



I N L A N D
R I V E R S
N E T W O R K

PO Box 528, PYRMONT NSW 2009
ph 0428 817 282
email inlandriversnetwork@gmail.com
web inlandriversnetwork.org
ABN 34 373 750 383

Submission
Consultation Paper
Water take measurement and metering

Introduction

IRN supports the case for universal metering. Both the Matthews Report and the MDB Compliance Review recommended a policy of ‘no meter, no pump’

We agree with the statement in the consultation paper that ‘*Accurately measuring water take is critical to maintaining the value and integrity of the water-sharing framework*’.

Accurate metering of all water extraction or ‘universal’ metering is the only way to protect planned environmental water as identified in Water Sharing Plans. It is also the only way to protect basic rights and downstream water users.

The metering of all water extraction is the only way to determine if the Sustainable Diversion Limits (SDLs) as set under the Basin Plan are met in each water source.

Response to issues and options

1. Objectives for Meter coverage

IRN supports that the objectives for water take measurement and metering should focus on the staged roll out of meters for all water use across NSW.

We do not support that mandatory requirements are restricted to higher risk users. Meters should be mandatory for all users. However, we support the objective that resources are prioritised to target high risk users and high risk water systems in the roll out of metering across NSW.

An additional objective should also give priority to water systems with a high usage of held environmental water and that provide high levels of connectivity in the roll out of meters across the state.

We do not support the objective that the costs of water measurement be weighed against the benefits. The integrity of water sharing arrangements should be benefit enough to justify the measurement and metering of all water take.

2. Topic 1: When should a meter be required?

IRN supports Option 1 that every water user be required to be measured or ‘universal’ metering. This is a high community expectation and the only definition of ‘no meter, no pump’ that is satisfactory. There should not be thresholds applied to smaller or ‘lower risk extractors’.

The cost of metering all water take will assist in decision-making to amalgamate works into one larger extraction point or to sell small uneconomic licences.

If there was a threshold applied to smaller irrigators and they were allowed to continue using the log book ‘honesty box’ system, then potentially:

- Several exempt extractors next to each other could each take water over their entitlement. The accumulative effect of this over extraction would be detrimental to the river environment, potentially threatening the resilience of a previously regarded ‘low risk’ environment.
- Some irrigators could abuse the log book system, over extract and gain significant financial benefit from the crops they grew with stolen water.
- Managing a system where some irrigators were exempt from metering and some were not creates complexities in monitoring compliance that would add layer of expense to the bureaucratic practices within DPI Water. These expenses and complexities are an unnecessary burden to the tax payer.
- It will be harder to demonstrate compliance with SDLs set in Water Resource Plans and that planned and held environmental water was protected.

Rather than consider small intermittent water users to be below a threshold for metering, they should be encouraged to sell their allocation to metered users. The cost of metering will encourage more economically efficient water use.

Option 2 is not supported because tracking shares in a water source would require greater surveillance of temporary water trading activity.

Option 3 is not supported because the issue of multiple pumps on one property supports the arguments provided above for Option 1. We do not support that the definition of ‘no meter, no pump’ relates to the measurement of 80% of water use in each region.

Option 4 is not supported as a method of deciding which water users should or should not be metered. We consider that all water use must be metered.

However, the risk to water sources approach should be used in a staged roll out of water metering requirements. The risk should also include water sources with a high usage of held environmental water and that provide high levels of connectivity.

Option 5 should be used in the prioritisation of the roll out of ‘universal’ metering across the state so that water use in high risk catchments with a large share and large pumping capacity is in the first tranche of mandated metering.

3. Topic 2: What type of metering and reporting will be required

IRN supports the proposed future metering requirements and that all water use be metered by pattern approved meters. This would require the replacement of existing non-pattern approved meters.

The Matthews Report recommended that all scope for self-reporting be removed. IRN supports this recommendation.

We do not support that water can continue to be extracted if a meter is not working. This should not be a criteria for allowing self-reporting.

The licence holder should notify the authority immediately that a meter is faulty and cease pumping. Meters should be maintained, tested and calibrated outside the irrigation season or when it known that water will not be needed.

This should not be a reason to allow self-reporting, especially for large users in high risk areas. Section 911 of the *Water Management Act 2000* needs to be amended so that no water can be taken when a meter is not operating properly.

This amendment should be included in the *Water Management Amendment Bill 2018*.

If a harvester breaks down during the season, harvesting cannot continue. Likewise if a pump breaks down. There should be no exceptions given for faulty metering.

4. Topic 3: How should metering requirement be rolled out

IRN supports the proposed staged timetable in principle.

However, we consider that the top 10% of any metering threshold in high risk unregulated inland water sources be metered by the commencement of the Basin Plan Water Resource Plans in July 2019.

The definition of high risk area should also include if the water source has a high usage of held environmental water and/or provides high levels of connectivity to downstream water sources.

5. Topic 4: Who should own meters

IRN supports that all water users should purchase and own a pattern approved meter in the timeframe required.

Conclusion

IRN welcomes and supports moves to improve monitoring and compliance as an essential component of overall improved management of water in NSW.

Combined with improved transparency measures, 100% metering of all water take in NSW will increase confidence that compliance with water sharing requirements is met.

For more information about this submission please contact:

Anne Reeves
Secretary
inlandriversnetwork@gmail.com

Friday 13 April 2018