



Central

Local Government Region of South Australia

Incorporated under provisions of the Local Government Act

ABN: 34 728 242 315

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Mayor James Maitland

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Member Councils:
The Barossa
Barunga West
Clare & Gilbert Valleys
Copper Coast
Flinders Ranges
Goyder
Light Regional
Mallala
Mount Remarkable
Northern Areas
Orroroo/Carrieton
Peterborough
Port Pirie Regional
Wakefield Regional
Yorke Peninsula

Paul Kerin
Chief Executive Officer
Essential Services Commission of SA
GPO Box 2605 Adelaide SA 5000
www.escosa.sa.gov.au

13th May 2013

ESCOSA REPORTING GUIDELINE NUMBER 3

Dear Mr Kerin,

Thank you for the opportunity to provide feedback to your draft Water Industry reporting requirement guideline (number 3) and for ESCOSA's attendance at workshops held with Councils on this issue at Balaklava and Jamestown in mid March.

The Central Local Government Region represents the interests of its fifteen rural member Councils in South Australia, spanning the Flinders Ranges to the Barossa and Clare Valleys, the Yorke Peninsula, Adelaide Plains and Mid North.

The smallest of our Councils has a rate revenue of just under \$1 million and a workforce of under 30.

It is noted that the draft guideline sets out information on financial reporting requirements for intermediate and minor licensees and also sets out proposed operational performance requirements to be reported annually in relation to issues such as timeliness of response to telephone calls; customer complaints, restrictions and legal action for non payment, financial support measures, price movements, water and sewerage infrastructure reliability, along with other statistical information.

It is understood that the information collected under guidelines will allow the Commission to monitor compliance with financial and operating performance frameworks, and will form input into ESCOSA's Water Industry Annual Performance Report.

During the Commission's initial regulatory period (2013-2017), we very much encourage a close liaison and flexible approach to working with smaller Councils, with a view to refining, simplifying and streamlining reporting requirements to minimise the resourcing implications.

It is also recommended that wherever possible, additional reporting required of Councils is considered and consolidated through the South Australian Government's Local Government Grants Commission annual returns, as a 'one-stop-shop' for local government financial reporting information.

Whilst the need for greater transparency and national consistency in water pricing is appreciated, so too must the resourcing implications that the proposed additional reporting and compliance has on local government, particularly smaller, rural Councils.

This must also be understood in the context of similar requests made continually by a range of other agencies and the cumulative impact on resourcing of small Councils with limited capacity to raise rates.

In the past six months alone, Councils have been required to undertake additional planning, reporting and compliance functions passed on by other levels of government for tasks relating to the *South Australian Public Health Act 2011 and wastewater regulations*; access permits under the National Heavy Vehicle Regulation; amended guidelines under the *Dog and Cat Management Act 1995*; delegations under the *Safe Drinking Water Act 2011* and regulations; *Development (Private Certification) Amendment Act and Regulations*; SA Health Review of Non-Hospital Based Services; *Native Title Amendment Bill*; *Controlled Substances (Poisons) Variation Regulations 2013* and Draft Vaccine Administration Code; changes to draft model financial statements 2013 under the *Local Government (Financial Management) Regulations 2011*, delegations under the *Water Industry Act*; amendments under the *Development (Trusses) Variation Regulations*; *Statutes Amendment (Penalties Enforcement) Bill 2012*; *Burial and Cremation Bill 2012*; *Environment Protection (Waste to Resources) policy*; amendments to *Liquor Licencing regulations*; *Independent Commissioner Against Corruption Act 2012 (SA)*; *Native Vegetation (Miscellaneous) Amendment Bill 2011*; amendments to the land administration system, the *Development Regulations 2008* and *Building Rules Assessment Processes*; swimming pool safety inspections and arrangements, *Fire and Emergency Management Act 2005*; arterial street lighting costs under the *Highways Act 1926*, proposed amendments under the *Local Environmental Nuisance Bill 2012* and additional reporting under the *Land and Business (Sale and Conveyancing) Regulations 2010*.

In addition, Councils are faced with increasing financial pressure as a result of recent withdrawal of funding support for local services such as specialist heritage advice, regional development, sport and recreation and libraries.

Thank you again for the opportunity to comment. We would welcome ongoing dialogue with your office during the implementation of the new arrangements in order to minimise the resourcing impact on our Councils.

Should you require further information, please feel free to contact me by email: ceo@centralregion.sa.gov.au or by phone: 0427609404.

Yours sincerely



Anita Crisp
Executive Officer