



Gympie Regional Council Review of Water and Sewerage Report

Prepared for: Chief Executive Officer, Gympie Regional Council

Final Version 1.2

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1.0 EXECUTIVE SUMMARY

The Chief Executive Officer of Gympie Regional Council (GRC) engaged *AQUA projects* (AQUA) to undertake a comprehensive review of its water and sewerage business, with a view to ensuring it is meeting the needs of all stakeholders into the future. The responsibility of a Water Service Provider (under Queensland Legislation) combined with recent environmental breaches have been the catalyst for undertaking this review and reflects Council's commitment to providing the best possible service. The review encompassed the management of both people and infrastructure.

The review addressed the following questions:

- The optimum strategy for the water and sewerage business now and into the future, including trade waste charging;
- Recommended structure;
- Recommended skill and staffing levels.
- Areas where performance is deficient and the necessary remedies.
- Key performance indicators that are practical and truly reflective of the overall performance of the business and reflect best practice.
- The cause of recent environmental breaches and remedies if applicable.
- Any matters which expose Council to unacceptable risk.
- Any other matters which impact on the ability to meet industry best practice.

Interviews were undertaken by Robin Hagen and Brad Cowan of *AQUA* with a cross-section of GRC management and staff as well as external industry and regulator stakeholders. Current performance was assessed against industry practise and trends for similar water and sewerage undertakings.

The main issues impacting the water and sewerage business were identified as:

- Little evidence of strategic planning
- Poor long term performance of Environmental License KPIs
 - The treatment Plant failures had been obvious to Regulator for two years and no real change on performance over that time.
- Absence of any useable Safety Performance information – 'ignorance' is no defence.
- No evidence of robust Capex/Opex 'trade off' decision making; especially for Renewals projects [annual Capital spend \$11M]
 - Necessary and efficient maintenance practises (OPEX) seemed to be too easily replaced by new construction CAPEX
- No evidence of robust options development and assessment (project management) [annual Capital spend \$11M]
- Ad-hoc asset management especially for the passive assets (\$190M)
- Staff confused about roles and accountability
- System performance poorly recorded
- Communication between GRC silos is poor

The review questions were addressed and corrective strategies prioritised. These were summarised into the following Key Recommendations (with Options for implementation) identified for consideration by Gympie Regional Council including;

- Option A - Form a Commercialised business unit within GRC namely;
 1. GRC complete the implement of the 'user pays' principle across Council.
 2. GRC form a Commercialised Water and Sewerage business unit (as per section 28 of the Local Government Regulation 2012) with responsibility to deliver safe, reliable and environmentally friendly water and sewerage services to its customers.

3. Recruit and resource the Business Unit Senior Management team.
4. Implement suitable customer, financial, asset management, quality, safety, environmental and compliance management systems; to ensure the business unit's long term viability and regulatory compliance.
5. Implement a formal Project Management framework across Council.
6. Services provided to the Water and Sewerage business unit by other parts of GRC be formalised and managed through Service Level Agreements.
7. Implement a governance framework to ensure transparency and accountability for all decisions that influence business unit performance and regulatory compliance.
8. Develop and Implement a Change Management Plan (including Relationship Management) as part of the Implementation Plan for the GRC approved strategies in this report.

:

- Option B - Commercialised business unit with other WBBROC councils.
- Option C - Commercialised business unit with Unitywater.
- Option D - Commercialised business unit with an industry partner.

2.0 BACKGROUND

2.1 *Introduction*

Gympie Regional Council provides water and sewerage services to around 30,000 customers. The water and wastewater network of about 850km has 12,300 water connections and 11,650 sewerage connections. Treatment is undertaken by 8 water treatment plants and 7 sewage treatment plants. With an asset base of around \$200M¹ and an annual operational budget of about \$22M, the Water and Sewerage Department has responsibility to meet our customers' expectations and licence conditions through applying best practice to the delivery of the service.

2.2 *Purpose of the Review*

The Chief Executive Officer of Gympie Regional Council (GRC) has engaged *AQUA projects* (AQUA) to undertake a comprehensive review of its water and sewerage business, with a view to ensuring it is meeting the needs of all stakeholders into the future. This responsibility of a Water Service Provider (under Queensland Legislation) combined with recent environmental breaches has been the catalyst for undertaking this review and reflects Council's commitment to providing the best possible service. The review will encompass the management of both people and infrastructure.

2.2 *Scope and Outputs of the Review*

The scope of the review was identified in the GRC brief and included:

- Size and makeup of the current Water and Sewerage Branch;
- Current staff capability and capacity.
- Capability of allied internal branches that are part of the business i.e. Construction and Maintenance branch and the Financial Services Branch;
- State Government reporting requirements (operational and financial);
- Current performance indicators and their ability to measure critical indicators and actual performance.
- Current status of operational and capital strategic planning.
- Current maintenance management systems.
- Level of legislative compliance.

The GRC brief also outlined the outputs required, namely:

- The optimum strategy for the water and sewerage business now and into the future, including trade waste charging;
- Recommended structure;
- Recommended skill and staffing levels.
- Areas where performance is deficient and the necessary remedies.
- Key performance indicators that are practical and truly reflective of the overall performance of the business and reflect best practice.

¹ GRC W&S 2015 Performance report

- The cause of recent environmental breaches and remedies if applicable.
- Any matters which expose Council to unacceptable risk.
- Any other matters which impact on the ability to meet industry best practice.

3.0 METHODOLOGY

3.1 *General*

The agreed methodology to facilitate the identification and analysis of organisational topics and issues included:

- Briefing meeting with the CEO, then Director Engineering Services and General Manager Water and Sewerage.
- Identify persons to be interviewed and topics to be pursued.
- Interviews with individual GRC personnel and stakeholders.
- Identification of key topics and follow-up interviews
- Compile a 'draft' Review of Water and Sewerage Report including findings.
- Test the findings with the Client and selected team.
- Develop recommendations and distribute 'draft' Report to Client for comment
- Compile 'final' Report and distribute to Client

Interviews were undertaken by Robin Hagen and Brad Cowan of AQUA with the management and technical staff (including Supervisors) of the following GRC branches

- **Engineering Services**, which carries out system design and infrastructure management, water and sewage treatment, and manages all outsourced work;
- **Corporate and Community Services**, which provides financial services.
- **Infrastructure Services**, which maintains the reticulation system and undertakes some capital work.

In addition, key external stakeholders (Regulatory agencies, Regional partners, etc.) were interviewed as shown below.

A list of issues and questions associated with role, inputs, outputs, performance measures and gaps, improvement measures was canvassed with all interviewees and specific questions (e.g. Penalty Infringement Notices [PIN]) were raised with individuals. The base questions are shown in Appendix A.

