

Email address	[REDACTED]
Contact Details	
Name of respondent	Graham Kennett
Postcode	2474
Contact phone number	[REDACTED]
Email	[REDACTED]
Are you an individual or representing an organisation?	Organisation
Organisation or Business Details	
Name of Organisation	Kyogle Council
Who are you representing?	Government
Government Organisations	
What level of government organisation are you?	Local
Proposed changes to recording and reporting requirements	
The draft public exhibition regulation includes proposed changes to the recording and reporting mandatory conditions. Do you have any comments on the recording and reporting requirements?	Yes
If yes, please include your comment below and indicate whether it relates to works	C. required to have a meter, data logger and telemetry - clause 244 of the regulations
	Local Water Utilities are already required to complete reporting to a number of departments on water extraction, consumption and reuse. Including LWUs in these additional reporting provisions does not provide any benefit in terms of the objectives

Please provide your comments on the proposed recording and reporting requirements

and purpose of the legislation. LWUs are not the problem that needs to be addressed, and LWUs generally already have higher levels of reporting, monitoring, metering and telemetry/SCADA systems than any other water users and are part of Government. The changes to the regulation should simply recognise that government owned LWUs are regulated through other legislation and provide exemptions for these entities rather than trying to add to the existing system that is not broken.

Draft public exhibition regulation

Do you have any other comments on the draft public exhibition regulation?

Yes

If yes, please provide your comments.

The draft provisions around duly qualified persons is unnecessarily restrictive and fails to recognise that many Local Water Utilities already have technical staff or contractors that are approved by the meter manufacturers that can perform the tasks required and to a higher standard than those currently on the industry approved list of DQP. There is also the matter of the complex telemetry and SCADA systems in use by most LWUs and the need to ensure that these remain secure as the extraction from the water source cannot generally be separated from the system monitoring drinking water distribution to many thousands of customers and any requirement for connectivity with these systems for reporting that might compromise the security of these drinking water systems should be scrutinised in great detail before being placed in any form of regulation or legislation. In this day and age cyber security is a major concern for critical infrastructure such as drinking water supplies. Again, these issues support the argument for exempting LWUs from these provisions as a reflection of the fact that LWUs are not the problem, are a part of government, and are already regulated at a higher level of scrutiny, reporting and monitoring than all other water users. There should simply be exemptions for the local government owned LWUs under the proposed regulations.