

Department of Planning and Environment

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Southern inland roadshow report

Non-urban water metering reform

May 2023



Acknowledgement of Country

The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the Traditional Custodians of the land and we show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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Southern inland roadshow report

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Introduction

The non-urban water metering framework became law in December 2018 with staged deadlines for installing compliant equipment rolling out over six years, until 1 December 2024. The framework is based on national non-urban metering standards, agreed by all Australian states and territories in 2009.

Development of the non-urban water metering framework was a key commitment of the NSW Government's 2017 Water Reform Action Plan and the Murray–Darling Basin Compact. It was informed by public consultation with water users and the metering industry.

Under these rules, approximately 95% of licensed water take capacity will need to be fitted with accurate, auditable and tamper-evident metering equipment. While many water users already use meters to record their water take, these rules apply a consistent standard to all water users. This consistent standard helps to ensure that the relevant government agencies know how much water is being taken and whether it is being taken according to the rules.

Water users in the NSW southern inland have been given extra time to install non-urban metering equipment in the wake of significant rainfall and widespread flooding. The compliance date for water users in the southern inland is now 1 June 2023.

The series of information sessions reported on in this document were undertaken by the Department of Planning and Environment's Water Group (Water Group) to provide water users in the southern inland with the information they required to assist with compliance.

Consultation session process

The information sessions for the southern inland included presentations by the department, WaterNSW and the Natural Resources Access Regulator (NRAR). The agenda for each session was:

- Welcome and Acknowledgement of Country
- Non-urban water metering policy background, context and rules (Water Group)
- Licensing, exemptions and basic landholder rights (WaterNSW)
- Compliance approach (NRAR).

Time for questions and answers was provided between each topic.

The presenters were:

- Suzy Lykos and Hannah Grogan (Water Group)
- Martin Brooks, Andrew Glasson and Shaun Mills (Water NSW)
- Keeley Reynolds and David Thomas (NRAR).

At the conclusion of each session participants were invited to stay for lunch and ask questions of agency representatives.

ATX Consulting facilitated each session and was responsible for recording and reporting.

Key Issues

There were a range of key issues and common themes identified in the consultation sessions, as outlined below.

Awareness and acceptance

As would be expected at this stage of the non-urban water metering reform process, attendees at most of the southern inland sessions indicated a reasonably high level of awareness of the reforms. With some exceptions, there was a general level of acceptance of landowner responsibilities regarding compliance.

There was some limited debate about the nature or intention of the reform but the majority of discussion over the six sessions focussed on how to comply. There was some detailed discussion about understanding compliance requirements for particular on-farm circumstances.

The exception to this general level of acceptance was the session held in Deniliquin, where participants raised issues about pumping water for environmental reasons and the application of the rules to spearpoints. These issues are discussed in detail under the Shallow groundwater sources.

Basic landholder rights and stock and domestic licences

There was some confusion, requiring extensive discussion, about basic landholder rights (BLR) and stock and domestic water use. Discussion focussed on what constituted BLR and the extent to which these users were required to meter under the non-urban water metering rules.

Questions included whether BLR applied under various land ownership and title scenarios including leased land, leased Crown Land and also where there are easements over properties to enable water access. Most of these situations were able to be clarified at the sessions but the number and range of questions did indicate a degree of complexity in this area and some confusion about when BLR exemptions apply.

Mandatory requirements to meter

The relationship between non-urban metering rules — and, in particular, the exemptions — and pre-existing metering requirements included in some water sharing plans was another area of confusion.

Water Group representatives stressed the importance of water users being aware if they have a pre-existing metering condition. This discussion suggested water users lack awareness of their licence and approval conditions, and whether they are required to comply with pre-existing

metering conditions. Speakers at these sessions reinforced the importance of water users being aware of the conditions they had to comply with.

Duly qualified person availability

The availability of duly qualified persons (DQPs) to install and validate metering equipment was a cause of concern for a number of stakeholders, and was raised consistently throughout this series of information sessions. NRAR's 'reasonable efforts to comply' approach was stressed throughout the sessions and was an important response to the DQP availability concerns.

The availability of DQPs in more remote areas of far western NSW was noted as an especially difficult issue.

Shallow groundwater sources

The Deniliquin meeting included a high level of concern and frustration regarding the application of non-urban water metering requirements to spearpoints or bores that are used to pump groundwater to lower the water table. The history of pumping groundwater from the Lower Murray groundwater source for environmental benefit is a longstanding practice that stakeholders feel has been encouraged by government since the 1980s.

