



Attention: Ms Rachel Blackwood  
Assistant Secretary, Spectrum and Telecommunications Deployment Policy Branch  
Department of Infrastructure, Transport, Regional Development and Communications  
GPO Box 594  
Canberra ACT 2601

9 April 2021

Dear Ms Blackwood,

**Submission: Amendments to the Telecommunications Carrier Powers and Immunities Framework – Tranche One**

We write in response to the call for submissions on the Australian Government's *Telecommunications powers and immunities framework*. Thank you for the opportunity to comment. The Water Directorate is the peak industry body for 89 of 90 (98%) of local government owned water utilities (LWU's) in regional NSW. Further information about us can be found at: <https://www.waterdirectorate.asn.au/AboutUs.aspx>

The NSW Water Directorate has been an active member of the Powers and Immunities Reference Group (PIRG) since 2017, advocating for improvements to the framework for a number of years. We continue to have significant concerns that the location of telecommunication equipment on landowner assets, including critical water infrastructure, has hindered access for water utility operations, created additional security risks, and compromises the ability for water utilities to provide safe drinking water.

*Regional Water Infrastructure in NSW at a glance*

Regional water infrastructure in NSW has the following attributes 'at a glance':

*Table 1 - Features of the regional NSW urban water industry*

• 92 Local Water Utilities (LWU's)	• 1.85 million population served in 890,000 homes and businesses
• 350 water supply schemes	• 300 sewerage schemes
• 49 recycled water schemes	
• 312 GL per annum of water supplied	• 160 GL of sewage treated
• \$28 Billion total replacement cost of assets	• \$1.5 Billion in annual revenue

The data indicates extensive critical infrastructure supporting the provision of essential water services across regional NSW. A list of our member water utilities is attached to this letter.

NSW Water Directorate has collaborated and partnered with the Water Services Association of Australia (WSAA) and the Queensland Water Directorate (*qldwater*) due to the common issues at the interface between telecommunications and water infrastructure across Australia. **NSW Water Directorate is a signatory to the WSAA submission on behalf of the Australian water industry and fully supports the content and intent of WSAA's submission.**

We also acknowledge a meeting between WSAA, Qldwater and the NSW Water Directorate and departmental representatives as part of the Tranche 1 consultation process on 16

March 2021. NSW Water Directorate records its concern as a peak body representing 89 local water utilities that it should have to encourage its 89 members to make their own submissions to add weight to our concerns. NSW Water Directorate represents many small water utilities in regional NSW. The Department has adopted a consultation timeframe which does not allow for full participation by impacted water utilities. Taking this approach is not efficient and would not be in the interests of any of your stakeholders.

We commend WSAA and Qldwater for consolidating feedback from peak water industry bodies and member water utilities from around Australia, saving the Department significant effort in reviewing submissions, supporting an efficient consultation process.

We ask the Department to confirm that a consolidated approach applied by a group of peak industry bodies will be given appropriate weight in this reform process to avoid the need for the NSW Water Directorate to ask its 89 members to make individual submissions that would essentially provide the same concerns about impacts on essential water services.

NSW Water Directorate confirms that this submission can be made public.