Where there were gaps in the information collected a second round of collective interviews was conducted on specific topics, namely; Trade Waste system, Asset Management system, Project Management system, ICT capability, and Quality/Safety/Environment/Health system

3.2 *Existing Documentation*

The documents relating to the nature of the assets and performance of the Water and Sewerage Department were made available by GRC. Documentation raised by interviewees (internal or external) was also supplied. All these documents are listed in Appendix B.

The relevant issues from these documents were reviewed and incorporated where applicable.

3.3 Interviewees

The list of persons interviewed either individually or in small groups are shown in Table 1 below. The Follow-up System interviews are shown in Table 2. All attendees provided a significant amount of individual input.

Robin Hagen and Brad Cowan conducted the interviews (telephone or face to face) over a period from 7 June to 13 July; the timings were a function of interviewee's individual availability. The interview outcomes were consolidated into the findings of this report.

Table 1: Interview Participants and Roles

Participant	Role
Bernard Smith	Chief Executive Officer
CTPI	Manager Corporate Governance
Dimitri Scordalides	Director Infrastructure Services
CTPI	Director Engineering Services Director Corporate and Community Services
Gina Vereker	Director Planning and Development Services
CTPI	General Manager Water and Sewerage
	General Manager Construction and Maintenance
	General Manager Design Services (ES)
	Manager Assets
	Senior Inspector
	Senior Engineer
	Manager Treatment and Compliance
	Supervisor Treatment Plants
	Project Coordinator
	Corporate Risk Manager
	Executive Officer WBBROC
	Outgoing HR Manager
	Trade Pricing
	Management Accounting
Senior Operators (4 off as a Group)	

CTPI	<p>Fitters (2 off as a Group)</p> <p>Project Coordinator (currently Acting Operations Manager), Leading Hand - Water & Sewerage Reticulation Maintenance.</p> <p>Assets Officer – Accounting</p> <p>Design Services Manager</p>
Toni Stiles	Director – Water Supply Regulation, Water Supply Planning and Regulation, DEWS
Rob Fearon	Qld Water Directorate
Paul Butcher	Department of Environment & Heritage Protection

Table 2: Follow up System Interviews

Participants	System
CTPI	Trade waste management
	Quality, Environment, Health and Safety Systems
	Asset Management
	ICT systems

3.4 Staff Participation and Acknowledgement

The interviews and discussions demonstrated very clearly that management and staff wanted to contribute to necessary changes to improved GRC's Water and Sewerage undertaking.

4.0 ANALYSIS & FINDINGS

AQUA has undertaken a number of interviews with individuals and groups of staff involved in the Water and Sewerage undertaking as well as delivery of normal corporate services. In addition, key stakeholders (State government, regulators and industry) were interviewed. The findings from these interviews have been recorded under the relevant Output Questions as follows:

- The optimum strategy for the water and sewerage business now and into the future, including trade waste charging;
- Recommended structure;
- Recommended skill and staffing levels.
- Areas where performance is deficient and the necessary remedies.
- Key performance indicators that are practical and truly reflective of the overall performance of the business and reflect best practice.
- The cause of recent environmental breaches and remedies if applicable.
- Any matters which expose Council to unacceptable risk.
- Any other matters which impact on the ability to meet industry best practice.

4.1 The optimum strategy for the water and sewerage business now and into the future

The interview and survey responses as well as a review of relevant documents indicates the following:

Current key issues to be addressed

- Feedback quotes
 - The active assets appear to be in reasonable condition and generally being operated effectively
 - W&S thinks about assets and expenses only and not customer and income.
 - W&S needs to decide its role in business finance matters
 - W&S do not see their role as price setters and customer managers.
 - No evidence of any robust Capex-Opex 'trade off' regime
 - Trade waste pricing has un-discussed consequences of current CSO pricing. No desire to look at longer term price path issues.
 - No finance statement for W&S available from Finance or requested from W&S.
 - We are not producing quality AM information that would justify the Renewals spend
 - CTPI does not believe that should be doing anything financial - "we are Engineering Services"
 - Great respect for GM W&S technical skills/knowledge and compassion for people - MULTIPLE
 - Little evidence of performance management of staff.
 - Long-term financial planning and asset management plan is not connected.
- Chris Lane DEWS has not expressed any strong direction for Gympie, however his boss Toni Stiles would like to see the business structured for single point accountability and performance.
- Regional aggregation is seen as the future for the water and sewerage undertaking of regional Councils.² For Gympie, that is the other WBBROC councils.
- KPI network performance data and staff comments about high I/I levels, indicate a need to further validate passive asset condition.

Other information to be considered

- The water and sewer business of GRC is a 'public health' business and is heavily regulated by Queensland State Government.
- The water and sewer business of GRC is a providing a 'service for a fee'. It is a monopoly, and financially regulated by Council.
- A comprehensive business model for an integrated water and sewer business focussed on customers and the services they purchase, is common in larger water businesses.
- Queensland Water Directorate (QWD) through QWRAP³ is advocating a Commercialisation business model for Councils such as Gympie.

² Reform of Water and Sewerage Utilities: Review of Sustainable Models - QWRAP Research Report 2 - Section 3.3

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

No.	Strategy	Priority
1.	5.2 GRC form a Commercialised Water and Sewerage business unit (section 28 of the Local Government Regulation 2012).to deliver safe, reliable and environmentally friendly water and sewerage services to its customers.	1
2.	Develop a full set of financial statements for the water and sewerage business. Identify all customer services and their costs. Identify and value Community Service Obligations (CSO) <ul style="list-style-type: none"> • Embedded CSO cost in <ul style="list-style-type: none"> ○ Gympie South – hose connections, ○ Combined Drains management, • Trade Waste agreements, • etc. 	1
3.	5.3 Recruit / resource the business Unit Senior Management team [Appoint a manager of the water and sewerage business, with responsibility for delivery of the above business model. (responsible for both sides of the P&L and Balance Sheet)]	1
4.	5.6 Services provided to the Water and Sewerage business unit by other parts of GRC be formalised and managed through Service Level Agreements.	3
5.	Approach other WBBROC councils about their plans.	2

³ Reform of Water and Sewerage Utilities: Review of Sustainable Models - QWRAP Research Report 2 - Section 3.4

4.2 Trade Waste

The interview and survey responses as well as a review of relevant documents indicates the following.

Current key issues to be addressed

- Feedback quotes
 - Trade Waste is not managed from Development Application through to Trade Waste Agreement.
 - W&S needs robust trade waste pricing
 - Trade Waste price path is unclear.
 - Nestle agreement is out of date – CSO governance is unclear, Trade Waste needs cleaning up as the processes are unclear

Other information to be considered

- A comprehensive review of CSO development and Trade waste pricing has been completed by AEC⁴. It shows that 'User Pays' has not been fully implemented in the W&S undertaking.
- Trade Waste regulation is applied by Council.
- Trade waste customers receive a service for a fee.
- 'User pays' principles are accepted by most communities and have been generally implemented in local government for many years.
- CSO's should be determined by Council after they have been made aware on the value (real cost) of the CSO.