Many participants were concerned that water that has been pumped for environmental reasons — to lower the water table and reduce salinity — is now being considered irrigation water and subject to the metering requirements and the costs associated with purchasing equipment. There was a strong view expressed that this form of pumping to lower the water table should be provided an exemption from the non-urban metering rules.

There was frustration expressed by these water users that even though they had raised these concerns in the initial stages of consultation for the non-urban water metering reform, their concerns had not been responded to.

Financial impact on small water users

The financial cost for small water users to install metering equipment was a common concern. A number of farmers who attended these sessions advised that they do not rely on irrigation as their main farming resource but use it on a supplementary or secondary basis.

The inclusion of works with existing meters in the non-urban metering reforms was considered too strict and water users at these sessions wondered if it was unintentionally capturing works the policy did not intend to include.

It is anticipated that these issues will continue to be raised as the metering rollout extends to the coastal regions where there are thought to be many small irrigators.

Individual landowner discussions

One of the most valuable aspects of the southern inland information sessions was the opportunity for water users to meet individually with WaterNSW licensing staff, as well as Water Group and NRAR representatives, after the formal presentations concluded. These one-on-one discussions allowed licensing staff and other agency representatives to access water users' specific licence and approval details, discuss farm practice in detail and then provide a more tailored response to their requirements for compliance. Many water users spoke of the value of these discussions in improving their understanding of their compliance obligations.

Figure 1. Yanco information session



Information session questions and answer summary

The following is a summary of the questions and answers discussed during southern inland information sessions. The comments and responses are not necessarily verbatim but best efforts have been made to capture both questions and answers accurately. Where appropriate links to documents and additional information that assist with answering a question have been included.

Cowra – 9 May 2023

Question/Comment	Response
I have a bore with a 70 ML entitlement but don't want to irrigate anymore. I only want to extract basic landholder rights from now on. Do I have to install a meter and comply with the regulations?	If you are only taking water under BLR, you would be exempt from the metering rules. You can advise WaterNSW that you are using the work for BLR.
For the previous question with someone reducing from a licence for 70 ML to just BLR, would you need to downsize your pump?	Not if you are only going to be using the pump for BLR purposes. If only using BLR, you would be exempt from non-urban water metering rules regardless of pump size. You would just have to make sure that you are using the water for BLR only as NRAR will check this if they inspect your site.
If you are only using for BLR is there any advantage to installing a local intelligence device (LID)?	It is a personal choice but you are not required to install a LID. The installation of the LID would involve some cost to you.
There is no quantitative limit on BLR now but could a limit be introduced in the future?	We are not aware of any intention for a limit to be introduced.
The presentation said that there was an exemption for pumps less than 100 mm. Where is this measurement taken from?	The measurement is the internal diameter of the exit pump and/or outlet. This is stated in the policy for groundwater but not for surface water. We have an understanding between the agencies (Water Group, WaterNSW and NRAR) that we will apply the 100 mm internal diameter measurement for surface water as well.

Question/Comment	Response
<p>Following from the previous question about pump diameter, is there a limit on the number of pumps that you can have?</p>	<p>No, however, there is a multiple pumps rule that will apply. You can find information by using the Metering Guidance Tool on the department's website (water.nsw.gov.au/metering).</p>
<p>What about portable pumps? We have been told that a meter has to be linked to a specific ESID?</p>	<p>The department has a guide to installing metering equipment on a portable pump. Visit water.nsw.gov.au/metering > Non-urban metering document library.</p>
<p>If you do choose to use manual logging, do you still have to report for the months that you don't irrigate? We may only irrigate two months of the year.</p>	<p>The requirement is to report on take every month including those months when no water is taken.</p>
<p>For the Lachlan Valley, we had applied for a further extension in the deadline for compliance because of the flooding – what is the status of this request?</p>	<p>At the moment we are working towards a 1 June 2023 deadline. The NSW Government did extend the original deadline by 6 months to 1 June 2023, to give water users a reprieve as they faced ongoing flood events.</p>
<p>What is the definition of 'commercial' used in the non-urban water metering rules? Where is the definition coming from and is it consistent with the Australian Tax Office (ATO) definition? The ATO allows you to undertake small activities like selling flowers at a local market without it being considered a commercial activity</p>	<p>Water taken for commercial use must be licensed. Commercial use includes irrigation, mining, manufacturing, power generation, snow making, dairies, intensive animal production, tourism facilities and aquaculture.</p> <p>Further information on what activities are stock and domestic and what activities are considered commercial is available on the department's website at water.dpie.nsw.gov.au > licensing and trade > basic landholder rights > domestic and stock rights.</p>
<p>We have a piggery with most of our pumps exempt because of diameter size, we did see that the presentation included an exemption lapse timeframe of December 2024 – what does that mean?</p>	<p>The exemption for small, low-risk works used solely to take water under a stock and domestic water access licence is due to lapse in December 2024. This does not mean that the exemption will be repealed at that time. The exemption will be reviewed prior to December 2024 to determine if the exemption will continue beyond this time.</p>
<p>If you do get an exemption for pump size do you still need to report?</p>	<p>Yes, you are required to record and report your water take.</p>
<p>Golf Australia had made approaches to the Minister regarding exemptions for golf courses – what is the status of this?</p>	<p>Staff at the roadshow were not aware of this. Also note there is a new Minister now after the 2023 election.</p>

