



**Redactions made by submission author**

Your ref:

Our ref: DWERDT1257685

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Dear Emma Forrest

**INDIAN OCEAN TERRITORIES LICENSING – WATER SERVICES LICENCE APPLICATION**

I refer to the application submitted by the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA) for a water services licence to operate potable water and wastewater services in the Indian Ocean Territories.

While the application outlines the role of DITRDCSA as the water service licensee and the arrangement with Water Corporation under the Service Delivery Agreement, it does not fully reflect the scope of potable water services provided from assets owned by the Commonwealth and operated by other entities.



Key points requiring amendment:

**Recognition of Additional Potable Water Assets and Operators**

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To ensure consistency [REDACTED] and compliance with the Australian Drinking Water Guidelines (ADWG, 2011), the licence application should be amended to include these potable water services and list [REDACTED] alongside Water Corporation as a recognised service provider.

**Alignment with ERA Licensing Guidelines and Public Interest Obligations**

Section 26 of the Economic Regulation Authority Act 2003 requires consideration of the long-term interests of consumers. Incorporating all entities providing potable water services from Commonwealth owned assets ensures transparency, accountability, and continuity of safe drinking water supply.

The proposed operating areas include [REDACTED]

[REDACTED] for drinking water quality protection. Acknowledging [REDACTED] associated infrastructure in the licence application aligns with ERA's water service licence application guidelines and supports the public interest.

**Consistency with Strategic Water Quality Protection Measures**

The [REDACTED] in accordance with ADWG standards. Including known operators of DITRDCSA assets in the licence application will facilitate implementation of these recommendations and ensure a coordinated approach to water source protection and emergency response planning.

**Recommendation:**

The ERA should require the applicant to amend the licence application to:

- Acknowledge [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
- Include potable water services provided from Commonwealth owned assets other than those operated by Water Corporation, [REDACTED]
- List the [REDACTED] as a recognised potable water service provider alongside Water Corporation.

These amendments will ensure the licence application reflects the full scope of potable water services in the Indian Ocean Territories, meets ADWG standards, and upholds the long-term interests of consumers.

Please do not hesitate to contact me should you require further clarification.

Yours sincerely

[REDACTED]

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