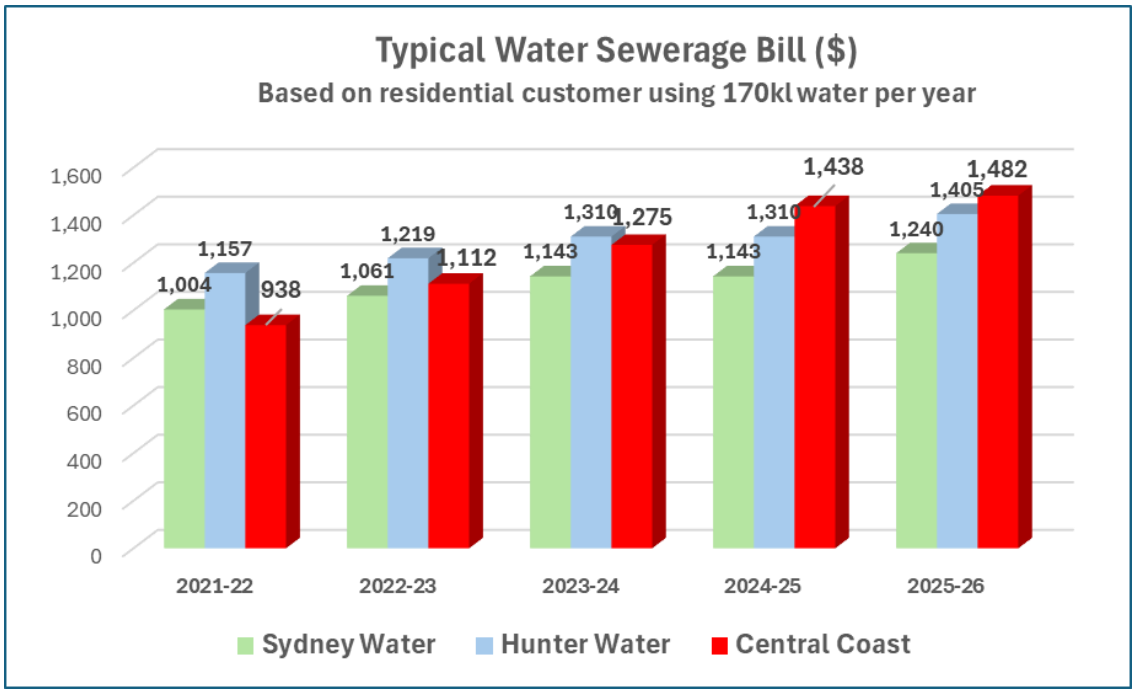
Submission to IPART

Central Coast Council's Water Pricing Proposal 2026/27 to 2031/32

1 POOR VALUE FOR MONEY

1.1 Central Coast water prices have already **increased 58% in the past four years**.

1.2 Central Coast prices are already 20% more expensive than Sydney, and 6% more expensive than Hunter for a worse service - even after new determinations for those two utilities took effect this year. Another 11.1% increase (8% plus inflation) for Central Coast in 2026/27 will widen this gap further and represent **poor value for money** for customers (see section 2 below on performance).



Source: Provided by email by IPART Director, Scott Chapman

1.3 Central Coast Council and IPART also need to be transparent that what is proposed for next year is a further 11.1% price hike (8% plus inflation). This is not what some of their published material is saying:

Council report (Sept Council meeting):
"The submission reflects a proposed price increase of 8% in the first year increasing by CPI in each of the remaining four years following...."

IPART issues paper heading page 8:
"CCC Water is proposing bills increase by 8.0% next year and then increase with inflation"

These statements by Council and IPART are inaccurate. The price increase is 8% plus inflation next year (likely 11.1%), followed by inflation thereafter, which is not the same as "8% this year plus inflation each year after."

1.4 IPART also needs to be transparent about the real increase sought by Council for this determination compared with the last determination.

The 2025/26 price (this year) was artificially inflated by the effect of phasing in the last determination.

Comparing next year's bill with this inflated final year bill (2025/26) from the last determination has the effect of lowering the percentage increase next year.