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

.	Strategy	Priority
6.	Develop an integrated process for GRC Trade Waste from Development Application or complaint / Infringement to disposal (sewerable or otherwise). Approach Unitywater to understand their Trade Waste process and how they link to Councils' Development Assessment processes.	2
7.	Allocate SMT responsibility for the GRC Trade Waste process.	2
8.	5.6 Services provided to the Water and Sewerage business unit by other parts of GRC be formalised and managed through Service Level Agreements. (Formalise and manage the GRC Trade Waste process through Service Level Agreements.)	2
9.	5.1 GRC complete the implement of the 'user pays' principle across Council.	1
10.	Review the structure and detail of all Trade Waste agreements	2
11.	Develop a cost reflective pricing structure for Trade Waste after detailed consultation with Unitywater (avoid 'Council shopping' by Trade Waste customers).	2
12.	Undertake a Trade Waste customer consultation process on the proposed new pricing structure.	2

⁴ AEC Water and Sewerage Pricing Review 201516

4.3 Recommended organisation structure

The interview and survey responses as well as a review of relevant documents indicates the following.

Current key issues to be addressed

- Feedback quotes
 - Infrastructure Services - Field Group – not meeting W&S needs - MULTIPLE COMMENTS
 - Have not seen any benefits or productivity gains with ES/IS 'split'; rather the converse - MULTIPLE
 - Would like to see a structure for W&S as a business - 'big picture' person to lead
 - ICT - not meeting W&S needs
 - Integrate all parts of W&S, it worked better when we were all together.
 - Set out roles and responsibility for all staff (in PDs) - MULTIPLE
 - Communication between GRC silos is poor - MULTIPLE
 - Communication between W&S and Infrastructure Services - Field Group is non-existent.
- A governance framework is required for clarity of decision making.

Other information to be considered

- This is a 'fee for service' business earning around \$22M annually.
- If a new business model is adopted a new organisation structure will follow.
- Infrastructure Services - Field Group, which maintains the reticulation system and undertakes some capital work, does not have an SLA with W&S.
- Annual Planned Sewer maintenance program around 15 % not completed last year
- Annual Planned Water Flushing maintenance program not undertaken last year
- The excessive sewer choke rates⁵ should have had a sewer maintenance OPEX solution not a CAPEX sewer re-lining solution.
- No capital works undertaken last year by Infrastructure Services - Field Group
- No management accounting capability in W&S.
- DEHP staff issuing the PIN for the Pump Station did not see single point accountability for the system/network failure (3 in a few weeks).
- Difficult for staff to manage system / network outcomes (split between active and passive assets) when responsibility is shared by Directorates

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

No.	Strategy	Priority
13.	5.2 GRC form a Commercialised Water and Sewerage business unit to deliver safe, reliable and environmentally friendly water and sewerage services to its customers. (Appoint the W&S Business Manager reporting directly to the CEO leading a re-integrated water business reporting directly to the	1

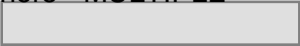
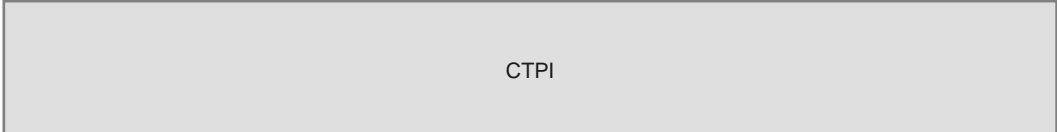


⁵ GRC Annual report 2014-2015

	CEO. Collapsing the remaining Engineering Service and Infrastructure Services into one Directorate.)	
14.	5.3 Recruit / resource the business Unit Senior Management team Streams reporting to the W&S business manager; <ul style="list-style-type: none"> • Operations and Maintenance (Networks and Treatment) • Planning and Investigations • Project Delivery • Customer & Commercial Services) 	1
15.	Undertake Strategic (Customer Service Standards, Demand Management strategy, Price Paths and Pricing Strategy, etc.) and Business Planning (externally facilitated)	2
16.	Develop PDs and KPIs for all staff	3

4.4 Recommended skill and staffing levels

The interview and survey responses as well as a review of relevant documents indicates the following.

Current key issues to be addressed

- Feedback quotes
 - The 'succession strategy' is loose / non-existent but not implemented because of engagement / employment constraints. - MULTIPLE
 - Download Senior staff technical knowledge to others - MULTIPLE
 - There will be a large W&S knowledge gap when 
 - Aging workforce and equipment. - MULTIPLE
 - Too many secondments - MULTIPLE
 - Little performance management - MULTIPLE
 - 
 -  CTPI 
 - Solid network based on personal relationships below management level keeps W&S functioning - this is slowly being broken down with current arrangements
 - Recognition of our good staff at the 'grassroots' - 'out of sight, out of mind'
 - Role of Supervisor Treatment Plants is unclear w.r.t. compliance is unclear.
 - Specialist W&S mechanical/electrical engineer suggested to be engaged given the asset management and specialist equipment in W&S
 - Understaffed – 15 systems to develop and manage and 18 people to operate (not enough supervisors and vehicles.)
 - 2 or 3 senior staff with over a year Annual Leave.
 - Light vehicles still serviced in house.
 - Need enough staff to allow interchanges for extended Leave or transition to retirement - MULTIPLE
 - Infrastructure Services - Field Group have not delivered planned work e.g. CCTV work, mains flushing, sewer investigations, etc. Minimal outsourcing of work
 - Need more support in finance, asset management & ICT. - MULTIPLE
 - More administration /secretarial support required
 - No recognition that supervisory resources for a project are funded by the project.
 - Business Improvement Projects are not normally scoped, nor resources specifically allocated.

Other information to be considered

- This is a 'fee for service' business earning around \$22M annually.
- Capital works around \$10M (new and renewals) annually.
- If a new business model is adopted a new organisation structure will follow.
- Infrastructure Services - Field Group, which maintains the reticulation system and undertakes some capital work, does not have an SLA with W&S.
- Annual Planned Sewer maintenance program around 15 % not completed last year
- Annual Planned Water Flushing maintenance program not undertaken last year
- The excessive sewer choke rates should have had a sewer maintenance OPEX solution not a CAPEX sewer re-lining solution.
- No capital works undertaken last year by Infrastructure Services - Field Group
- No management accounting capability in W&S.

- Difficult for staff to manage system / network outcomes (split between active and passive assets) when responsibility is shared by Directorates
- Staff see little evidence of planned resource allocation.
- There is no working system for relieving staff who are on leave. E.g. No automatic ‘acting up’ and finding temporary replacements from below.

