

# THE DIFFICULTIES FACED BY SMALL REGIONAL WSPS

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## ABSTRACT

Small regional WSPs are not alone in having many problems to overcome. Their size presents problems for them, as does their often-remote nature. These two things would come as no surprise to anyone who has spent a few moments thinking about it and both are in themselves almost impossible to solve. If we were to leave our analysis at that, it would greatly oversimplify the nature of the difficulties they are trying to find solutions for and leave these solutions further away than they need to be.

The focus of this discussion will be some of the other factors that come into play because of their remoteness and size. Focussing on institutional problems being created by the city-centric nature of our modern society and the way this creates some of the biggest issues for the small regional WSPs, it will demonstrate the need for a change against current trends in the way centralised systems are created, reviewed and applied to account for those outside major centres.

## 1.0 INTRODUCTION

There are two sorts of regional water managers these days. One sort is so busy trying to do everything that regulation and internal systems require of them that they have no time for anything else. They spend all their time trying to do the best they can to meet a plethora of competing imperatives. And, although they do a mighty job, they often have plenty of uncompleted issues to focus on still at the end of the day, the week, the month or the year. The other sort is not that different, albeit more annoying from some perspectives. They find themselves in the same position as the first group but differ in that they still believe that time spent working with the propagators of the systems that drive the excessive demands upon them (or against them if necessary) pays better dividends than just working with too few resources in vain to comply with everything being asked of them. As such, they take an animated role in the state and/or federal levels of their industry, often making nuisances of themselves as they present inconvenient points of view on all sorts of topics that otherwise might be considered “the norm” in the greater industry.

I’m sure many of the people who meet this second sort of manager wonder why they are like this. The answer, in simple terms, is that they recognise that of the many issues they are trying to overcome, the issues that blanket regulation and standards present should be one of the simplest to solve and provide the largest returns on the expenditure of limited resources (their time). These issues are also additive, and often multiplicative in nature as well, increasing the resources it takes to solve other more intransigent problems they overlay. It is not unusual for a regional water manager to spend the whole week working hard, and still achieving nothing in a practical sense. Then they might work another 20-50% over and above their nominal hours to actually get something done. Sadly, even some of this time can be eaten up with more “red tape” too. Depending on how you do the math, you end up with very low, or negative, efficiency levels at the end of the day.

## 2.0 DISCUSSION

ALL WSPs have plenty of issues to keep them busy. Shared issues include managing public perceptions, political considerations, emergencies and disasters, supply crises, meeting regulations, sourcing and keeping trained staff, and financial and economic pressures, and catching up on work that should have been done in the past and wasn’t.

Outside Southeast Queensland, there is additional and/or greater pain, also shared. Sourcing and keeping trained staff against mining money, meeting city-centric regulations, financial and economic pressures from less economies of scale, managing public perceptions in smaller communities, geographic remoteness political isolation and limited voice, lower social-economic customer-base, and catching up on work that should have been done in the past and wasn't.

In small/medium WSPs there is additional and/or greater pain, also shared. Meeting city-centric/population centred regulations, sourcing and keeping trained staff against mining money in rural areas, shared resources (with Councils), managing public perceptions in close communities, financial and economic pressures from no economies of scale, geographic isolation, political isolation and limited voice/relevance, much lower social-economic customer-bases, and catching up on work that should have been done in the past and wasn't.

## 2.1 Disclaimer

It may soon sound like I don't believe in standards, regulations, or any form of quality control or safety measures. I do! These things are essential to an ordered and efficient society. We can't operate without them. But that doesn't mean we are doing them well at the moment, or that they can't become counterproductive taken too far. Or that we can't make changes when the problems are pointed out.

## 2.2 Regulation and Standards

You will notice the order of the challenges changes once you get outside of SEQ (and often from WSP to WSP too). In my opinion, these are the biggest difficulty we face in small regional WSPs currently.

**Regulation:** a rule or directive made and maintained by an authority (regulator).

**Standard:** a required or agreed level of quality or attainment

## 2.3 Defining the Most Pressing Problem

The proliferation of standards and regulations constitutes a large part of the problem. These are growing as they apply across more specialist disciplines. It is hard to keep up and maintain competency and currency for those who must deal with these many areas. As a result, there are more specialists required than positions available in most regional structures.

The "organic growth" of standards and regulations, the fine detail and specific treatments that make their way into the documents over time leave little, then no, room improvise or engineer other solutions that may be necessary and suitable under varying circumstances. And many inclusions simply don't apply universally at such fine detail levels. They often don't consider what may be "reasonable" in varied situations. The bush is a very different environment to the workplace of many who are generally able to work on the development of these sorts of projects. The thinking behind them is therefore very city centric.

More and more there is a centralisation or unification of standards, from town to regional, to state-wide, to national, to global. This necessarily narrows the options available and further limits reasoning and skills being applied on the job.

Australia's impressions of/attitudes to standards makes this even more troubling. With goading from the media, the public think of standards as laws. In fact, many don't even realise that, in the same way that the Reserve Bank is not a government institution, neither are the businesses that develop, maintain and distribute standards. Hence, the public treat them like infallible laws, especially when something goes wrong. They are easily lead down a pathway of blame by media sensationalism. So much so that the "media test" has replaced the "pub test" one of the key measures in determining risk in this country now. The media and their entranced audience don't understand the critical difference between "best practice" and fit-for-purpose (practical) systems and measures. This creates huge, uncontrollable risks for those who must operate outside what is printed in these documents.

