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**27 Apr 2015**Finance and  
Administration Committee

27 April 2015

The Research Director  
Finance and Administration Committee  
Parliament House  
George Street  
Brisbane Qld 4000

Email: [fac@parliament.qld.gov.au](mailto:fac@parliament.qld.gov.au)

Dear Sir/Madam

**Submission on *Payroll Tax Rebate, Revenue and Other Legislation Amendment Bill 2015***

Thank you for the opportunity to provide a submission to the Finance and Administration Committee on the Payroll Tax Rebate, Revenue and Other Legislation Amendment Bill 2015 (the Bill).

As you will be aware, the Central SEQ Distributor-Retailer Authority, trading as Queensland Urban Utilities, is a statutory authority established as a "distributor-retailer" pursuant to the South East Queensland Water (Distribution and Retail Restructuring) Act 2009 (QLD).

Queensland Urban Utilities operates in a highly regulated environment where safety and public health concerns are our highest priority in delivering water and wastewater services in our geographic service territory, being the local government areas of the Brisbane City Council, Ipswich City Council, Lockyer Valley Regional Council, Scenic Rim Regional Council, and Somerset Regional Council.

**Installation of Water Meters**

Queensland Urban Utilities' submission is directed at the proposed amendments to the *Plumbing and Drainage Act 2002* (PD Act) and the *Water Supply (Safety and Reliability) Act 2008* (WSSR Act) relating to installation of water meters. The amendments proposed mean that Queensland Urban Utilities would need to engage a licensed plumber to install a "relevant water meter" to avoid an offence under the PD Act.

Traditionally, any work relating to relevant water meters, including installation work was lawfully undertaken by Queensland Urban Utilities' "authorised persons" under the WSSR Act (i.e. our contractors and employees). While licensed plumbers face individual penalties (fines and possibility of losing licenses) for failing to carry out works adequately or for causing quality issues, Queensland Urban Utilities currently bears the ultimate responsibility for its employees and contractors as a

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water service provider, with significant penalties being applied to Queensland Urban Utilities for non-compliances (1665 penalty units).

Queensland Urban Utilities' employees and contractors involved in the installation of water meters as authorised persons are highly skilled and undertake extensive training and certification which is mandated as part of their roles as water industry workers. As such, if the proposed new section 121 (1)(e) of the PD Act and complementary amendments to the WSSR Act are not enacted by Parliament, Queensland Urban Utilities is confident that our employees and contractors are capable of safely installing and working with our infrastructure.

Queensland Urban Utilities is very pleased that:

- the Bill clarifies that the role of a plumber relates to meter installation and not to repair, maintenance or replacement of a meter;
- new section 121(1) (e) allows Queensland Urban Utilities' authorised persons to remove, replace or repair a relevant water meter under section 36 of the WSSR Act without committing an offence under the PD Act; and
- the proposed definition of "plumbing work" in the Bill and the Explanatory Notes for the Bill (page 54), has clarified that the installation of bulk and other water meters which form part of Queensland Urban Utilities' broader network and which are not relevant water meters, is not installation work which would require a licensed plumber to handle.

### Implementation

Queensland Urban Utilities is greatly concerned that we will not be in a position to immediately comply with the proposed obligations once the Bill is enacted. As such, Queensland Urban Utilities would very much benefit from a reasonable transitional moratorium period to:

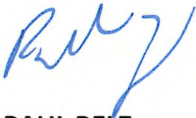
- establish and fund a program of work to implement new business systems, processes and sourcing arrangements (including possible re- negotiation and variations to existing arrangements);
- deal with a range of employee issues (including training, certification and further resourcing needs); and
- ensure continuity of its business operations in servicing the community.

We are therefore encouraged by Parliament's inclusion of transitional provisions which support a staged implementation program, whereby suitable competent employees and contractors can continue to install water meters for a 2 year period as authorised persons under the WSSR Act. While the financial and process change impact of the proposal is not insignificant for Queensland Urban Utilities (being transitional costs, resourcing impacts, ongoing budget impacts and cost to end user customer impacts), the changes to our business to give effect to the Bill will be manageable by expiry of the 2 year transitional period.

I am happy to elaborate on these comments if required. Queensland Urban Utilities welcomes the opportunity to provide written clarification or to be involved in further consultation.

Should you require any further information please do not hesitate to contact me on telephone 07 [REDACTED]

Yours sincerely



**PAUL BELZ**  
**Acting Chief Executive Officer**  
**Queensland Urban Utilities**