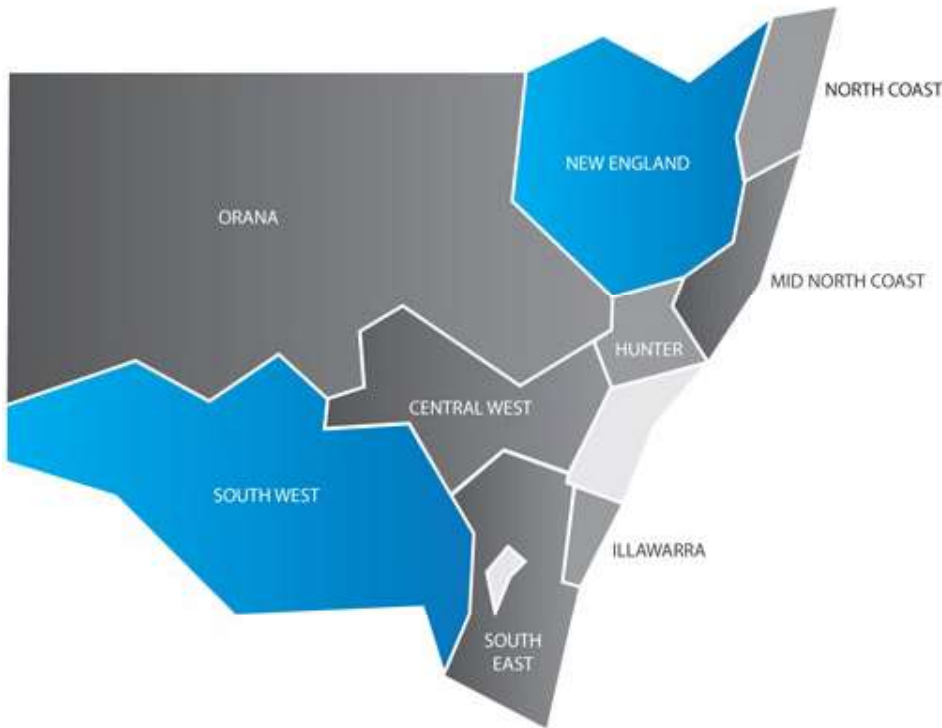
Please direct any enquiries about this letter to the [REDACTED]

Yours sincerely,

[REDACTED]

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## NSW Water directorate members



### Central West

Bathurst Regional Council  
 Blayney Shire Council  
 Cabonne Shire Council  
 Central Tablelands County Council  
 Cowra Shire Council  
 Forbes Shire Council  
 Lachlan Shire Council  
 Lithgow City Council  
 Oberon Council  
 Orange City Council  
 Parkes Shire Council  
 Weddin Shire Council

### New England

Armidale Regional Council  
 Glen Innes Severn Council  
 Gunnedah Shire Council  
 Gwydir Shire Council  
 Inverell Shire Council  
 Liverpool Plains Shire Council  
 Moree Plains Shire Council  
 Narrabri Shire Council  
 Tamworth Regional Council  
 Tenterfield Shire Council  
 Uralla Shire Council  
 Walcha Shire Council

### South East

Bega Valley Shire Council  
 Eurobodalla Shire Council  
 Goulburn Mulwaree Council  
 Queanbeyan-Palerang Regional Council  
 Snowy Monaro Regional Council  
 Upper Lachlan Council  
 Yass Shire Council

### Orana

Bogan Shire Council  
 Bourke Shire Council  
 Brewarrina Shire Council  
 Central Darling Council  
 Cobar Shire Council  
 Coonamble Shire Council  
 Dubbo Regional Council  
 Gilgandra Shire Council  
 Mid Western Regional Council  
 Narromine Shire Council  
 Walgett Shire Council  
 Warren Shire Council  
 Warrumbungle Shire Council

### North Coast

Ballina Shire Council  
 Byron Shire Council  
 Clarence Valley Council  
 Kyogle Council  
 Lismore City Council  
 Richmond Valley Council  
 Rous County Council  
 Tweed Shire Council

### Mid North Coast

Bellingen Shire Council  
 Coffs Harbour City Council  
 Kempsey Shire Council  
 MidCoast Council  
 Nambucca Shire Council  
 Port Macquarie-Hastings Council

### South West

Albury City Council  
 Balranald Shire Council  
 Berrigan Shire Council  
 Bland Shire Council  
 Carrathool Shire Council  
 Cootamundra-Gundagai Regional Council  
 Edward River Council  
 Federation Council  
 Goldenfields Water County Council.  
 Greater Hume Council  
 Griffith City Council  
 Hay Shire Council  
 Hilltops Council  
 Junee Shire Council  
 Leeton Shire Council  
 Lockhart Shire Council  
 Murray River Council  
 Murrumbidgee Council  
 Narrandera Shire Council  
 Riverina Water County Council  
 Snowy Valleys Council  
 Temora Shire Council  
 Wagga Wagga City Council  
 Wentworth Shire Council

### Illawarra

Shoalhaven City Council  
 Wingecarribee Shire Council

### Hunter

Muswellbrook Shire Council  
 Singleton Shire Council  
 Upper Hunter Shire Council