the compliance date, to advise NRAR of their situation. However, we are conscious that 6 months may not be long enough with the constraints mentioned above, and recommend that there should be a mechanism to allow irrigators to continue to take water through an existing meter while they complete the actions required to meet the mandatory metering requirements.

We recommend that those irrigators who have made efforts to meet the requirements by the roll out date but been unable to do so, be able to apply for a Ministerial exemption under Section 233 of the regulations, as a transitional measure.

Roll-out dates

The NSW Murray Darling Basin Fractured Rock Groundwater Source is listed as an 'at risk' groundwater source and included in the Northern Inland roll-out date. However, this groundwater source extends geographically across both the Northern Inland and Southern Inland areas, and we are concerned that there is potential for confusion if it is not clear to an irrigator whose bore is physically located in the Southern Inland, but who is part of the MDB Fractured Rock Groundwater source, that the required compliance date is 1 December 2020.

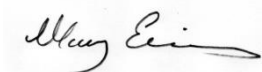
This is a particular problem for groundwater users in the Lachlan catchment, especially in the Young Granite and Orange Basalt. We acknowledge that the map in the Metering Guidance Tool does include a note that five groundwater sources including the NSW MDB Fractured Rock are part of the Northern Inland roll-out.

We propose that implementation of metering requirements would be clearer if the roll-out dates for those groundwater sources that extend across both the Northern Inland and the Southern Inland were aligned geographically, ie, if the catchment in which the bore is physically located is in the Southern Inland, then the roll-out date is the Southern Inland date.

However, should this not be adopted, we recommend that the communication around roll-out dates should be explicit that the whole of the NSW MDB Fractured Rock groundwater source is required to be compliant by 1 December 2020, even if the bore is not physically located in the Northern Inland area. To avoid confusion, the communication should list the Orange Basalt, Young Granite and Lachlan Fold Belt groundwater sources as areas that must comply by 1 December 2020.

Please do not hesitate to contact us if you have any queries about the matters raised in this submission.

Yours sincerely



Mary Ewing
Executive Officer

Environmental Outcomes

Water Recovery

Additional 450 GL



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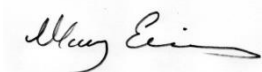
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