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

No.	Strategy	Priority
17.	5.3 Recruit / resource the business Unit Senior Management team (Appoint the W&S Business Manager (SMT member) with leadership and Water Engineering management skills, leading a re-integrated water business reporting directly to the CEO. Collapsing the remaining Engineering Service and Infrastructure Services into one Directorate)	1
18.	5.3 Recruit / resource the business Unit Senior Management team [Appoint Middle level Managers with Leadership and Technical Management skills, for; <ul style="list-style-type: none"> • Operations and Maintenance (Networks and Treatment, Safety, Tactical & Operational Asset Management [Compliance Management (may be included with Asset Management)]) • Planning and Investigations (Business and Assets + Strategic Asset Management) • Projects (Business and Assets, Project Development and Project Delivery) • Customer & Commercial Services (Finance SLA, Customers, Quality, Environment, Safety, Health Management System, ICT SLA, Fleet SLA, Trade Waste SLA)] 	1
19.	Immediately employ sufficient skilled staff to allow backfilling of positions for leave to be taken [redacted]. Appoint these staff for the reasons listed and transition to the new business model, expected to be 6-12 months	1
20.	Appoint current [redacted] in a temporary role as Chief Assets Engineer [redacted]. He should be required to ensure all his asset knowledge is distilled into the Asset Management System or other systems where W&S Business Manager requires.	1
21.	Review the W&S light vehicle fleet allocation and management especially for Senior Operators.	1
22.	After the Business Model is implemented a detailed staffing and skilling assessment should be undertaken. e.g. O&M may be outsourced or insourced via an SLA.	2
23.	5.8 Develop and Implement a Change Management Plan (including Relationship Management) as part of the Implementation Plan for the GRC approved strategies in this report. (Kotter suggested)	2&3

4.5 Areas where performance is deficient and the necessary remedies

The interview and survey responses as well as a review of relevant documents indicates the following.

Current key issues to be addressed

- Feedback quotes
 - The treatment plants appear to be operating well within their capacity.
 - The GRC WH&S system does not assist in the identification of W&S site safety issues. e.g. Storage and handling of gaseous Chlorine.
 - Excessive accrued Annual Leave and Long Service Leave
 - Need enough skilled staff to allow interchanges for extended Leave [REDACTED]
 - [REDACTED] - MULTIPLE
 - Need to resource a project to make Assetic a real asset and management system including asset identification and condition assessments
 - Implementation of 'Assetic' Asset Management system for W&S has not progressed to the extent needed to manage the relevant facilities/assets
 - Asset Management in W&S is disorganised.
 - Asset Management system is still essentially manual.
 - No connection between Long Term Financial Plan and asset management
 - Infrastructure Services - Field Group have not delivered annual planned work e.g. CCTV work, mains flushing, sewer investigations, etc.
 - Little performance management, difficult people are not readily dealt with - MULTIPLE
 - Project Management Framework introduced - larger projects only (Director ES is the 'owner'). Issues raised about comprehensiveness and effectiveness of introduced system
 - All construction and maintenance works largely internally delivered and not prioritised or reliably delivered (except for larger projects delivered by contract). Minimal use of subcontractors
 - No overall project prioritisation process for both IS and ES projects - can't develop detailed planning, scheduling and delivery strategies for all project types (some views that ES projects
 - Very little standard documentation available for all phases of project delivery and contract administration
- Base GIS sewer data is design not 'as constructed'. GRC cannot advise Property Owners of manhole on property.

Other information to be considered

- Infrastructure Services - Field Group, which maintains the reticulation system and undertakes some capital work, does not have an SLA with W&S.
- Little evidence of 'Safety in Design' (a legislated requirement) being implemented
- Annual Planned Sewer maintenance program around 15 % not completed last year
- Annual Planned Water Flushing maintenance program not undertaken last year
- No evidence of decisions being worked through an OPEX / CAPEX trade-off.
- No capital works undertaken last year by Infrastructure Services - Field Group
- No management accounting capability in W&S.
- Difficult for staff to manage system / network outcomes (split between active and passive assets) when responsibility is shared by Directorates

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

No.	Strategy	Priority
24.	5.2 Develop and agree a Commercialised business model to manage the water and sewerage undertaking. The business model should ensure a long term safe, sustainable business satisfying the needs of customers, regulators and owners financial expectations.	1
25.	5.7 Develop and implement a governance framework for transparency and responsibility for asset creation, operation and maintenance.	1
26.	5.6 For all services provided to W&S business unit by other Council business units, develop and agree (GRC internal) Service Level Agreements.	2
27.	5.5 Implement a comprehensive and formal Project Management Framework for Project Development and Delivery (level of processes/documentation tailored to suit the various 'risk' levels/types of projects delivered [included lessons from other Councils who have implemented these AQUA facilitated systems])	2
28.	5.4 Implement suitable customer, financial, asset management, quality, safety and environmental systems to ensure the business unit's long term viability and regulatory compliance.	2
29.	Develop a full set of KPIs (customer, commercial, regulatory, safety, environmental) for the water and sewerage business.	2
30.	KPIs to be included in PDs and contracts for all senior management.	2
31.	Appoint a project manager to work with the Corporate Asset Management Team to implement the W&S related information into the Assetic AM System (including lessons from other Assetic System users in LG water businesses)	2&3

4.6 Key performance indicators that are practical and truly reflective of the overall performance of the business and reflect best practice

The interview and survey responses as well as a review of relevant documents indicates the following.

Current key issues to be addressed

- W&S staff safety is not separately reported. Work type safety performance is not available, hence effectiveness of management action cannot be measured
- Reported yin the State Benchmarking report ⁶ is around the State Median, with the following areas needing further investigation;
 - *Operating Costs per property - Sewerage* are about 1/2 the State Median, but
 - *ERRR - Sewerage* is only ~3.2% with State Median at ~ 4.7%
 - **Data error or Inconsistent pricing strategy?**
 - *Operating Costs per property - Water* are about 1/3 the State Median, but
 - *ERRR - Water* is ~6.2% with State Median at ~ 4.7%
 - **Data error or inconsistent pricing strategy?**
 - *No. of water main breaks per 100 km* about 1/3 the State Median
 - *Real Water Losses* - Almost double the State Median
 - **User pays not fully implemented or meter program incomplete?**
 - *Number of water and sewerage complaints per 1000 properties* - exceedingly low.
 - *Number of sewer main breaks and chokes per 100 KM of Sewer main* - almost 4 times the State Median
 - **Data error or very tolerant customers?**
 - *Average response times for incidents - sewerage* is 38 minutes which given Unitywater and QUU are in the low 200 minutes. **Seems to indicate over-servicing**, notwithstanding the QWD comments on unreliability.

