

# Town Water Risk Reduction Program Proposed Incident and Emergency Management Framework for Local Water Utilities

July 2022



**CENTRAL NSW  
JOINT ORGANISATION**

- Bathurst
- Blayney
- Cabonne
- Cowra
- Forbes
- Lachlan
- Oberon
- Orange
- Parkes
- Weddin



Central NSW  
Joint Organisation  
PO Box 333  
Forbes NSW 2871  
Phone: 0428 690 935

Email: [jenny.bennett@centraljo.nsw.gov.au](mailto:jenny.bennett@centraljo.nsw.gov.au)  
Website: [www.centraljo.nsw.gov.au](http://www.centraljo.nsw.gov.au)

Chair Cr Kevin Beatty, Mayor, Cabonne Council

19 July 2022

Reference: mm:jb 220719  
Enquiries: Ms J Bennett: 0428 690 935

Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

By email: [regional.town.water@dpie.nsw.gov.au](mailto:regional.town.water@dpie.nsw.gov.au)

**Re: Town Water Risk Reduction Program Proposed Incident and Emergency Management Framework**

Local Government Regional Joint Organisations (JOs) were proclaimed in May 2018 under the NSW Local Government Act 1993. The Central NSW Joint Organisation (CNSWJO) represents over 200,000 people covering an area of more than 50,000sq kms comprising the Local Government Areas of Bathurst, Blayney, Cabonne, Cowra, Forbes, Lachlan, Oberon, Orange, Parkes, Weddin, and Central Tablelands Water.

Tasked with intergovernmental cooperation, leadership and prioritisation, JOs have consulted with their stakeholders to identify key strategic regional priorities. The CNSWJO Strategic Plan can be found here: [https://docs.wixstatic.com/ugd/51b46b\\_31886650ecf546bc916f15e99a733b3e.pdf](https://docs.wixstatic.com/ugd/51b46b_31886650ecf546bc916f15e99a733b3e.pdf)

This region welcomes the opportunity to respond to the Town Water Risk Reduction Program's - Proposed Incident and Emergency Management Framework for Local Water Utilities (LWUs).

Arguably, LWUs have greater capability in managing incidents as a result of assurance frameworks like the NSW Health Drinking Water Quality Management Plans. This includes, in the Central NSW region, managing turbidity as a result of flooding events. Having said that there is still room to move on better communication and management of boiled water alerts where Councils still report this process as opaque.

Importantly, Councils and the State more broadly struggle to manage in natural disasters. It is this region's view that DPE Water does not have expertise in this area and should work across agencies on how best to run disaster simulations and build capacity in Planning, Preparation, Response and Recovery (PPRR) in place.

CNSWJO has been coordinating 8 JOs across regional NSW in a collaboration on PPRR and through this process has discovered duplication, poor coordination, poor planning and preparedness across both Local Government and the State. Lessons learned is completely missing where for example, this JO has been asking for over two years for a lessons learned piece to be undertaken on Covid.

Further, as this region continues to suggest – drought is the poor cousin in emergency management. It has no place under the Resilience NSW framework, is considered poorly in the Regional NSW framework and has no place based coordinated response supported by DPE Water at this time.

*The Central NSW JO speaks for over 157,000 people covering an area of more than 47,000sq kms comprising of Bathurst, Blayney, Cabonne, Cowra, Forbes, Lachlan, Oberon, Orange, Parkes, and Weddin.*

Finally, there is potential for DPE Water to support Councils in embedding PPRR in their existing regulatory framework – Integrated Planning and Reporting (IP and R.) This region’s view is that by integrating strategic planning for water into IP and R there is a greater likelihood of integration of business continuity planning and other elements of PPRR into the existing regulated framework.

Regarding the 5 questions asked, the focus is on natural disasters.

**1. Does the framework support local water utilities to manage risks posed by incidents and emergencies? How could the Framework be improved to better support utilities?**

The framework does not reflect the emergency management framework in NSW. There is no mention of Resilience NSW or of the fragmented nature of PPRR. The heart of the issue is poor structure and poor coordination. There is no lessons learned framework of any significance and limited capacity in poorly resourced LWUs with critical roles in ensuring quality secure drinking water through a natural disaster. Business continuity planning across the region is variable. The draft framework as provided needs a rework – it is suggested that industry leaders like the NSW Water Directorate and members of the CNSWJO Water Utilities Alliance (CWUA) who are Local Emergency Management Officers (LEMOs) could be useful where the authors of this response are not subject matter experts.

**2. Which areas of incident and emergency management should be prioritised for improvement?**

- a. Coordination – it is imperative that the State leads the broad-brush work required on who is doing what regarding natural disasters–DPE Water and Councils will have roles and should have input. An example of the existing confusion is that Ministers are being informed that all Regional Leadership Executives have a subcommittee coordinating resilience. That is not the case in this region.
- b. Planning – there is scope for effectiveness and efficiencies to be realised through well designed place-based plans coordinated through the planning regions.

**3. What guidance material should the department develop to help a local water utility effectively develop local incident and emergency management processes?**

Codesigned guidance using industry leaders would be very welcomed. In the first instance a scan ought to be undertaken on what already exists. It is understood that Resilience NSW has aspirations in this area.

**4. What training and support would a local water utility need to effectively implement this framework? What should the department’s role be in providing this training and support**

In collaboration with other State agencies and stakeholders, well designed regular regional and local disaster management training exercises involving council officers and staff at all levels would be welcomed. Some field work could be very valuable in progressing the anticipated cultural change and building capacity for DPE Water. This is particularly critical for drought where this region has for some time recommended that the appropriate State agencies ought to be in a constant cycle of PPRR regarding drought in accountable and transparent structures.

**5. Should the department assess local water utilities’ incident and emergency management processes to ensure risks are managed?**

No – however, supported self assessment is worthwhile in an accountability framework. DPE Water does not have knowledge experts in PPRR at this time. This region’s preference is that they skill up in supporting PPRR rather than resourcing assessment as it has been our experience that where an agency has both a support and a regulatory/assurance role – it tends to gravitate resourcing to regulation/assurance.

*The Central NSW JO speaks for over 157,000 people covering an area of more than 47,000sq kms comprising of Bathurst, Blayney, Cabonne, Cowra, Forbes, Lachlan, Oberon, Orange, Parkes, and Weddin.*

We thank you for the opportunity to provide comment. For further advice or to discuss any matters raised in this response please do not hesitate to contact me on 0428 690 935 or email me on [jenny.bennett@centraljo.nsw.gov.au](mailto:jenny.bennett@centraljo.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink that reads "Jennifer Bennett". The signature is written in a cursive, flowing style.

Jennifer Bennett

**Executive Officer**

Central NSW Joint Organisation (CNSWJO)