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To whom it may concern,

Consultation draft: Regulatory framework for local water utilities Replacing the Best-Practice Management for Water Supply and Sewerage Guidelines March 2022

Thank you for the opportunity to comment on the above draft guidelines.

In September 2020 the NSW Auditor-Generals Office (AGO) published a performance report titled "Support for regional town water infrastructure". One of the clear recommendations from this report was to "Develop and implement a clear policy and regulatory approach to overseeing and supporting LWUs. It should do this in consultation with the LWU sector."

It is our considered view that the intent of the recommended regulation (in the AGO report) was to address the shortcomings of DPIE in supporting Local Government. However, the draft regulation proposed by DPIE above, seeks to regulate Local Government, not regulate the practices of DPIE as the AGO intended. Accordingly, we suggest the premise of the proposed "Regulatory framework for local water utilities Replacing the Best-Practice Management for Water Supply and Sewerage Guidelines March 2022", is flawed. As proposed, it will increase the burden on LWU and do little to change the practices of DPIE identified by the AGO.

Further, a submission is attached which was developed cooperatively across the membership of the Central NSW Joint Organisation (CNSWJO), which comprises the Local Government Areas of Bathurst, Blayney, Cabonne, Cowra, Forbes, Lachlan, Oberon, Orange, Parkes, Weddin, and Central Tablelands Water. Parkes Council fully supports this submission.

Yours sincerely,



Kent Boyd PSM
General Manager