Question/Comment	Response
<p>We have a situation with a bore that has a pump that is 20 mm over the threshold. It pumps into a storage where we have another pump that pumps out for irrigation. Do I have to meter the pump from the bore – the flow is poor.</p>	<p>The metering rules apply at the point of take from the water source. Therefore, if the bore pump is above the size threshold, you would need to meter the bore.</p>
<p>This is a question I have asked before and not gotten a response – because we have had a very wet time are we able to carry over our allocations?</p>	<p>Rules regarding the carryover of allocations are set out in the Water Sharing Plans. Information about Water Sharing Plans can be found on the department's website at water.dpie.nsw.gov.au > plans and programs > water sharing plans.</p>
<p>We have had situations where irrigators have engaged a DQP and may have equipment ordered but because of delays with supply they have not yet had it installed. These irrigators are classified by NRAR as 'non-compliant'. That means that when public data is released it appears that we as irrigators are wilfully non-compliant which is not the case. Can this classification be changed to recognise that reasonable efforts are being made?</p>	<p>NRAR is aware of this issue and is looking at the way that this situation is classified. If you can demonstrate that you have engaged a DQP and are on the pathway to compliance, NRAR will consider this.</p>

Condobolin – 10 May 2023

Question/Comment	Response
<p>I have a lease over some Crown Land where my pump is located. The bore is on Crown Land. Can I claim basic landholder rights (BLR)?</p>	<p>Yes, as you are a lawful occupier, you have BLR domestic and stock rights,</p>
<p>What about where you have an easement to a river across someone else's property, are you entitled to BLR?</p>	<p>Yes, as you are a lawful occupier, you have BLR domestic and stock rights. A lawful occupier includes a person with a lease, easement or Crown land licence.</p>
<p>There are a lot of people around Lake Cargelligo wondering if they need to meter. Many have 50 mm pressure pumps.</p>	<p>You will need to install a meter. The size base exemptions do not apply in the Lachlan Regulated Water Source as the water sharing plan has a pre-existing metering condition in place.</p>
<p>A number of people, including around Lake Cargelligo, have properties or have bought properties with an irrigation licence and 4-inch pumps. They have now sold the irrigation licence but still have the same pump. 4-inch pumps are very common. If the requirement was less than 102 mm rather than 99 mm it would make a big difference. This would be a big problem around Lake Cargelligo.</p>	<p>Noted.</p>
<p>It is confusing. Why am I still getting threatening letters but I only have a licence for a 50 mm pump?</p>	<p>Letters go out to everyone. They are not intended to be threatening but to provide information to people to assist with compliance. The Water Group will look at the wording of the letters to see if any changes are required if they are being seen as threatening.</p>
<p>Duly qualified persons (DQPs) don't have the capacity to install equipment before the deadline. Does this mean we are in danger of action by NRAR?</p>	<p>Delays with equipment and backlogs for DQPs have been recognised as a problem. The advice is to engage a DQP and enter into a formal agreement with them even if installation may not occur until after the compliance deadline. You are encouraged to keep written records of all actions you have taken to comply. This will be considered by NRAR as making a reasonable effort to comply.</p>
<p>What is considered appropriate when you are making a work inactive? We have a diesel pump on a bore. Is it enough to remove the battery?</p>	<p>We would look to ensure that the discharge end of the pump was disconnected. Something more substantial than removing the battery would be required.</p>

