



**NSWIC**  
NEW SOUTH WALES  
IRRIGATORS'  
COUNCIL

PO Box R1437  
Royal Exchange NSW 1225  
Tel: 02 9251 8466  
Fax: 02 9251 8477  
[info@nswic.org.au](mailto:info@nswic.org.au)  
[www.nswic.org.au](http://www.nswic.org.au)  
ABN: 49 087 281 746

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## **Position Paper**

# ***Metering in Compliance with National Standards***

**110912**

Andrew Gregson  
Chief Executive Officer

## Introduction

NSW Irrigators Council is the peak body representing Water Access Entitlement holders across the State. In existence for 27 years, the Council is comprised of regional representative groups (coastal and inland), commodity groups, infrastructure operators and state wide representative groups.

Council engages in advocacy, policy development, public and media relations. As an apolitical entity, we are available for the provision of advice to all stakeholders and decision makers at all times.

## Policy Positions

At a meeting in July of 2011, Council passed the following motion;

*That NSW Irrigators Council reject the NSW Sustaining the Basin Program Metering Project in its current form as outlined in the publicly available business case, because of:*

- *Lack of consultation with water users ;*
- *Inequitable sharing of cost and benefits across users and systems; and*
- *No ground truthing of information underlying key assumptions;*

*and we seek to urgently work with the NSW Government to resolve our issues with the business case.*

Council subsequently considered and adopted the following motion;

*That NSW Irrigators Council request that the NSW Government work with industry to develop an agreed implementation plan to ensure that water users in NSW meet the National Metering Standards. The plan should seek to develop an appropriate funding model for implementation of the standard by giving consideration on a valley-by-valley basis to:*

- *who should own and maintain meters;*
- *what meter installations and upgrades will be necessary to meet the new standard;*
- *opportunities for value-adding e.g. telemetry and CARM;*
- *estimates of the likely cost of necessary installations and upgrades, and any value-adds;*
- *robust modeling of any “savings” that might be achieved and the potential beneficiaries of these savings;*
- *identification of any third party impacts, and methods of mitigation; and*
- *potential funding sources, e.g. state and commonwealth grant programs, State Water Corp, water users, sale of any water “savings” (where they are demonstrated to exist), irrigator direct funding, T-Corp, individual entitlement return, etc.*

This Position Paper addresses methods by which NSW could implement and monitor the use of nationally compliant meters

A separate Position Paper addresses the NSW State Priority Project for Metering, which has been rejected by NSWIC.

## **Metering**

NSWIC stands in support of modern and accurate metering on the basis that “if you can’t measure it, you can’t manage it”<sup>1</sup>.

In the short term, NSWIC recognises that management of water extraction will utilise a number of tools, not all of which will be metering. In many instances, meters are not yet compliant, cost effective or sensible policy tools. For example, NSWIC does not advocate the short term requirement for installation of meters on all extraction points such as Basic Landholder Rights that are subject to Reasonable Use Guidelines.

In the longer term, NSWIC “appreciates that national water initiatives will mean that, over time, all water extractions will be the subject of metering.”<sup>2</sup>

## **Metering Compliant with National Standards**

NSWIC supports the National Water Initiative mandated move to national metering standards<sup>3</sup>.

NSWIC understands that meters installed post 1 July 2010 are to be pattern approved in accordance with the requirements of the National Measurement Institute and to be installed and operated in accordance with ATS 4747.

At the time of writing, we do not believe that any meter yet complies with the pattern approval requirement. An overall concern of Council in respect of Government programs in metering, particularly the State Priority Project for Metering, is an inexcusable lack of industry engagement. Gaps such as that identified here would, largely, be obviated by meaningful consultation with those who are affected by the program. Clearly, a national standard that *cannot* be complied with is meaningless.

## **Support for National Standard Compliant Meters**

NSWIC supports the use of meters compliant with national standards. We will support a program that is well designed (in conjunction with users) to ensure that such meters are installed in the most effective and efficient manner.

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<sup>1</sup> [http://nswic.org.au/pdf/policy\\_documents/090316%20-%20BLR%20Policy%20FINAL.pdf](http://nswic.org.au/pdf/policy_documents/090316%20-%20BLR%20Policy%20FINAL.pdf) at page 4.

<sup>2</sup> Ibid, page 5

<sup>3</sup> Paragraphs 87 and 88 of the NWI

Further, we encourage modern metering systems that utilise remote telemetry that allow Computer Aided River Management (CARM) systems to be implemented leading to efficiency in water management and benefits for all.

### **Designing a Metering Program**

The second motion adopted by Council, referred to in the opening of this Position Paper, reflects the fact that much consideration and engagement is required to design and implement a state wide (indeed, national) metering program. To date, very little of this has occurred.

NSWIC has indicated its support for modern and compliant metering installations and has consistently offered its support to design a program to achieve that.

The motion indicates what should be considered a list of questions to be answered in designing a program in consultation with irrigators;

- Who should own and maintain meters?
- What meter installations and upgrades will be necessary to meet the new standard?
- What opportunities for value-adding exist e.g. telemetry and CARM?
- What are the estimates of the likely cost of necessary installations and upgrades, and any value-adds?
- Where is the robust modelling of any “savings” that might be achieved and who are the potential beneficiaries of these savings?
- Can we identify of any third party impacts, and can those impacts be mitigated?
- What are the potential funding sources, e.g. State and Commonwealth grant programs, State Water Corporation, water users, sale of any water “savings” (where they are demonstrated to exist), irrigator direct funding, T-Corp, individual entitlement return, etc?

NSWIC stands willing and able to assist governments to address these questions in designing a metering program. We look forward to our long standing offer being taken up to achieve just that.

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