Other information to be considered

- A Water Service Provider has Safety KPIs that can be benchmarked.
- A customer focussed commercial water business would have a range of commercial KPIs commonly used by the industry.
- As a Water Service Provider GRC's water business has twenty (20) production and environmental reports to produce each year, around 4 quarterly and a few that are incident driven. See Appendix C.
- Many of the KPIs currently in use are asset related. Specific GRC customer service KPIs should be developed.
- W&S staff knew of the potential for data error but still allowed the 'performance information' to be published/issued.
- No evidence of Standard Operating Procedures showing the decision continuum of **Reactive Maintenance** tasks through to **Planned Maintenance** tasks, and then into **Renewals**.

⁶ Queensland State Benchmarking Report 2014-15

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

No.	Strategy	Priority
32.	5.2 GRC form a Commercialised Water and Sewerage business unit to deliver safe, reliable and environmentally friendly water and sewerage services to its customers	1
33.	5.7 Implement a governance framework to ensure transparency and accountability for all decisions that influence business performance and regulatory compliance	1
34.	5.6 Services provided to the Water and Sewerage business unit by other parts of GRC be formalised and managed through Service Level Agreements.	1
35.	5.4 Implement suitable customer, financial, asset management, quality, safety and environmental systems to ensure the business unit's long term viability and regulatory compliance. (Standards Operating Procedures for all operating activities, showing decisions and measurements)	1
36.	Develop a full set of KPIs (customer, commercial, regulatory, safety, environmental) for the water and sewerage business.	2
37.	KPIs to be included in PDs and contracts and bonus arrangements for all senior management.	2

4.7 *The cause of recent environmental breaches and remedies if applicable*

The interview and survey responses as well as a review of relevant documents indicates the following chronology supplied by GRC.

Goomeri & Kilkivan STP's

Approx. Date	Event	Location
May-13	Ranson Rd Overflow	Gympie
Q3-2013	Original Inspection of plants by DEHP	Goomeri & Kilkivan
Oct-13	Council Provided Improvement Undertaking	Goomeri & Kilkivan
Nov-13	DEHP accepted Councils action Plan	Goomeri & Kilkivan
Apr-15	DEHP Follow up Audit of sites	Goomeri & Kilkivan
May-15	New Licence discussed	All Plants
May-15	Plant Inspection by DEHP	Goomeri & Kilkivan
May-15	Warning Notice Issued	Goomeri & Kilkivan
Jun-15	Rock Filter Built	Goomeri
Jul-15	Landholder complaint about release to creek	Goomeri
Aug-15	Refurbished Imhoff Tank	Kilkivan
Aug-15	Smalley Place Overflow-Retic manhole	Gympie
Aug-15	Tucker St Overflow -Retic Manhole	Gympie
Sep-15	Notice to commission Environmental Investigation from DEHP	Kilkivan & Goomeri
Sep-15	Wide Bay Water Commissioned to do environmental report	Kilkivan & Goomeri
Sep-15	PIN Notice Issued	Kilkivan & Goomeri
Sep-15	Browns Road Overflow Breach noted by DEHP	Gympie
Dec-15	Browns Rd Breach Notice from DEHP	Gympie
Mar-16	DEHP accepted Consultants Report	Goomeri & Kilkivan
May-16	DEHP Sampled creek water for unsafe microorganism levels	Goomeri

G7 Pump Station - Browns Road.

Approx. Date	Event	Location
Aug-15	Smalley Place Overflow-Retic manhole	Gympie
Aug-15	Tucker St Overflow -Retic Manhole	Gympie
2/09/2015	Overflow found by Manager Retic Operations	Gympie
2/09/2015	Reported to EHP by Shaun Johnston-Fat on level probe noted as initial cause	Gympie
2/09/2015	Council fixed problem with pump station and commenced cleanup- Found to be airlock in pump	Gympie
3/09/2015	EHP Officers inspected site	Gympie
3/09/2015	No Environmental Harm caused	Gympie
3/09/2015	EHP instructed creek bed be scraped and sucked out(Fish living in there vacuumed up)	Gympie
4/09/2015	Cleanup completed	Gympie
Sep-15	New SCADA system proven to have been implicated in inability to detect overflow	Gympie
Sep-15	Monitoring continued until mid-October 6	Gympie
Sep-15	Browns Road Overflow Breach noted by DEHP	Gympie

Current key issues to be addressed

- Feedback quotes
 - Goomeri and Kilkivan oversized – need re-engineering
 - Data was not reliably collected.
 - Management Plans existed but actions not routinely undertaken by Operators.
 - Not meeting all licence requirements.
 - Told management we were under-resourced and unsupported by GRC systems.
 - PS overflow upgrading SCADA and initially reported reason fat on probes – actually partial pump blockage.
 - SWIMS was not on treatment supervisor's computer.
 - My role w.r.t. compliance is unclear.
 - New SCADA system did not recognise the correct PS. Finally when found correct PS, the fault was listed incorrectly.
 - Relationship between GM W&S and DEHP (Paul Butcher)
- It appears that DEHP has been issuing more PINs for water service providers, of recent times.

Other information to be considered

- As a Water Service Provider GRC's water business has twenty (20) production and environmental reports to produce each year, around 4 quarterly and a few that are incident driven. See Appendix B
- DEHP reasons for taking action on Goomeri & Kilkivan STP's
 - Accepting the legacy of the plants, we inspected STP's around May 2013 and advised GRC;

- GRC not monitoring performance as required.
 - Discharges not meeting a range of important criteria
 - Integrated the permits around Sept 2014 + Show Cause response - very limited.
 - Reinspection late 2015 showed;
 - GRC some monitoring improvement
 - No real change in 2 years.
 - **PIN issued**
 - In 2016 some serious action has been advised but implementation effects are have not been made available to DEHP.
- DEHP reasons for taking action on G7 Pump Station - Browns Road.
 - Dry Weather overflow events;
 - 'Tractor Slasher' damage - 18 August 2015
 - Defective maintenance works - Late August 2015
 - PStn overflow - Creek was BLACK - Sept 2015
 - GRC responses;
 - PStn overflow was because of;
 - We responded to the alarm but the system was wrongly coded, so we went to another pump station which was OK, then
 - When we found the correct overflow it was a problem with fat on the electrodes, then
 - It was 'cavitation' in a pump impeller caused by ?
 - DEHP asked when the network was inspected and were told three different answers from three different people. One of them "we CCTV every 10 years".
 - **PIN issued**
- DEHP has implemented an internal moderation process to ensure all PINs are issued on a consistent state-wide basis.