Question/Comment	Response
<p>I have a pump that has to be repaired because of damage by flooding. If I make it inactive how long would it take to make active again?</p>	<p>It would only take a week or so to make active again. However, there is a cost involved in making a work both inactive and then active again. It may be a better option to remove the pump while it is being repaired. You would just be required to comply when the pump is fixed and re-installed.</p>
<p>On the WaterNSW slides regarding commercial use, how does the commercial user make sure they get the same BLR rights as the non-commercial user?</p>	<p>They would already have BLR rights. If they are using water for irrigation and BLR you just have to report what percentage of overall use was for BLR/domestic purposes.</p>

Wagga Wagga – 11 May 2023

Question/Comment	Response
<p>We have a caravan park with direct frontage to the Murray River. We have a stock and domestic licence with a 50 mm pump. We had been told previously that we do not need to comply but when we use online metering tool it says that we do.</p>	<p>This is likely because the Murray water sharing plan includes a pre-existing metering requirement which overrides the size-based exemptions in the non-urban water metering rules.</p> <p><i>This water user was advised to provide their water access licence (WAL) to WaterNSW representatives present at the meeting to discuss their specific situation.</i></p>
<p>We have multiple access points and many have been damaged by fire. We want to reinstate some of the pumps but want some advice on how to do that to make sure we are compliant.</p>	<p>WaterNSW staff can discuss the specifics of your situation in detail. It is important to note that there are multiple pump rules that may apply.</p>
<p>I am 13 kms west of Wagga Wagga and have little or no mobile access. Telstra tells me I should have coverage but I don't. How can I find out if I have sufficient coverage for telemetry?</p>	<p>The online telemetry blackspot identification tool is a good place to start. Sigsense also has a tool here today that can be used to show your coverage.</p> <p>It is important to note that the coverage required for telemetry is different to mobile coverage so although you may not have mobile coverage you may still have the coverage required for telemetry.</p>
<p>I have a stock and domestic licence and a 50 mm pump. Is it safe to say that I am exempt?</p>	<p>Not necessarily. There is an exemption available to small, low-risk stock and domestic water access licence holders who meet a criteria. More information on the exemptions is available on the department's website at water.nsw.gov.au/metering > what water users need to know.</p>

Yanco – 16 May 2023

Question/Comment	Response
If I have a licence just for stock and domestic do I need to comply?	Yes, although there is an exemption available to small, low-risk stock and domestic water access licence holders who meet a criteria. More information on the exemptions is available on the department's website at water.nsw.gov.au/metering > what water users need to know .
What if the direct frontage to the river is Crown Land – can you still have BLR?	You have access to BLR if you are a lawful occupier. A lawful occupier includes a person with a lease, easement or Crown land licence.
What about legacy stock and domestic water access licences that you don't really need?	You can discuss this with WaterNSW, one option may be to surrender that licence if you have BLR anyway. This would be a decision for individual landowners who have river frontage or overlay an aquifer.
How many MLs of water are available for irrigation in NSW?	There is information about the volumes for each water access licence in NSW on the NSW Water Register .
What if you are pumping from the river and want to fill up your dam for stock and domestic use?	This would be considered a mixed-purpose use. You would notify WaterNSW of the amount of the total water use that is being used for stock and domestic purposes. This would be taken off your overall use so it doesn't come off your irrigation allocation.
What is the delay in getting a duly qualified person out to your property now?	It is acknowledged that there are some delays in getting DQPs onto properties. Some DQPs are reporting 3-6 months, others 1-2 months. NRAR has stressed that you should contact one or more DQPs prior to the deadline and at least lock in a time for them to visit your farm.
Will you get fined if we can't comply by the deadline?	NRAR has stressed that it will consider reasonable efforts to comply. If you haven't done anything you may be at risk. At the least, documented efforts to engage a DQP should be provided.

