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Proposed National Environmental Standard for Water Measuring Devices

Submission to the Ministry for the Environment
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Background to IPENZ

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. It has approximately 10,000 Members, including a cross-section from engineering students to practising engineers to senior Members in positions of responsibility in business. IPENZ is non-aligned and seeks to contribute to the community in matters of national interest giving a learned view on important issues, independent of any commercial interest.

Executive Summary

IPENZ strongly supports the development of initiatives designed to promote water conservation in New Zealand. IPENZ considers that the management of water allocation and use cannot be effective without robust consumption data.

We do not seek to meet with the Ministry to discuss this submission further, but we are happy to provide further explanation of the issues raised here.

Submission

The following are our specific responses to the discussion points contained in the draft strategy.

1. *Scope of the proposed National Environmental Standard and exemption of water takes*
   IEPNZ generally agrees with the proposed scope – however we consider it could go further.

   Water takes would not be so high if local authorities reduced the quantity of unaccounted water. We recommend that more consideration be given to the causes of unaccounted water and dealing with these urgently so that New Zealand can improve water conservation.

2. *Minimum specifications for water measuring devices*
   We consider that ± 5% is an appropriate accuracy for water measuring devices and agree with the other proposed minimum requirements.

3. *Installation and maintenance requirements*

Rather than introducing an indiscriminate requirement that water measuring device accuracy be independently verified every five years, we recommend that consideration be given to allow local authorities to require such action at their discretion. For example, in view of the proposal that all water measuring devices are required to have data-storage capability, an algorithm could identify changes in usage data and highlight if the water measuring device is inaccurate and needs testing, servicing or replacing.

We also consider that the NES should cite relevant New Zealand or international Standards where appropriate, for example the BS 1042 series.

4. *Recording of water take volumes*

We consider that the relevant regional authorities should set the interval for recording water take volumes, rather than applying an indiscriminate interval across the whole of New Zealand, as different takes are subject to different pressures. This would ensure that high reporting obligations are only applied in areas where it is considered necessary by the authority with primary statutory responsibility for water resource management.