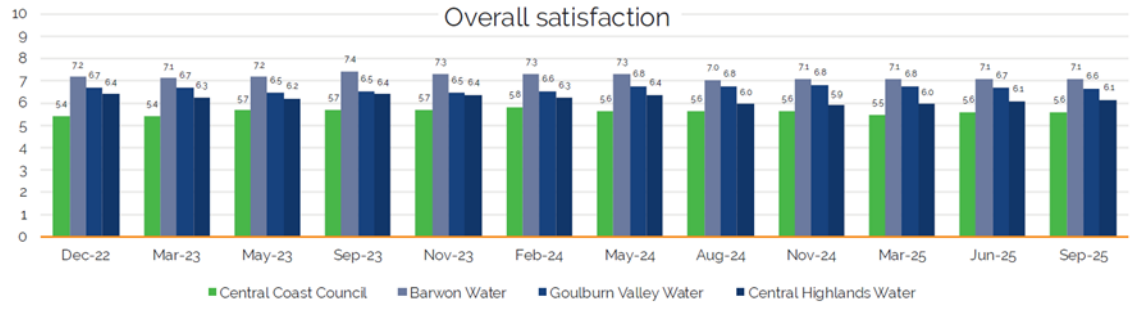
The real percentage increase in rates revenue, determination to determination, is actually 23%. Whilst some of this may have been driven by increased population, the real percentage increase in a typical bill, determination to determination, is nearer 23% than 8%.

Can IPART please be transparent about this and provide the real percentage increase determination to determination?

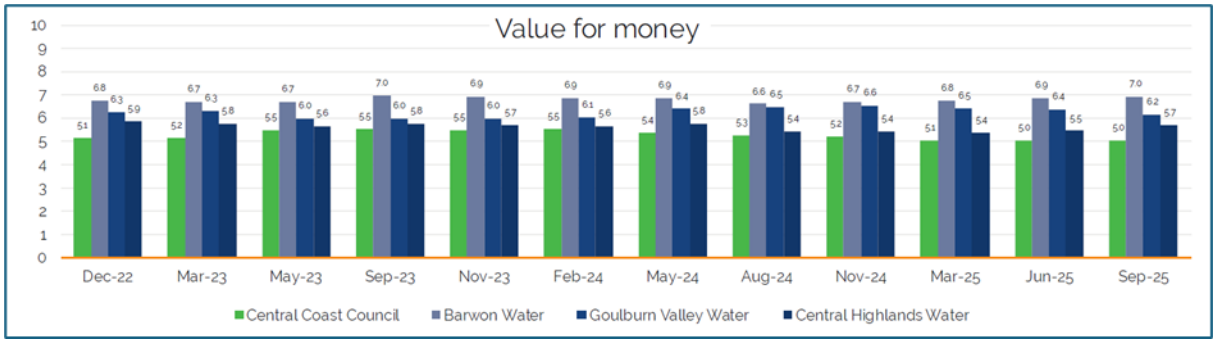
2 NO PERFORMANCE IMPROVEMENT DESPITE 58% PRICE HIKE

2.1 IPART's own **water utility customer satisfaction surveys** show there has been no improvement in performance despite the 58% increase.

Figure 1 Customer satisfaction results (annual rolling averages since December 2022) for Central Coast Council and comparators in Victoria



Note in Jan 2022, about the time the price hike was approved, overall satisfaction was 5.7. It was 5.6 in the last survey reporting September 2025.



Note in Jan 2022, about the time the price hike was approved, value for money was 5.4. It was 5.0 in the last survey reporting September 2025.

2.2 IPART acknowledged itself in the report accompanying these surveys that Central Coast performance had not improved and remained far worse than comparable utilities:

> For each of these areas, customer satisfaction was highest when we first began surveying Central Coast Council's customers in 2020-21, and then it slightly decreased. Over 2023-24, customer satisfaction began to increase to just below April-2021 levels. However, customer satisfaction has since declined and remained steady since May 2024, except value for money and trust which have been slowly declining since February 2024.
>
> We have compared Central Coast Council's results with 3 Victorian utilities which are similar in function and customer base: Barwon Water, Goulburn Valley Water and Central Highlands Water. Central Coast Council has not performed as well as any of these utilities.

Source: IPART water utility customer satisfaction survey published September 2025

2.3 Sydney Water and Hunter Water are no longer included in these surveys, but when they were a few years ago they regularly achieved results well in excess of those achieved by Central Coast despite now charging significantly lower prices.