Question/Comment	Response
<p>What is the allowable volume for stock and domestic use?</p>	<p>Under the <i>Water Management Act 2000</i> there is not a volumetric limit for BLR stock and domestic use, it is based more on what is reasonably required to meet the needs of your household and stock. A volumetric limit does apply to a stock and domestic water access licence.</p>
<p>Is there a stock and domestic component included in general security licences?</p>	<p>No. Basic landholder rights water is in addition to your general security licence. You should notify WaterNSW about the component of your overall use that is for BLR. You may only access BLR if you have frontage to the water source or overlay an aquifer.</p>

Deniliquin – 17 May 2023

Question/Comment	Response
<p>Irrigation should never have been put on these bores in the first place because they were put in place to lower salinity. It was environmental issue from back in the 80s to install shallow groundwater pumps to lower the groundwater. Landowners are having to meet costs of these shallow bores when they are not really irrigation bores they are to lower the groundwater. There should be an exemption for these bores.</p>	<p>Noted. The Water Group commits to investigating this issue further and recognises this as a significant issue for water users in this area.</p>
<p>If you have the telemetry exemption, do you need to have a meter and also a data logger?</p>	<p>In a telemetry blackspot exemption you just need to have a meter and not a LID/data logger.</p> <p>Further information on this exemption is available on the department's website at water.nsw.gov.au/metering > what water users need to know.</p>
<p>If you were to make your licence inactive you don't have to forfeit your water entitlements but if you change from an irrigation licence to stock and domestic you do lose your water entitlements?</p> <p><i>Note: Attendee had a form that said you did have to surrender your entitlements. WaterNSW will follow up.</i></p>	<p>This is a couple of separate issues.</p> <p>Making a work inactive pauses your water supply work approval but it doesn't have an impact on your water entitlements. You can continue to trade etc.</p> <p>A BLR exemption does not change your approval you don't have to amend your approval if it is only used for BLR.</p> <p>If you want to use the work solely for BLR you would be exempt. You wouldn't need to mark it as inactive for it to be exempt. If it is solely used for BLR there is no need to install a meter. That exemption is not a temporary exemption, it is a permanent exemption based on the use of the work.</p>
<p>What about high water table and pumping? This is a big issue in this area. We pump when the water table is high to mitigate environmental impacts – if we don't pump there will be salinity issues.</p> <p>The rules seem too broad and don't recognise the circumstances here around the high water table and salinity.</p>	<p>There is currently no exemption in the non-urban water metering rules that apply to environmental exemptions. This issue will be taken back by the Water Group and discussed to see if there is a solution that does not negatively impact people who pump groundwater for environmental purposes.</p>
<p>Spearpoints are common in this area and they have not been addressed today.</p>	<p>Spearpoints are included in the non-urban water metering rules so unless an exemption (such as the BLR exemption) applies you would need to comply.</p>

Question/Comment	Response
<p>What if you have 3 spearpoints that are each under 200 mm?</p>	<p>Spearpoints are required to have metering equipment, regardless of size, unless an exemption applies, such as the BLR exemption.</p>
<p>We have 2-3 sites close together do we need three separate meters.</p>	<p>If you can manifold the sites through pipe works and there is no off-takes so that all water that is running through the pipes goes through the meter, you can have one meter for multiple works.</p>
<p>Why am I being forced to pay \$10,000 to put another meter on just because you blokes don't have to pay someone to read the meter. If you want the metering why are we paying for it?</p>	<p>The regulations have been made and include what the responsibilities of water users are. We are now past the stage of debating the details of the reform. It is in place and we are now trying to provide information to people to assist you to comply.</p> <p>Part of the process today is to answer questions. We are encouraging you to talk with the agency representatives today about your individual circumstances.</p>
<p>We have a stock and domestic licence and a high security water licence of two units with a 50 mm line from Murray Irrigation. Can I transfer the two units to my stock and domestic licence?</p>	<p>If you have a pre-existing metering requirement then you cannot access the size exemptions.</p> <p>You may be able to obtain a stock and domestic access licence exemption if you meet the specific criteria.</p> <p>You are encouraged to talk with the Water Group to discuss your situation.</p>
<p>This whole process has been ugly and confusing. We have been talking about pumping groundwater in high water table situations as something that should be addressed in the regulations for years.</p>	<p>Noted.</p>
<p>In this area there are hundreds of spearpoints, some are used and some are not. They are not for irrigation purposes but for lowering the water table.</p> <p>A lot of people have said they are not going to bother with the metering requirements as they feel it should not apply to them. It is not for irrigation it is only for lowering the water table. What are the consequences?</p>	<p>The water table situation in this area is noted and that is something that the Water Group will take back for consideration.</p> <p>NRAR noted that their compliance action will focus on the high volume water users. However, even for lower volume users, if the rules apply to you and you choose not to comply you are running the risk of facing some form of compliance action.</p>
<p>For the publicly held fleet, when WaterNSW is validating on the ground and what is on the ground is different to the works approval – whose responsibility is it to amend the approval?</p>	<p>It is the landowner/water user's responsibility to amend the approval because the work approval and the pump are owned by the landowner.</p>