The way all the other issues we face play off this one makes it the key risk in our operations currently. Its effects are both cumulative and multiplicative, so anything we can do to minimise it is the most efficient use of our time.

## 2.4 Examples

In Queensland, the adoption of Austroads standards regarding Traffic Management Plans, saw TMR ignore consultation responses and continue with narrow (city-centric) views of their application throughout the state. Many councils can't train people to the new standards, or source qualified people in their regions to provide plans. Nor can they reasonably do so from outside the region, especially for emergency or reactive works. While these standards, now regulations, may make good sense in the city, they are not fit for purpose in much of the bush. They are often simply unattainable, and always add greatly to inefficiencies in their practice.

Recent changes to WHS Regulations around hydrogen sulphide exposure standards, lowering the standard by 90% without consultation means that, after a grandfather period, if you can smell it, you will be breaching the regulations. This has huge implications across the whole of the industry. Large organisations will struggle, not only to carry out work within compliance, but to maintain compliance around pumpstations in relation to public areas and private properties.

It is an even worse impost than the moratorium on jetting of asbestos pipelines, again arising out of no real consultation within our industry. We have all been left with little option to solve blockages in asbestos mains and painfully slow progress on solutions. The whole industry has a gun to its head over this issue and there have been extraordinarily little results from efforts to solve it.

Unfortunately, the Federal Government continues to sign agreements and treaties with the United Nations and their affiliates without any sensible consideration of the consequences. Emerging contaminants like PFAS are glaring examples of this. Although the Federal Government signs treaties, it then fails to limit import, manufacture and sale of these chemicals and then expects councils and WSPs to clean up their mess at waste receival sites and STPs. And find some way of cleaning it up so reusing and recycling everything else is possible as well.

Many so-called solutions to climate change are obviously unviable for rural and regional areas that are being forced to take up useless alternatives to current technologies. On close examination, it seems likely that in countries like Australia Sustainable Development Goals are far more likely to have the effect of ensuring people soon won't be able to live outside cities rather than ensuring people outside cities can have reasonable access to things

considered a human right.

## **2.5 Are these Insurmountable Problems?**

On the face of it, yes, these problems seem like they won't be fixed. Most people who could turn around these trends are far too sure of themselves to listen to the bush. A media driven population fed on newsbytes or social media has little attention and critical thinking ability to apply to what they hear is unlikely to be forgiving of those who do not comply. A divided society that is all too willing to believe in something that appeals to their belief bias and form tribal allegiances along the lines of those beliefs does not promote the understanding required to overcome these sorts of differences.

Logically however, there are no real reasons these problems couldn't be overcome. On a personal level, individuals can reason on the arguments of others different to them and find empathy. For example, you can sit and listen to others' experiences and allow your world view to be moulded to one influenced by things beyond your own experiences. You can make allowances for others different situations and accept their choice/need to do things differently.

As organisations, changes to the ways of thinking can enable changes that consider alternative ideas and arguments. For example, while it may make sense for a large organisation in the city to make certain policy or practice changes, they can recognise that what they are doing doesn't represent best practice to someone in a different situation. They can refrain from representing their methods as the only or best way of doing things. A good example of this is the code currently being developed for handling heavy rainfall and floods in sewage pump stations. It goes to the trouble of noting that the best practice it outlines may not be fit for purpose for all operators or circumstances, particularly small regional WSPs.

Hopefully, our society will turn around from the current momentum developing and recognise that tribalistic divisions are counterproductive and we all rely on each other to get things done, to continue to progress, and that progress may look different to different parts of society. Alternately, societal and economic crashes will eventually return sanity to the situation that is developing; it's inevitable as the city can't survive without the bush. For example, when people in the city can't get enough to eat because it becomes too costly to produce food and transport it from the bush, they are not going to be too worried if someone is chlorinating their artesian water supply or drinking rainwater from tanks.

## **3.0 CONCLUSION**

At one level, solutions lie in us finding a commonality of experience:

- Larger utilities supporting smaller ones without being overbearing
  - Return obligation on smaller WSPs to accept assistance graciously
- Including small players in developing standards and regulation
  - Return obligation on smaller WSPs to get involved
- True consultation,
  - Rather than tick-box consultation and then regulators doing what they wanted to do in spite of the feedback.
- Economic fairness
  - Provision of fair funding models that reflect the cost-of-service provision in the bush, rather than the lazy and disenfranchising solution of amalgamations

On another level, the solutions lie in choices:

- Individuals: listening and considering what the bush has to say, rather than perpetuating their single-minded ideas formed from their own experiences and/or the overarching narrative of the time
- Organisations: showing humility and remembering that there are other ways of doing things that may be best practice in different circumstances to their own, and always room for improvement, of even the best ideas
- Society: waking up to the fact that tribalistic divisions are counterproductive and we all rely on each other to get things done, to continue to progress and that progress may look different to different parts of society.

What will your choice be?