

Your ref: Land Planning E-Sewerage

Honourable Justice Catherine Holmes
Commissioner
Queensland Floods Commission of Inquiry
PO Box 1738
Brisbane QLD 4001

9 December 2011

Dear Commissioner

Outcomes of Flood Inquiry – Review of Draft Report

Unitywater thanks the Queensland Floods Commission of Inquiry for the opportunity to provide an assessment of its draft report and recommendations in relation to sewerage.

Overall, Unitywater accepts the Commission's report and recommendations.

Unitywater suggests that the Commission give further consideration to:

1. The Role and Responsibilities of Local Government in Rectification of Illegal Stormwater Connections to the Sewerage Network and Defects in Private Sewage Drainage Pipes.

In its report the Commission indicates the adverse impact of inflow to sewers from illegal connections which permit entry of rainwater or stormwater to the sewer. The Commission's report correctly attributes overflowing sewers to such inflow as sewers are not designed or intended to accept such flows – this is the purpose of local governments stormwater drainage system. Hence, the rectification and prevention of such illegal connections to the sewer network is vital to containment of sewage and thereby protection of public health.

The Commission's report (Section 1.7) expresses some uncertainty about the impact of illegal connections. Please note that Unitywater has been conducting surveys of its sewer network since its inception in July 2010.

Unitywater has identified 121 properties (out of 2350 properties involved in the survey area) in Caloundra (one commercial property with the stormwater drain from a large carpark connected to sewer) and 10 % of the connected properties in Woodford having illegal connections to sewer.

Unitywater is continuing this inflow detection survey work and expects to find similar numbers (5% to 10%) of properties with illegal connections in all sewerage catchments. Unitywater considers that illegal connections are a problem which must be addressed to reduce load on the sewer network in wet weather.

The Commission's draft report details the relative responsibilities of local governments and distribution retail authorities in South East Queensland with respect to prevention and

rectification of illegal connections. The report correctly identifies that local government in South East Queensland no longer has responsibility for management of sewer networks while distribution retail authorities do not have any control over plumbing and drainage works on private property. In view of the need to prevent and rectify illegal connections it is apparent from the draft report that it would be beneficial to formally establish the responsibilities of local government and distribution retail authorities in this regard.

Local Government has the statutory responsibility of approving plumbing and drainage infrastructure on private property. Hence, local government Plumbing and Drainage Inspectors are in a position to observe illegal connections and participate in prevention and rectification of such illegal connections by reporting the matter to Distribution Retail Authorities and or other sewerage service providers as relevant.

In addition, local government could assist sewerage service providers in investigations about illegal connections by providing information about defective works that would enable prevention of future occurrences of or rectification of existing illegal connections. Such information should include the name of the person and/or company responsible for installation of the illegal connection.

Recommendation:

The Queensland Floods Commission of Inquiry include in its report a recommendation that Local Government be authorised and required to proactively assist sewerage service providers in prevention and rectification of illegal connections to sewer networks including provision of information about the person(s) or company responsible for installation of the illegal connection.

2. Authority of Distribution Retail Authorities to Enter Property to Detect Illegal Connections

In evidence to the Commission, Queensland Urban Utilities suggested that an extension of the statutory powers of Distribution Retail Authorities, like Queensland Urban Utilities, under the *Water Supply (Safety and Reliability) Act* (the Act) to allow Distribution Retail Authorities to enter private property and investigate if illegal connections exist on private property and, if so, to require their removal.

Unitywater supports Queensland Urban Utilities' proposal for amendment of the Act to enable authorised personnel to enter private property for investigation purposes.

This Act currently provides powers to Distribution Retail Authorities to order removal of illegal connections but no prosecutory powers and no authority to enter private property for detection of unauthorised connections to the Distribution Retail Authority's infrastructure. Hence, Unitywater considers that amendment of the Act is necessary to have reasonable powers to protect its infrastructure and private property which may be damaged by sewers overflowing because of inflow from illegal connections.



Unitywater

Recommendation:

The Queensland Floods Commission of Inquiry include in its report a recommendation that the Queensland Government amend the Water Supply (Safety and Reliability) Act to provide powers to the Distribution Retail Authorities to enter private property; under a programmed inspection notice, for the purposes of detecting and rectifying illegal connections (with prosecutory powers) to sewerage infrastructure.

3. Timing of Audit of Electrical Infrastructure

The following recommendation appears in Section 1.5 of the Commission's draft report.

Draft recommendation

Authorities responsible for the construction of sewerage infrastructure should when embarking on new works, undertake risk and cost/benefit assessments to determine the level at which electrical infrastructure that may be vulnerable to inundation should be placed.

Authorities responsible for the management of sewerage infrastructure should conduct a review of their existing infrastructure to identify electrical infrastructure that may be vulnerable to inundation and perform risk and cost/benefit assessments to determine the level at which it should be placed.

Unitywater is in agreement with the Commission's recommendation. However, it would be beneficial if the Commission indicated in its report that in view of the known impacts of the flood on electrical components of sewerage infrastructure and the consequent response of sewerage service providers to rectify and mitigate impacts of flooding on electrical equipment, the audit referred to in the Commission's recommendation be undertaken as part of planned works and that a Distribution Retailer Authority develop a program of works which will need to be completed within, say five years, to rectify such instances rather than a matter of immediate priority.

It is suggested that this is reasonable given that in some instances survey (levelling) and flood modelling work may be necessary to check flood immunity followed by rectification works.

In these instances it would take at least two years to do the necessary investigation work, establish prudence and efficiency of proposed solutions, obtain funding approval and undertake works.



Unitywater

Should the commission require clarification of the matters detailed above or other information please contact [REDACTED], Manager Strategic Planning & Asset Management on [REDACTED] or by emailing [REDACTED]@unitywater.com .

I trust this submission is of assistance to the Queensland Floods Commission of Inquiry.

Yours Sincerely



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