Question/Comment	Response
<p>We have a spearpoint that we meter and we also have a BLR. Because we have a spearpoint there does that mean we have to meter the BLR?</p>	<p>If you are using the spearpoint for commercial purposes but you also take your BLR from that spearpoint then you need to record your BLR on a monthly basis so that can be taken off your water bill. If you are not going to take BLR for a period you can also notify WaterNSW.</p> <p>If you are taking BLR through a completely separate work and the BLR is the sole purpose of this work, then the BLR work does not require a meter.</p>
<p>To make works inactive, you have to pay a fee. When the water table rises we will have to pay a fee again to make the works active so that we can retain our farm in a condition that keeps it viable to farm.</p> <p>The water we are pumping used to be called environmental water because it was to lower the water table, now it is being called commercial.</p> <p>Is there any classification currently that would enable this water to be considered environmental water and exempt from metering and the costs involved?</p> <p>We put it on pasture paddocks (mixed with irrigation water) because we have to put it somewhere.</p>	<p>There is currently no environmental exemptions.</p> <p>It will depend on what you are using the water for – if it is being used for irrigation it will fall under the non-urban water metering rules.</p> <p>There is some overlap between the environmental and commercial use but the Water Group will look into this issue.</p>
<p>Is there any class of water use or category of exemption for environment purposes?</p> <p>We pump the groundwater and then mix it with irrigation water so it can be used on crops, etc.</p>	<p>No. The Water Group will look into the situation here with the high water table and see if there are any options.</p> <p>One of the complexities may be around once pumped how that groundwater is used.</p>
<p>These issues have been raised by us for years and the department hasn't listened. It is surprising these issues are seen to be new because they have been raised for many years.</p> <p>Spearpoints use 1-2 ML/day – part of it is a commercial use but they are very small volumes.</p>	<p>Noted.</p>

Question/Comment	Response
<p>NRAR speaks of focussing on high volume water users, rather than lower volume users. What is the definition of a high volume water users?</p>	<p>To assess and determine high and low-volume works in each region, NRAR looks at factors such as water entitlement held, trades and water usage analysis.</p> <p>As a risk-based regulator, it's important for NRAR to engage with water users in meaningful ways.</p> <p>By separating low-volume/low-risk from high-volume/high-risk water users, NRAR can decide which water users get a visit from the outreach teams and which get a visit from compliance officers.</p> <p>Either way, NRAR is a fair but firm regulator, and we consider each situation on its merit. We prefer to educate and empower water users to comply with the rules, but we do act decisively if people are wilfully and recklessly disregarding the law.</p>
<p>The Murray–Darling Basin Authority in Canberra, in terms of enforcement, what is the relationship between the Directorate and NRAR? Who do we interact with?</p>	<p>NRAR's focus is working with water users' compliance on the ground.</p>
<p>I have contacted a DQP last year, then again this year and can't get a response. I have recorded this in my Farm Diary – is that sufficient?</p>	<p>No. We encourage people to have either a contract or some form of written confirmation (can be email) from a DQP that you have contacted them and they have a time to inspect your property.</p> <p>It is suggested you try multiple DQPs if you can't get a response from one.</p>
<p>There is an issue with retention of DQPs. The training course isn't adequate. There is a lot of people that get their licence, maybe try one job and then get out of it.</p>	<p>Noted.</p>
<p>If you contact a DQP and they say they'll get back to you how does that information get back to NRAR or someone else so that they know we have tried.</p>	<p>NRAR suggests that a phone call is not enough, get something in writing and keep your records such as confirmation of booking, contract or similar.</p>
<p>We have eight feet of water over our pump at the moment – how is a DQP going to get to it?</p>	<p>If your metering equipment is under water and is damaged you can report to WaterNSW under the section 91i form.</p>

