



Healthy Rivers Dubbo

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Submission: Proposed amendments to water metering regulation in NSW 2019

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Introduction:

Healthy Rivers Dubbo is a community grass roots group dedicated to providing a strong voice for our local rivers and wetlands, and for the Murray-Darling Basin as a whole. As ambassadors for healthy rivers, wetlands and groundwater, we have been active in our community calling for transparency and accountability in all aspects of water management.

Healthy Rivers Dubbo pays our respects to the Traditional Owners, past, present and future, of the land we live in. We acknowledge that the land in which we live was never ceded.

Healthy Rivers Dubbo considers the secure and transparent collection of accurate and relevant data to be a vital step towards the goal of good water management, and appreciates the opportunity to make a submission to the proposed amendments to water metering regulation in NSW.

Proposed Amendments to Regulation:

1. Installation of meters: A duly qualified person (DQP) will not be required to install or re-install a meter. This does not remove the requirement for a DQP to validate meter installation.

Healthy Rivers Dubbo strongly disagrees with this proposed amendment. We believe the certification of meters installed by a non-DQP would require inspections at three different stages of installation, and that the final inspection is required when water is available to be pumped. Irrigators will be very keen to pump as soon as there is water available to do so – if a DQP

inspector finds at the final inspection that the installation of the meter is sub-par, pumping must cease. We are concerned that the pressure of this situation may encourage some irrigators to run the risk of pumping without meters.

2. Inactive works: Extends the existing inactive works exemption to groundwater works where those works are not used, and are rendered incapable of being used to take water (currently only applies with respect to surface water works). A work that is 'inactive' will not be required to comply with the metering rules.

Healthy Rivers Dubbo agrees with the extension of the inactive works exemption to groundwater works. We are glad to read that it is an offence to use water supply work to take water when it is prohibited by a condition of the licence/approval, and trust that WaterNSW adequately informs the user of their legal obligations once signing a declaration for inactive works.

3. Tamper evident seals: Seals installed on meters must be sourced from an approved body. This will ensure the integrity of the seals and that they can be traced and audited.

Strongly agree with this amendment. Anyone would have been able to purchase another tamper proof seal from a supplier and replace a damaged seal on a meter. This is a very important amendment, as it closes what would have been an unacceptable 'loophole' in the policy, virtually rendering the tamperproof requirement unenforceable. We are grateful that an irrigation specialist highlighted this loophole, and dread to think of the consequences should this amendment not be included changes to the legislation.

4. Reporting when no telemetry installed: Imposes a new mandatory condition where a meter does not have telemetry and requires the reporting of information about water take.

Healthy River Dubbo notes that stock & domestic extraction is not required to be metered and reported under this policy with concern. We hope the measuring and reporting of stock & domestic extraction will be addressed in the near future.

For works NOT REQUIRED to have a meter – extra requirement to record water taken under basic landholder rights, and evidence of permission of take in unregulated sources. Required to report every 3 months.

We agree that take of basic landholder rights be recorded, and evidence of permissions to take in unregulated sources must be kept for 5 years (5 years was mentioned verbally at the Roadshow in Dubbo on 17/7/19, but does not appear in the summary of proposed regulation changes).

The requirement to report extraction volumes should be monthly, not quarterly. Irrigation season is usually about 5 months. It's important that data for these months be reported more frequently than every quarter, so that and irregularities can be swiftly identified.

For works REQUIRED to have a meter – extra requirement to report metered take monthly, report basic landholder rights take every 3 weeks, report annually water take recorded on data logger.

Healthy Rivers Dubbo agrees that licenced extraction should be reported no less frequently than monthly. It might, however be more efficient to have the requirement to report licenced take every 3 weeks in line with the requirement to report basic landholder rights extraction. Any efficiencies that have the potential to streamline processes also have the potential to reduce frustration from the user (which can increase the risk of non-compliance).

Data logger reports should be submitted monthly with cumulative totals, not annually. Irrigation occurs over a few months of the year, and the activity in those relevant months needs to be assessed as compliant as close to the dates of extraction as practical. Once a year is not often enough.

5. On farm works: Works that are not nominated on an access licence will be exempt from the metering rules. These works are not authorised to take water under an access licence so a meter is not required to be installed. This will help avoid water taken under an access licence from being counted twice.

Agree with this proposed amendment.

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