

an initiative of

Institute of Public Works Engineering Australasia, Queensland
Local Government Association of Queensland
Local Government Managers Australia
Australian Water Association

Attention:

Rachel Blackwood

A/g Assistant Secretary, Spectrum and Telecommunications Deployment Branch
Department of Infrastructure, Transport, Regional Development and Communications
GPO Box 594
Canberra ACT 2601

Dear Ms Blackwood,

SUBMISSION: AMENDMENTS TO THE TELECOMMUNICATIONS CARRIER POWERS AND IMMUNITIES
FRAMEWORK – TRANCHE ONE

The Queensland Water Directorate (*qldwater*) is a business unit of the Institute of Public Works Engineering Australasia Queensland. Our 72 members include the majority of councils, other local and state government-owned water and sewerage service providers, and affiliates. As the central advisory and advocacy body within Queensland's urban water industry, *qldwater* is a collaborative hub, working with its members to provide safe, secure and sustainable urban water services to Queensland communities. Major programs focus on regional alliances, data management and statutory reporting, industry skills, safe drinking water and environmental stewardship.

The Department of Infrastructure, Transport, Regional Development and Communications has prepared exposure drafts of amendments to the Telecommunications Code of Practice 2018 (Code of Practice) and Telecommunications (Low-impact Facilities) Determination 2018 (LIFD) to assist stakeholder understanding of the effects of the proposed changes.

This brief submission is in response to the invitation to provide stakeholder feedback on the substance and operation of the proposed changes. It may be made public.

1. *qldwater* is a signatory to the submission made by the Water Services Association of Australia (WSAA) on behalf of the Australian water industry and contributor to the extensive submission made by Seqwater and fully supports the content and intent of those documents.
2. Thank you for the opportunity to meet with departmental representatives as part of the tranche 1 consultation process on 16 March 2021 and the productive discussion. I would like to note that the statements made around the past WSAA submission only "counting" as 1 of 49 submissions is a completely inappropriate measure to apply.



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The WSAA should be commended for leading an initiative to coordinate and consolidate feedback on these proposed amendments on behalf of the water industry, essentially saving the Department significant resources by supporting organised and efficient consultation in a timeframe which simply does not allow for full participation by impacted water utilities. Many of our members are very small organisations.

It is preferred that the department group and consider submissions on an industry basis. The current approach to assessing submissions by DIRTDC risks failing to address the broader community impacts that industry submissions represent. This may result in a poor outcome in terms of overall cost to taxpayers from potentially failing infrastructure and risks to the safety of workers and the community. Further, it risks failing to address the broader community impacts that industry submissions detail.



Contact:



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