Question/Comment	Response
<p>If a work is made inactive, why is it that we are still required to pay the one part tariff? We are not using it or getting any benefit from it.</p>	<p>If the work has been made inactive, the water user is billed under the one-part tariff for the full entitlement of their water access licence (WAL) water sharing plan unit shares. There are no metering or usage charges applied to the one-part tariff. This is because there is no water take and meter readings which required under the two-part tariff.</p> <p>If water users wish to retain their access licence, they need to consider their individual requirements and decide which option is best. In some cases, it may be optimal to install compliant metering equipment to be financially beneficial for them in the future.</p>

Mildura – 18 May 2023

Question/Comment	Response
<p>I have small acreage with a water access licence. I have absolute water frontage. It was used for agriculture but not anymore as it is no longer viable. My problem is that although I don't operate any commercial farming it looks commercial and still has all the irrigation infrastructure in place. Do I need to meter?</p> <p>What is the proof that I require to demonstrate that I am not commercial and only a basic landholder rights (BLR) water user?</p> <p>Is my income tax assessment that shows income enough?</p>	<p>If you are not using water for a commercial purpose but just for your home and you are accessing water directly from the river (your property fronts the river or creek) then you are likely to be considered BLR and not required to meter.</p> <p>NRAR stresses the importance of documentation. An income tax return with zero income from crops may be helpful.</p> <p>In addition, a site visit would confirm the extent of irrigation and whether or not the farm was performing a commercial function.</p>
<p>When taking BLR do you need to report it? Why is the onus on the water user to report BLR?</p> <p>Can I still have a water access licence and temporary trade?</p>	<p>If the work is used to take both BLR and licenced water take, you will need to comply with the metering rules and report your water take. It is the water users/landowner's responsibility to report their BLR use by the 14th of each month to WaterNSW. It is in the water user's interest to do so as BLR usage is deducted from your account.</p> <p>If the work is used purely for BLR you don't need to meter or report your usage.</p> <p>Yes, you can still have a water access licence and temporary trade.</p>
<p>I am an ex-irrigator with a three acre property on the Darling River. I have an 8 ML stock and domestic licence. The pump is 32 mm. Am I exempt?</p> <p>My problem is not to have to meter but to have to spend \$7-8,000 to comply.</p>	<p>Suggestion to sit down with agency representatives today to discuss your specific and look at your licence and go through metering guidance tool.</p>
<p>In situation where there are two pumps – one is used for BLR and the other is used to irrigate an orchard. Is it supposed to be one meter?</p>	<p>If a separate pump is solely for BLR then no meter is required on that pump. If the two pumps are manifolded then you may need to meter if you cannot separate the flow through a meter.</p>
<p>There is real confusion about when you need a local intelligence device (LID)?</p>	<p>All meters must have a local intelligence device (LID) installed; the LID records water take data. Surface water works 200 mm and greater must have the LID connected to telemetry to automatically transmit water data to the governments data acquisition service (DAS).</p>

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<p>The stock and domestic exemption is until December 2024. What if you have a general or high security licence allocation with those works then it has to be metered because you can't separate the two?</p>	<p>This exemption is for small, low risk stock and domestic water access licence holders who meet a strict criteria. Details of exemptions are available on the department's website at water.nsw.gov.au/metering > what water users need to know. We encourage you to speak to the Water Group or WaterNSW to discuss your specific situation.</p>
<p>I am a pensioner with a one and half acre of land that already has a meter. I have 2 ML that I use for lawn and garden. I don't have direct access to the river.</p>	<p>We can talk later about your specifics to give you detailed advice but in this situation, it appears that you would be able to apply for the small, low risk stock and domestic water access licence exemption for your stock and domestic use. You would not be BLR as your property is not directly accessing the river or creek where you are drawing your water from.</p> <p><i>Note: This participant spoke individually with agency representatives in the open session and it was confirmed that a meter was not required.</i></p>
<p>In the Darling there are a lot of private diverters. They are irrigators but not big ones – irrigation is not their main business. When Government was funding the meters were told they would not need to meter and are now being told they do need it and being confronted with large bills. Lots of confusion and frustration. People are starting to panic about the compliance dates.</p>	<p>Noted as a statement.</p> <p>WaterNSW suggested that they meet with this representative of irrigators to discuss an approach to seek answers to the questions that the diverters have.</p>
<p>What is the cost of telemetry per year?</p>	<p>It is \$238.04 per year which is set by IPART. The \$975 subsidy covers telemetry costs for four years.</p>
<p>We have 4-5 elderly people living on Gul Gul Creek. There are three stock and domestic licences. 36 ML water right, 3 of which is stock and domestic. We no longer grow commercial crops. Just use stock and domestic.</p>	<p>WaterNSW has sent this participant an email that has said they do not require to meter as long as use is stock and domestic and for horticultural purposes.</p>
<p>I have direct river access and just pump water for my house and garden. Do I need to meter?</p>	<p>No. From your description it sounds like you would be using water under basic landholder rights but you can discuss your situation with the Water Group and WaterNSW staff.</p>