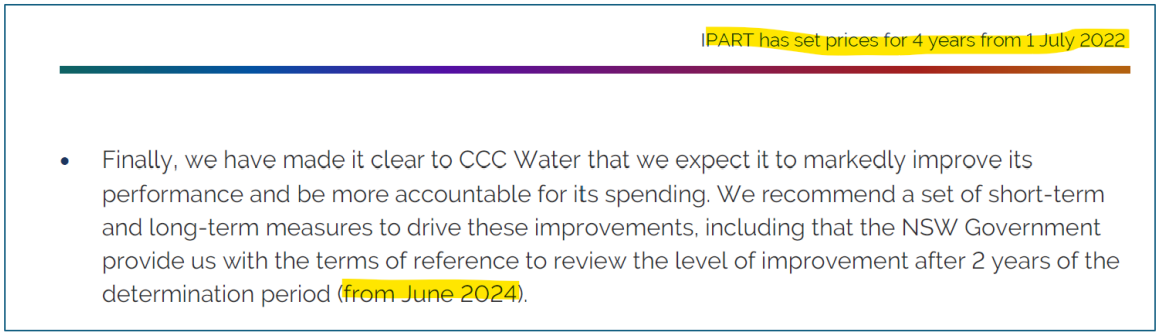
2.4 Even a majority of Central Coast Council's own performance indicators show no improvement over the four-year period of the Determination, with most showing decline. For example, the **Central Coast Council's 2024/25 Annual Performance Report** shows:

- 3,882 urgent issues reported by customers responded to within one day 90.1% compared with 90.2% in 2020/21
- Non urgent issues responded to within 5 days 3,800 (59.9%) compared with 5,262 (87.7%) in 2020/21
- Water mains breaks per KM 14.62 compared with 11.6 in 2020/21
- Number of unplanned water outages per 1000 properties 128 compared with 109 in 2020/21

- Water losses from leakage 4.8 compared with 3.8 in 2020/21
- Sewer main breaks and chokes per km 35.7 compared with 30 in 2020/21
- Sewer overflows per km of main 28 compared with 29 in 2020/21
- Number of sewer overflows reported to the environmental regulator per 100km mains – 2.3 compared with 2.5 in 2020/21
- Number of days beaches and lagoons not swimmable due to discharges 191 compared with 96 in 2021/22 (no data for 2020/21)
- Volume of bio solids reused 27,148 compared with 27,944 in 2020/21

3 BROKEN PROMISES FROM IPART'S 2022 DETERMINATION

3.1 Four years ago, in approving Central Coast Council's application for a massive price hike, IPART justified its decision as one that would lead to **"markedly improved performance":**



IPART has set prices for 4 years from 1 July 2022

- Finally, we have made it clear to CCC Water that we expect it to markedly improve its performance and be more accountable for its spending. We recommend a set of short-term and long-term measures to drive these improvements, including that the NSW Government provide us with the terms of reference to review the level of improvement after 2 years of the determination period (from June 2024).

Source: IPART's 2022 Determination Final Report

3.2 As noted in section 2 of this submission, IPART's own customer satisfaction surveys clearly show this promised improvement has not been delivered. It was naïve to approve price hikes upfront then expect a poorly managed Council to deliver its side of the bargain with no incentive to do so given the money had already been agreed.

3.3 **IPART also needs to explain why the promised review of performance after June 2024 never took place.** How vigorously did IPART pursue this with NSW Government? Or was the whole thing just about fobbing off customers that IPART would go out to bat for them on performance in return for the price hike, whilst expecting everyone to forget this promise once the massive price hike had been implemented?

3.4 Council's own Director Water and Sewer, Jamie Loader, himself promised improvements over the period of the Determination when he said at a public Council meeting in September 2023 (live feed of the meeting and commitment are available):

"We expect these metrics (performance indicators) to improve over the course of the four-year IPART Determination."

He (and IPART) now needs to explain to customers why this hasn't happened and why we should believe another 11.1% increase next year will deliver anything different?

4 A NEW APPROACH NEEDED TO INCENTIVISE BETTER MANAGEMENT, EFFICIENCY AND PRODUCTIVITY

4.1 Central Coast Council has hiked prices 58% in four years without improving performance. Council does not have a revenue problem; it has a management problem.