Proposed Strategies and Priority:

- The PINs are signs of endemic systems failures;
 - System performance poorly recorded.
 - The PSTN and pipeline staff were not communicating and Regulator was given obviously conflicting information. One central contact for DEHP relations. e.g. 'Compliance Manager'.
 - The treatment Plant failures had been obvious to Regulator or two years and no change.
 - Poor Commissioning of SCADA system. No formal Project Management system for project Development and Delivery

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

No.	Strategy	Priority
38.	5.5 Implement a formal Project Management system for project Development and Delivery	1
39.	5.3 Recruit / resource the Business Unit Senior Management team (Assign management responsibility for the individual network (pipelines, pump stations, tanks, dosing, and treatment) with responsibility for customer and regulator outcomes for each	1

	network.)	
40.	5.7 Implement a governance framework to ensure transparency and accountability for all decisions that influence business performance and regulatory compliance (Develop and implement a governance framework for transparency and responsibility for asset delivery, operation and maintenance.)	1
41.	5.4 Implement suitable customer, financial, asset management, quality, safety and environmental systems to ensure the business unit's long term viability and regulatory compliance. <ul style="list-style-type: none"> • (Standards Operating Procedures for all operating activities, showing decisions and measurements) • [Develop and implement an integrated Quality, Environment and Safety system for the W&S business unit. (Compliance Management Plan)] 	1
42.	Ensure network and facility workflows include measurement and testing activities. Include in PDs and other responsibility documentation.	2
43.	Compliance KPIs to be included in PDs and contracts for all senior management.	2
44.	Develop a communication and relationship management plan covering all compliance stakeholders for all as part of the Compliance Management Plan	2&3

4.8 Any matters which expose Council to unacceptable risk

The interview and survey responses as well as a review of relevant documents indicates the following.

Current key issues to be addressed

Commercial Risks

- No evidence of any robust Capex-Opex 'trade off' regime
- Not producing adequate or quality financial information to enable GRC to assess the efficacy of the WS&S function, and appropriately consider future strategies to ensure best value for customers in the delivery of WS&S services.
- We are not producing quality AM information that would justify the Renewals spend
- The Annual report⁷ notes
 - *Number of sewer main breaks and chokes per 100km mains/year - TARGET <25 ACTUAL 40*
 - *Total sewage overflow incidents per year- TARGET <10 ACTUAL 51*
 - **REASON GIVEN:** Council has commenced a program of relining of sewers which have had main breaks and chokes. This should reduce chokes and incidents over the next few years.
 - **MOST LIKELY:** Reactive maintenance below standard performance + results from detailed investigation of failure modes for the pump stations

Quality, Safety, Environment Risks

- Quality Plans are proposed for future projects, cost not currently factored in.
- Site based Environment Management Plans for STPs exist but project and network operations environment practises are ad-hoc. e.g. silt into waterways is not regulated by GRC. No evidence of standard practices of responding to environmentally damaging incidents.
- The GRC safety management system has JSA and usual process, but management information is high level only.
- JSA's and WMS's that effect working in manholes and confined spaces are inadequate.

Other information to be considered

- As a Water Service Provider GRC's water business has twenty (20) production and environmental reports to produce each year, around 4 quarterly and a few that are incident driven. See Appendix C.
- W&S feels it has lost control of network operations and are not implementing O&M solutions for network problems and resorting to capital solutions.
- GRC accident statistics are not available at 'job type' level, such as outside construction workers or treatment plant operators. Difficult to target management actions.
- Most private Tier 1 and 2 contractors have a LTIFR of less than 2. This includes high risk heavy engineering work both above and underground.

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

⁷ GRC Annual Report 2014-2015

No.	Strategy	Priority
45.	5.2 GRC form a Commercialised Water and Sewerage business unit to deliver safe, reliable and environmentally friendly water and sewerage services to its customers (The business model should ensure a long term safe, sustainable business satisfying the needs of customers, regulators and owners financial expectations.)	1
46.	5.7 Implement a governance framework to ensure transparency and accountability for all decisions that influence business performance and regulatory compliance (Develop and implement a governance framework for transparency and responsibility for asset creation, operation and maintenance.)	1
47.	5.6 Services provided to the Water and Sewerage business unit by other parts of GRC be formalised and managed through Service Level Agreements.	2
48.	5.4 Implement suitable customer, financial, asset management, quality, safety and environmental systems to ensure the business unit's long term viability and regulatory compliance (Develop and implement an integrated Quality, Environment and Safety system for the W&S business unit.)	1
49.	Develop a full set of KPIs (customer, commercial, regulatory, safety, environmental) for the water and sewerage business.	2
50.	Set targets for achievement of a safe, sustainable business long term.	2&3

4.9 Any other matters which impact on the ability to meet industry best practice

The interview and survey responses as well as a review of relevant documents indicates the following.

Current key issues to be addressed

- Feedback summary
 - The active assets are in reasonable condition, but the business systems are manual at best with no evident integration. Support from corporate services provider is almost non-existent because of the entrenched departmental silos. Staffing levels are inadequate and management is fractious and devoid of leadership.
 - The cost to build up to a sustainable business again are considerable and will take at least two years, at a guess.

Other information to be considered

- A water business must be customer focussed rather than asset focussed to meet industry best practice.
- Research by the Queensland Water Directorate - *Reform of Water and Sewerage Utilities: Review of Sustainable Models*⁸
 - Regional aggregation of local services
 - Commercialisation

Proposed Strategies and Priority:

Where a proposed strategy is considered part of a Key Recommendation it is number 5.1 to 5.8 below.

Priority 1 – immediate, Priority 2 – after Business Unit is formed, Priority 2 - When Option B, C or D implemented,

No.	Strategy	Priority
51.	Undertake the recommended actions with a partner (WBBROC Council/s or Unitywater). This should give a deeper skill pool to work with, share any working processes give a bit more negotiating power with Corporate service providers.	3

⁸ Reform of Water and Sewerage Utilities: Review of Sustainable Models - QWRAP Research Report 2 - Section 3.3 & 3.4

5.0 KEY RECOMMENDATIONS

The following key recommendations are submitted for consideration by Gympie Regional Council:

Option A (Commercialised Business Unit of Council)

GRC forms an integrated water business reporting directly to the CEO and collapses the remaining Engineering Service and Infrastructure Services into one Directorate.

- 5.1 GRC complete the implement of the 'user pays' principle across Council.
- 5.2 GRC forms a Commercialised Water and Sewerage business unit (as per section 28 of the Local Government Regulation 2012) responsible to deliver safe, reliable and environmentally friendly water and sewerage services to its customers.
- 5.3 Recruit / resource the business Unit Senior Management team
- 5.4 Implement suitable customer, financial, asset management, quality, safety, environmental and compliance management systems to ensure the business unit's long term viability and regulatory compliance.
- 5.5 Implement a formal Project Management framework across Council
- 5.6 Services provided to the Water and Sewerage business unit by other parts of GRC be formalised and managed through Service Level Agreements.
- 5.7 Implement a governance framework to ensure transparency and accountability for all decisions that influence business performance and regulatory compliance.
- 5.8 Develop and Implement a Change Management Plan (including Relationship Management) as part of the Implementation Plan for the GRC approved strategies in this report. (Kotter suggested)

Option B (Commercialised business unit with other WBBROC councils)

In the light of the benefits of aggregation highlighted in the QWD report⁹ and the shortage of available competent management to undertake Option A, GRC should consider approaching other WBBROC councils for a council owned entity to take on provision of water and sewerage services for its combined area. The tasks listed in Option A could then be resourced and undertaken collaboratively. GRC should be a reasonably attractive partner because its W&S active assets are in a reasonable condition.

