



# RESPONSE TO THE NSW WATER REFORM ACTION PLAN

## WATER TAKE MEASUREMENT AND METERING CONSULTATION PAPER

*April 2018*

### **1. THE RICEGROWERS' ASSOCIATION OF AUSTRALIA**

The RGA is the collective voice of Australian rice growers representing the interests of around 1200 voluntary members. The RGA's key objective is to provide members with strong and effective representation on issues affecting the viability of their businesses, communities and industry.

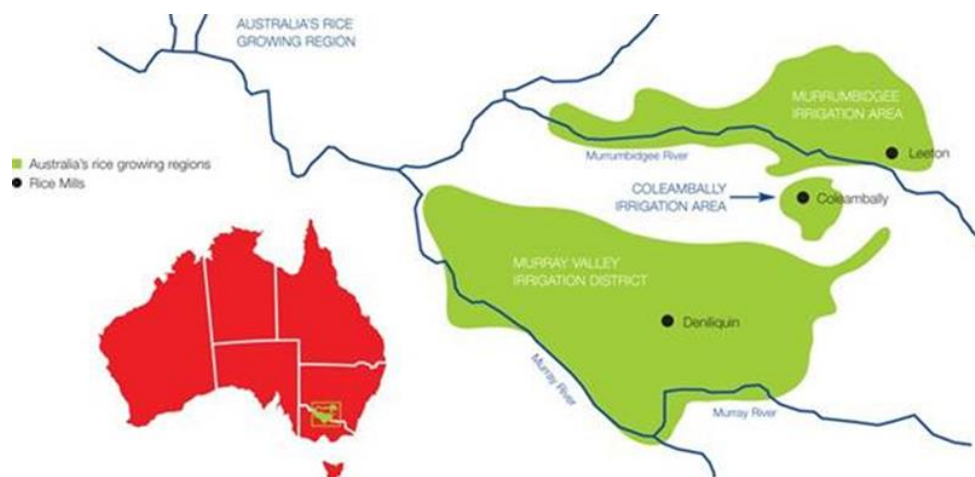
The RGA is made up of eight branches located across the Riverina rice growing regions of NSW and Victoria. Each branch annually elects representatives to form the RGA Central Executive. The Central Executive represents their respective branches in determining RGA policy and projects.

The RGA is a member of the National Farmers' Federation, National Irrigators' Council and NSW Irrigators' Council.

### **2. THE AUSTRALIAN RICE INDUSTRY**

The Australian rice industry is located predominantly within the Riverina region of NSW, with two small industries also situated in the Northern Rivers region of NSW and in Northern Queensland.

The Australian rice industry is reliant upon irrigation sourced from the Murray and Murrumbidgee valleys. Provided water is available, the Australian rice industry is considered one of the world's most successful, delivering significant yields while leading the world in water use efficiency.



The rice industry is a significant economic contributor to the Riverina region of NSW. The towns of Griffith, Leeton, Coleambally, Finley, Jerilderie, Deniliquin, Wakool and Moulamein are highly dependent on rice production for their social and economic wellbeing. Additionally, rice growers have individually invested over \$2.5 billion in land, water, plant and equipment and collectively invested around \$400 million in mill storage and infrastructure through SunRice.

While the NSW rice industry is very small by world standards, it remains a competitive supplier of premium rice products into world markets.

### 3. THE RGA'S RESPONSE

The RGA supports the six key objectives of the NSW Government's future water take measurement and metering approach as outlined in the Consultation Paper. These objectives should guide the NSW Government's approach toward developing an efficient, equitable and enduring methodology for water take measurement and metering. This will provide the wider community with the confidence that water resources are being managed effectively and that water users are operating in accordance with the law.

The RGA's submission is principally focussed on the Southern Basin comprising of the Murray and Murrumbidgee valleys, and on water take for the purpose of irrigation. These systems are already metered to a very high standard and it is critical that the NSW government ensure that these advanced systems are not subject to adverse impacts as a consequence of any of the solutions developed for ensuring metering and compliance.

#### Consultation Topic 1: When should a meter be required?

The RGA supports the principle that all irrigation water use should be subject to an adequate standard of metering.

However the RGA does not provide comment on which of the three proposed threshold is most appropriate (water share component, infrastructure size or risk to water source) is most appropriate. Rather the RGA believes that the appropriate threshold will need to account for the unique characteristics of each valley (in particular regulated/unregulated/groundwater) and therefore should be determined on a valley basis (potentially through the Water Sharing Plan/Water Resource Plan process).

## **Consultation Topic 2: What type of metering equipment and reporting will be required?**

The RGA supports ‘the principle underlying the metering requirements is that all meters should be **accurate, verifiable and auditable**’.

However it is critical that the application of metering requirements does not undermine the significant investment made in metering technologies over the last decade in the southern basin. For example, the Murray and Murrumbidgee Valleys have both benefited from recent upgrades to telemetry metering through the ‘NSW Sustaining the Basin Program – Southern Valley Metering Project (iWas program)’<sup>1</sup>. This NSW Government program saw the NSW government invest in a state of the art metering and compliance system. However some of the meters upgraded/installed through this program do not meet the AS4747 pattern approval requirements (including Mace meters). Enforcing this standard for these meters will see a significant undermining of this previous NSW government program, despite these meters being considered highly accurate.

## **Consultation Topic 3: How should the metering requirements be rolled out?**

As stated above, it is critical that the NSW Government recognise that the Southern Connected Basin, is currently subject to very high standards of metering and compliance. Changes to metering standards to address metering and compliance issues should not adversely impact upon compliance in the Southern Basin, in particular when there is unlikely to be any improvement to the already very high standards of metering/compliance.

The RGA therefore suggests that the NSW Government recognise this high level of metering and compliance and ensure that their ‘roll-out plan’ does not place unwarranted requirements on Southern Basin Water users.

## **Consultation Topic 4: Who should own meters?**

The ownership of meters should be determined on a valley basis. However consideration of same should take into account the cost share framework for the respective valley, the level of investment in capital expenditure for the valley, the apportionment of the on-going maintenance costs, and the likelihood of further irrigation extraction development within the valley.

## **4. CONTACTS**

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<sup>1</sup>[http://www.water.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0008/549278/recovery\\_sustain\\_basin\\_bc\\_meters\\_now\\_11june10.pdf](http://www.water.nsw.gov.au/__data/assets/pdf_file/0008/549278/recovery_sustain_basin_bc_meters_now_11june10.pdf)