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<p>When do you have to get your equipment recalibrated?</p>	<p>Your validation by a duly qualified person (DQP) lasts for five years. It will have to be revalidated in situ every five years, unless it is an open channel where validation is required every year.</p>
<p>Is there a size limit on pipes that are used for BLR?</p>	<p>No. Not in NSW.</p>
<p>I have been to three meetings to try to get answers. We have several small properties that are former agricultural land – were once commercial. We irrigate with five water access licences (WALs). Two are government and the other three are smaller, private with pumps between 50 and 100 mm that are used for BLR and stock and domestic and have mechanical meters from the 1990s. We don't have town water and we don't have bore water. We get all our water from that pumping system that was put in place when the land was opened up after the 1956 flood.</p> <p>Do those pumps that are on the Gulgul Creek that are up to 125 mm or 150 mm require a meter or new meters?</p> <p>NRAR came out and they were very confused but verbally they said I didn't have to meter. I really need something in writing to tell me if I need to meter or not. We just need to know.</p> <p>All my properties are linked so that all water is linked to one pump so may have to meter that pump? I have had letters that I am over allocation but they haven't taken into account that the properties are linked.</p> <p>Concern that if I have to set up three meters and three LIDs to comply I am going to be up for \$30,000 for a pretty small amount of water.</p>	<p>If the three pumps are used solely for BLR then they should not require a meter. BLR can still apply when you have an access licence nominated against that work. It is based on the use.</p> <p>Water Group staff will meet with this person individually to look into this situation in detail.</p> <p>Government owned meters are WaterNSW's responsibility so they will be made compliant by WaterNSW.</p>
<p>Regarding information on the portal – does that report back to iWAS and also as a leaseholder how do I get access to that information if I am not the property owner?</p>	<p>Once connected to telemetry you are connected to the data acquisition service (DAS). WaterNSW does a quality check on the configuration of the LID – put it into iWAS. If you are not seeing you are compliant in iWAS it may be because we have a bit of a backlog in processing which is being addressed.</p> <p>Will have to check the data access rights for leaseholders and report back.</p>

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<p>Want to clarify the self-reporting requirements if you are just using for stock and domestic purposes?</p>	<p>It is on the BLR slides. Would suggest if there is any confusion about reporting book a session with WaterNSW metering specialist.</p>
<p>I have a 80 mm pump with an old meter. Do I have to meter? What if a person is not in a financial position to purchase the equipment required to comply?</p>	<p>Would have to put a meter on it only if you have a pre-existing metering requirement. You may have to upgrade your meter or possibly transition your existing meter by installing a LID. A DQP would need to advise you on that.</p> <p>There are some financial assistance programs available and tax concessions may be available. NRAR will consider contributing factors to people's capacity to comply there is some discretion that can be applied. We would encourage people to take the steps they can to comply.</p>
<p>We have reports about the difficulty in getting DQPs out to more remote areas in Western NSW such as around Menindee. Is there any assistance or subsidy available from Government to incentivise DQPs to get out to water users in remote areas?</p>	<p>No. The Water Group has created the Virtual Marketplace tool to help people identify DQPs and is subsidising training for Certified Meter Installers.</p> <p>Another option is for water users in remote areas to get together and contact a DQP so that a DQP could cover multiple properties on a single trip to enhance the viability of the trip for them.</p>
<p>The meters are privately owned. I want to confirm that they can be on-sold or can be relocated to other properties. If you install something now and it is no longer required in the future you can sell it.</p>	<p>This is correct.</p> <p>If you move you would have to engage a DQP and revalidate.</p>
<p>How long does an exemption last if you make something inactive? Are there any assurances that your request to make something active again may not be granted if circumstances change?</p>	<p>The cost is around \$603.50 to make something inactive regardless of the timeframe. It is not an annual fee. It will then cost another \$562 to activate again.</p> <p>There is no precedent for that but it is difficult to speak on behalf of future decisions that governments may make.</p>