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# Postal Services Modernisation- Discussion Paper

Electoral Commission South Australia (ECSA) submission  
**2023**

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# **1. ECSA submission to The Department of Infrastructure, Transport, Regional Development, Communications, and the Arts.**

## **About ECSA**

The Electoral Commission of South Australia's purpose is to provide independent quality electoral services for South Australians. This is supported by the powers and functions detailed under various Electoral Acts and Regulations.

ECSA ensures the trust and confidence of political participants and citizens alike, to protect and enhance the integrity and performance of its electoral systems across the state. ECSA is dependent on the services of Australia Post to meet its statutory obligations and requires ongoing reliable, timely, and cost-effective letters services to maintain confidence in South Australia's electoral systems.

## **Background**

This submission is provided to The Department of Infrastructure, Regional Development, Communications, and the Arts in addition to the collective views of the Electoral Council of Australia and New Zealand but provides further on the South Australian context.

It is important to note that ECSA is only commenting on its operational experiences and expertise, to highlight matters for government consideration with a particular focus on ensuring there is an efficient and cost-effective national letters services for South Australians.

Elections conducted in South Australia have a significant reliance for frequent on-time, value-for-money letter delivery services provided by Australia Post, both for the purpose of election awareness materials sent to households, and to enfranchise electors who chose to, or are required to in State and Local Government elections, cast a postal ballot.

Recent State elections held in South Australia has seen a considerable increase in the number of electors choosing to vote by postal ballot. As an example, at the 2022 State election, postal votes made up 11.3% of the voting method, in comparison to the 8.5% of postal voters at the 2018 election.

While the COVID-19 pandemic has most certainly had an influence in the rise in electors choosing to vote by postal ballot, other factors, including the sophisticated and targeted campaigns conducted by Registered Political Parties and the absence of other solutions that are financially feasible and/or technologically secure, will continue to result in the postal ballot being a choice of voting method for many South Australians in the foreseeable future. Along with early voting, electors view postal voting as a more convenient method by which to cast their vote without the need to attend a polling booth on election day.

## South Australian State elections

As in all states and territories, elections are an essential service, and the reliance on frequent letter services are a core delivery channel within South Australia. In the context of South Australian elections, ECSA uses Australia Post's letter services for a range of key functions, including the following:

- The return of completed postal vote applications from electors for State and By elections
- Providing electors with postal ballots at all electoral events (State, local government and industrial).
- The return of completed postal ballots from electors across the various events previously mentioned.
- Promotion of electoral awareness through the letter service to each household or each elector ahead of, or in the early stages of, electoral events.
- Compliance activities such as revision of the register of declaration voters and 'failure to vote' notices, noting ECSA is generally restricted to using the mailing address recorded on the electoral roll to initiate contact with enrolled citizens.

Postal voting is an important and popular part of voting at South Australian state elections. At the 2022 Election 171,687 applications were received compared to 102,974 for the 2018 and 89,714 for the 2014 State Elections.

Electors who were unable to attend a polling booth in person could access a postal vote application from any Australia Post outlet, by phoning ECSA to request a form be posted to them, by downloading a form from the ECSA website or by obtaining a form from a political party.

In the 2022 State Election, 25,610 electors who, for various reasons, automatically receive their postal votes as they are registered declaration voters, including postal packs to electors located overseas at the 2022 State Election.

Postal voting timeframes used at the recent state election have been impacted by a number of issues that have highlighted the requirement for on-time frequent services. The prescriptive regulatory timeframes relating to the last receipt of a citizen's application for a postal ballot, which is two (2) days before election day, deems it unlikely that a postal ballot would be received by the citizen too late for the completion no later than 6.00pm on election day and return of the ballot within seven (7) days to be accepted and counted. ECSA are reliant on Australia Post having staff available on the Saturday following polling day to be able to collect any mail.

Any further change to the regularity of letter delivery services will have a real and direct impact on ECSA's ability to deliver postal ballots on time. ECSA is experiencing significant risks in effectively delivering their statutory obligations relating to postal voting using letter service in recent elections, including successfully enfranchising electors who rely on this service to cast their vote.

## South Australian Local Government elections

In accordance with legislation, Local Government elections in South Australia are solely conducted by postal ballot and have electoral timetables that are generally unmovable. In 2022, over 1.3 million letters were sent to electors across the state for the 67 local government councils, which elections costs are cost recovered from the relevant local government council. These costs in turn are passed on to electors, for instance through increased costs from councils to their ratepayers.

The concept of relaxing letter delivery frequency requirements is inconsistent with the postal voting services which ECSA must provide. Such a relaxation threatens the viability of that voting channel which, for many South Australian electors in rural and remote areas, represents the only available and cost-effective means of voting.

### Summary

Through this submission, ECSA has sought to highlight the reliance's it has with the Australia Post letter delivery service as it currently stands.

This submission was also to highlight ECSA's reliance on its regulatory frameworks which require the use of letter service, with the most important of these services relating to postal voting in elections which all indications indicating that this demand will not decline.

South Australians will continue to require daily mail dispatch during major electoral events, and all electors will continue to need easy access to postal facilities to return completed electoral material. Given the timing and scale of South Australia's major electoral events are known in advance, it is hoped that letter services offered by Australia Post could be aligned to meet these requirements like other recognised surge periods i.e., Christmas.