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Stuart McPherson  
Manager, Technical  
South Australian Water Metering Code – Issues Paper  
Essential Service Commission of South Australia  
GPO Box 2605  
Adelaide SA 5001

Dear Mr McPherson,

Thank you for the opportunity to provide a submission to the South Australian Water Metering Code - *Issues Paper*.

The National Measurement Institute (NMI) is Australia's peak measurement body responsible for administering the *National Measurement Act 1960* (the Act) and subordinate regulations.

In reference to the “Standards and Compliance” section of the *Issues Paper*, I would like to take this opportunity to clarify the context and application of the pattern approval standard, NMI R 49 *Water Meters Intended for the Metering of Cold Potable Water and Hot Water*.

NMI R 49 is an adopted and amended version of the International Recommendation OIML R 49, published by the International Organisation of Legal Metrology (OIML). The amendments were developed in consultation with the Australian water industry, and are listed in the preliminary pages of NMI R 49. NMI R 49 specifies the metrological and technical requirements for the pattern approval of water meters used for trade in Australia.

In order to be used for trade, the Act requires measuring instruments to be pattern approved and verified. In the case of water meters, verification requirements are specified in NITP 14 - National Instrument Test Procedures for Utility Meters.

It is important to note, however, that pattern approval and verification is not currently mandatory for all sizes and classes of water meter. The *National Trade Measurement Regulations 2009* provide an exemption from pattern approval and verification requirements for certain sizes and classes of water meters.

Currently pattern approval and verification requirements are only mandatory for cold water meters with a maximum continuous flowrate of equal to or less than 4,000 litres per hour, installed on or after 1 July 2004.

NMI is currently proposing to extend the requirements of pattern approval and verification to cold water meters with a maximum continuous flowrate of equal to or less than 16,000 litres per hour. At present, the proposed implementation date would be for water meters installed on or after 1 July 2014.

Pattern approval and verification requirements remain voluntary for all other sizes and classes of water meter.

Thank you for taking the time to consider this submission and I would welcome any feedback you may have.

If you would care to further discuss the application of the Act, regulations and relevant water meter standards, please do not hesitate to contact me at the details below.

Best Regards,

A handwritten signature in black ink, appearing to read 'Alex Winchester', with a long horizontal flourish extending to the right.

**Alex Winchester**

Policy Officer – Legal Metrology Policy  
National Measurement Institute  
Department of Industry

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