Option C (Commercialised business unit with Unitywater)

In the light of the benefits of aggregation highlighted in the QWD report¹⁰ and the shortage of available competent management to undertake Option A, GRC should consider approaching Unitywater to take on provision of water and sewerage services for its area. (Noosa Shire Council continues to have these services delivered by Unitywater.)

⁹ Reform of Water and Sewerage Utilities: Review of Sustainable Models - QWRAP Research Report 2 - Section 3.3

¹⁰ Reform of Water and Sewerage Utilities: Review of Sustainable Models - QWRAP Research Report 2 - Section 3.3

Unitywater could be interested in an equity partner, e.g. Equity equivalent to the comparative value of GRC W&S assets. GRC should be a reasonably attractive partner because its W&S active assets are in reasonable condition.

Option D (Commercialised business unit with industry partner)

In the light of the current shortage of competent management to undertake Option A, GRC should consider engaging a private contractor for provision of water and sewerage services for its area. This could be in the form of an insource/outsource arrangement. The contractor takes on all the management and staff initially, with the goal of setting up all the systems and building an effective and efficient business. Passing it all back at the end of the term with a fully trained management and staff with the necessary core skills. The assets continue to be owned by GRC. GRC should be a reasonably attractive partner because its W&S active assets are in reasonable condition. The size of the business is just large enough to be attractive to contractors wanting a presence in the South East Queensland market.

6.0 IMPLEMENTATION

After this Report is reviewed by Gympie Regional Council and strategies and actions are agreed, an Implementation Plan needs to be developed.

1. The Implementation Plan should be directed at achieving a shared Vision for the business, namely;

"Establish Gympie Water as a Commercialised Water and Sewerage business unit responsible to deliver safe, reliable and environmentally friendly water and sewerage services to its customers."

Gympie Water must look to the future so it is best placed to invest in the industry, its people and systems to optimise their responsibility to provide services to customers. This unique opportunity requires skilled senior management with commercial and technical knowledge, supported by suitably skilled staff. Their systems for operation, maintenance and capital investment must be integrated and ensure quality, environmental, public health, compliance and a safe workplace. This can be achieved by structuring the business with a customer and commercial focus whilst addressing its key vulnerabilities.

2. The Report has highlighted some key vulnerabilities for the Senior Management in the Water and Sewerage decision making chain, such as;

Issue	Risk Category	Risk Assessment	Risk Rating
Little evidence of strategic planning	<i>Reputation</i>	<i>Moderate/ Possible</i>	High
Poor long term performance of Environmental License KPIs	<i>Environment</i>	<i>Moderate/ Likely</i>	High
Absence of <u>any</u> useable Safety Performance information – ‘ignorance’ is no defence.	<i>Reputation</i>	<i>Major/ Almost certain</i>	Extreme
No evidence of robust Capex/Opex ‘trade off’ decision making especially for Renewals projects [annual Capital spend \$11M]	<i>Assets</i>	<i>Major/ Likely</i>	High
No evidence of robust options development and assessment (project management) [annual Capital spend \$11M]	<i>Assets</i>	<i>Major/ Likely</i>	High
Ad-hoc asset management especially for the passive assets (\$190M)	<i>Assets</i>	<i>Major/ Likely</i>	High
Staff confused about roles and accountability	<i>Personnel</i>	<i>Moderate/ Likely</i>	High

These key business risks have an GRC Enterprise Risk Ranking¹¹ which is shown in **bold**; they should to be targeted in the Implementation Plan.

¹¹ Enterprise risk management

3. Implement a comprehensive change program (W&S Business Improvement Program [W&SBIP]) that includes all strategies and initiatives, addressing internal as well as external issues in the Water and Sewerage Department. This will demand strong leadership, not from just one person but at all levels of the organisation. In a number of areas W&S has some significant 'catching up' to achieve industry best practice. The project should use a proven change management model; such as Kotter's 8 steps. The task ahead is to implement change and minimise disruption while maintaining service levels. All identified issues will need to be analysed and prioritised, with associated action plans to be developed and owned by W&S stakeholders to ensure the changes are sustained.

The W&S Business Improvement Program should:

- Undertake a discussion on the proposed W&S Business Improvement Project (content and change management process) with relevant Council senior managers and ES management
- Appoint a project manager to manage the W&S Business Improvement Project (may include an external mentor for an identified GRC project manager as a development opportunity)
- Form a project team with 'change agent' representatives from the respective branches/work units (and relevant Corporate Services departments)
- Develop a detailed project and change management plan including identifying and allocating resources required
- Implement the approved organisational structure and staffing changes
- Undertake independent audits at 3 month intervals of progress against the project implementation plans and report to senior management

There are a number of priority strategies that can be addressed easily and quickly. To demonstrate that the Council is supportive of the change agenda, it is recommended that these be addressed as soon as possible.

Report Submitted by:



**Managing Principal
AQUA projects**

7.0 APPENDICES

Appendix A: Interview Questions

Q1 What is the role of your branch / section / group / workunit in GRC
Q2 Who are the customers/clients of your branch / section / group / workunit?
Q3 Are you meeting your customer's needs? How do you know?
Q4 Who supplies your section or group with services or other inputs?
Q5 Are they meeting your needs? How do you know? How do they know?
Q6 What does your group perform well and why?
Q7 What needs improvement and why?
Q8 Do you have any knowledge of the activities that resulted in the Penalty Infringement Notice and Warnings applied under the EPA Act issued in late 2015
Q9 For this review to be a success, what should it produce?
Q9 Are there any major issues that W&S needs to face in the short and medium term? Why?
Q10 Any other comments on W&S?

