



Pioneer Valley Water Co-operative Limited.

A co-operative formed under the *Cooperatives Act 1997*.

ABN: 55 322 373 770

PO Box 275
(Level A, 120 Wood Street)
Mackay QLD 4740

Ref: 10_018_10
13 January 2020

Attn: Leanne Barbeler - Executive Director Water Markets

PO Box 15216 City East
Queensland 4002 Australia

Ref: Submission regarding Non-Urban Water Measuring

Dear Leanne,

Pioneer Valley Water Co-operative Limited (PVWater) is a small not-for-profit service provider, distributing water for irrigation purposes to water allocation holders in the Pioneer River Water Supply Scheme, and maintaining irrigation infrastructure owned by water allocation holders through their membership of Pioneer Valley Water Mutual Co-operative Limited (PVMutual). PVWater's offices are located in Mackay, North Queensland.

We agree that Queensland's regulatory frameworks for water measurement and compliance be effective, efficient and affordable. However we are concerned that:

- mandatory introduction of AS4747 meters will financially impact irrigators already moving from production enhancing irrigation to crop survival irrigation due to crippling water and electricity price hikes from Government owned monopolies, SunWater and Ergon.
- AS4747 requires users to replace mechanical meters with electronic meters which cost three times more to purchase and have an effective life three times shorter than mechanical meters, a net impact of nine times the cost.
- there is an additional cost burden associated with maintenance of electronic meters installed in flood affected areas and this will only be exacerbated by proposed requirements for telemetry. In many places in the PV Water Area we do not have Network coverage and even 3G does not work so mandatory installation of telemetry will be ineffective.
- not enough consultation has taken place around resource planning to ensure practical considerations like availability of meters, sufficient numbers of qualified installers, calibration facilities, hydrogeologists and licenced technicians to not only install but maintain these meters. Again this will only be exacerbated by a requirement for telemetry.
- in the event that we do need to transition from mechanical to electronic AS4747 rated meters then this should be on an as-failed basis especially in schemes such as Pioneer Valley where there is lower risk on available water resources
- the Queensland Government will move beyond the requirements of AS4747 adding more red and green tape to an already overburdened industry.

PV Water maintains close contact with our irrigators through quarterly meter reading and infrastructure management. The mechanical meters are practical, efficient and effective in flood prone areas and we see no benefit to offset the unnecessary cost of changing to electronic meters.

Yours faithfully,

STEVEN FORD
GENERAL MANAGER.