Appendix B: Document List

No	Title	File name
1.	GRC Annual report 2014-2015	GRC Annual Report 2014-2015
2.	GRC Corporate Plan 2014-19	GRC Corporate Plan 2014-19
3.	Operational Plan 2015-16	GRC Operational Plan 2015-16
4.	GRC Organisation Chart	GRC Org chart
5.	Water and Sewerage Annual Performance report	GRC W&S 2015 Performance report
6.	Water and Sewerage Business Unit - Business Plan	Water Sewerage Branch Business Plan REV 2 - April 2016
7.	Staff surveys	Gympie 2015 - Comparative Results - Engineering Services Gympie 2015 - Engineering Services - Water and Sewerage - Engineering
8.	AEC Water and Sewerage Pricing Review 201516 (Price Path and Trade Waste)	Water and Sewerage Pricing Review 201516 - Draft V2 (003)
9.	Queensland State Benchmarking Report 2014-15	State_Benchmarking_2014-15
10.	Gympie Southside Sewerage Program	ENG_Southside-Sewerage-10-year-program
11.	Environmental Breach - G7 Pump Station Browns Rd	04122015130618
12.	Environmental Breach - Goomeri STP	15092015120441
13.	Environmental Breach - Kilkivan STP	15092015120441
14.	WBBROC documents relating to the regional provision of water and sewerage	
15.	Reform of Water and Sewerage Utilities: Review of Sustainable Models QWRAP Research Report 2	Review+of+Sustainable+Water+and+Sewerage+Service+Models
16.	Enterprise risk management	OCP201 - Enterprise risk management

Appendix C: Reporting Obligations

SUMMARY OF WATER AND SEWERAGE BRANCH REPORTING REQUIREMENTS						
Report	To	Area	Regularity	Timing	Nature of Reporting	Regulation/Act
Monthly Environmental License Exceedances	DEHP	All STPs and pump stations	Monthly	Within 14 days EOM	Complete review of all operational data for all sewage treatment plants to determine and report EVERY breach of licence conditions for month. All flows, mass loadings and license condition tests for month plus all overflows within plants or in the networks.	Environmental Protection Act 1994 - Section 5
Quarterly water use reporting	SEQWater	Borumba Dam	Quarterly	Within 5 days EOM	Water drawn from Borumba Dam via Yabba Creek and Mary River under licenses Collation of daily raw flows for periods at each site.	Commercial Agreement
Quarterly fluoride report	Queensland Health & DEWS	Gympie and Tin Can Bay/Cooloola Cove	Quarterly	Within 7 days EOM	Compilation and summary of all daily fluoride readings and statistical analysis for period	Water Fluoridation Act 2008
Quarterly effluent quality reporting	DSITIA	All STPs	Quarterly	Within 1 month of EOM	Manual entry of each test for all conditions of environmental licences for releases to the environment including daily flows for each STP	Environmental Protection Act 1994
Annual report on environmental performance	EHP	All environmental activities	Annual	By 31 July	Complete set of all data for environmental licence tests, REMP tests, flows, mass loads and overflows tabled and graphed. Includes analysis and commentary on all deviations and trends, including proposed rectification plans	Environmental Protection Act 1994
Emergency overflow reporting	EHP	All environmental activities		Immediate	Report of any overflows or releases likely to cause environmental harm from treatment plants or reticulation systems	Environmental Protection Act 1994

SUMMARY OF WATER AND SEWERAGE BRANCH REPORTING REQUIREMENTS						
Report	To	Area	Regularity	Timing	Nature of Reporting	Regulation/Act
Annual report on drinking water quality management plan	DEWS & Queensland Health	Water Treatment and Reticulation	Annual	1 October	Summarised and statisticised report on ALL tests and monitoring of water treatment plants and reticulation systems throughout the year. With commentary on trends, risk analysis, progress reporting, exception reporting and on-going improvement programs.	The Water Supply (Safety and Reliability) Act 2008; Public Health Act 2005
Drinking water incident reporting	Queensland Health	Water Treatment and Reticulation		Immediate	Report on any non-conformances to drinking water quality management plan ADWG health indicators	The Water Supply (Safety and Reliability) Act 2008; Public Health Act 2005
Annual report on customer service standards	Internal, DEWS and Queensland Health	Water and Sewerage Services	Annual	By 31 July alone or 1 October with Council's Annual Report	Annual report on all W&S customer interactions in relation to their set customer service standard. Includes commentary, rectification and improvement actions.	The Water Supply (Safety and Reliability) Act 2008
Annual water account	Australian Bureau of Statistics	Water and Sewerage Services	Annual	1 October	Annual Report to lower level than NPR, addressing water usage by individual industries within region.	Australian Bureau of Statistics Act 1975
Australian national performance report	Bureau of Meteorology	Water and Sewerage Services	Annual	1 October	Annual Report on ALL aspects of the WSP to a set of parameters defined by federal regulatory bodies. Forms part of report to state regulators. Audited.	The Water Supply (Safety and Reliability) Act 2008
Annual performance report as a Queensland water service provider	DEWS	Water and Sewerage Services	Annual	1 October	Report on criteria defined by the state regulators (DEWS, DEHP, Queensland Health) which includes NPR report criteria or variations on same. Has to be able to stand audit from Queensland Audit Office	The Water Supply (Safety and Reliability) Act 2008

SUMMARY OF WATER AND SEWERAGE BRANCH REPORTING REQUIREMENTS						
Report	To	Area	Regularity	Timing	Nature of Reporting	Regulation/Act
Cooloola sand mass bore monitoring	DNRM	Rainbow WTP source waters	Annual	1 month	Report on continuous monitoring data collected in production and test bores in Cooloola Sand mass aquifer. Includes graphs, trends and analysis.	The Water Reform and Other Legislation Amendment Act 2014; The Water Act 2000
Goomeri Water Use	DNRM	Kinbombi weir and off-stream storages	Monthly	1 month	Report on any volumes extracted from weir.	The Water Reform and Other Legislation Amendment Act 2014; The Water Act 2000
Report management plan	DLGP	All of WSP	Annual		Report on GRC WSP's asset management plan	Queensland Local Government Act 2009
Drought management plan	DEWS	All WTPs	Annual	1 October	Report on GRC WSP's drought management plan	The Water Supply (Safety and Reliability) Act 2008
Water supply continuity	DEHP & DEWS	All WTPs	Quarterly	2 year preview	Report on Council's projected ability to provide continuity of supply, based on state of water sources, projected into the future for 2 years	The Water Supply (Safety and Reliability) Act 2008

SUMMARY OF WATER AND SEWERAGE BRANCH REPORTING REQUIREMENTS						
Report	To	Area	Regularity	Timing	Nature of Reporting	Regulation/Act
Water loss management plan	DEWS	All of WSP	Annual	1 October	Analysis of each system within WSP to determine volume of losses over period. Report on trends and rectification actions, if required.	The Water Supply (Safety and Reliability) Act 2008
Irrigation management plan reporting	DEHP	All irrigation sites	Annual	By 31 July	Annual report for each site treated effluent is irrigated to, including third parties' sites where applicable.	The Water Supply (Safety and Reliability) Act 2008; Environmental Protection Act 1994
Receiving environmental monitoring programme reporting	DEHP	All point sources	Annual	By 31 July	Report on annual monitoring program, including commentary and rectification action planning and continuous improvement	Environmental Protection Act 1994