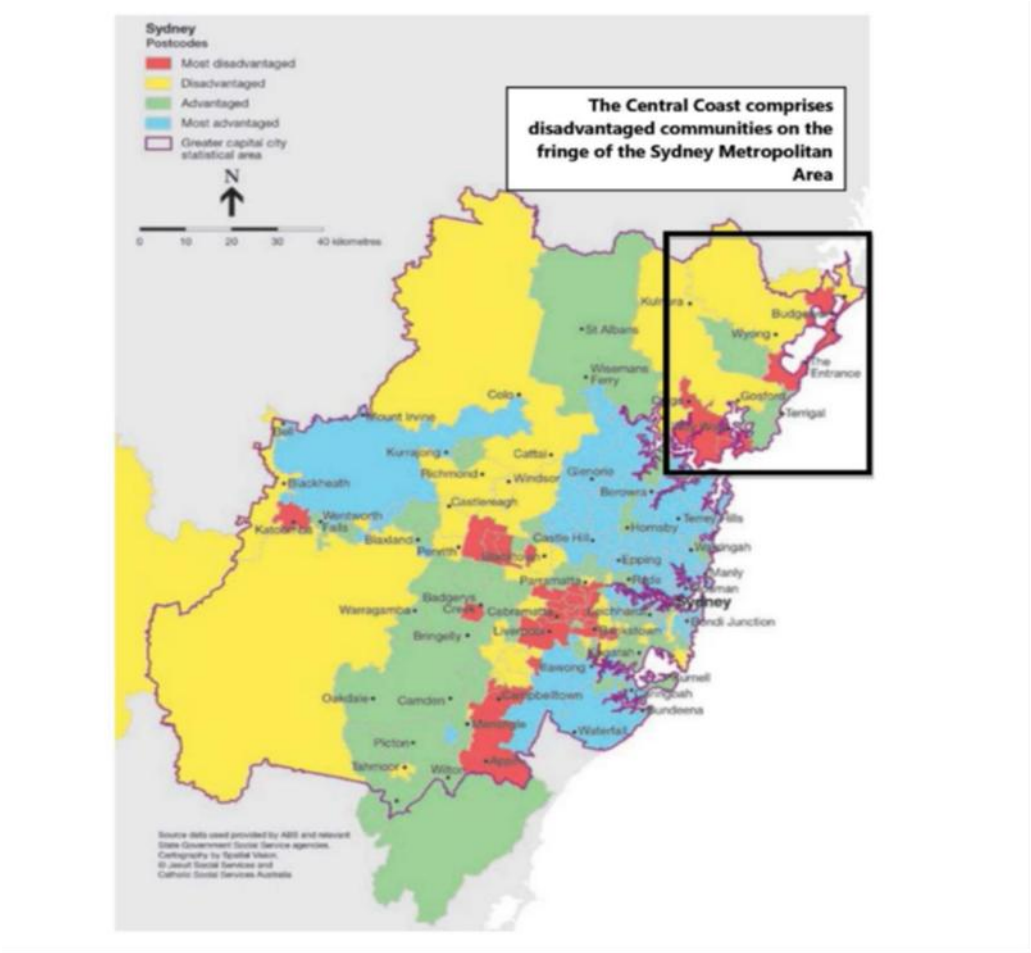
4.2 Rather than approving yet another 11.1% increase and expecting anything different, IPART should require improvements in management, efficiency and productivity. And any further price hikes above inflation should be tied to "markedly improved performance."

4.3 Improved performance must now come first before this Council can be trusted with any more price hikes.

5 AFFORDABILITY

5.1 Central Coast contains a number of deprived communities ranked "most disadvantaged" on the SEIFA disadvantage index. The Coast is a large and disparate region with both wealthy and deprived areas. The map below shows that Central Coast has some of NSW "most disadvantaged areas" (shown in red).

5.2 At IPART's recent public hearing, Council General Manager David Farmer claimed the Central Coast had no areas of extreme deprivation. The SEIFA map below would suggest that either he does not know the local government area he administers (despite earning $550,000 per year to do so), or he was deliberately seeking to mislead the Tribunal.



6 COUNCIL PUBLIC ENGAGEMENT IS BIASED AND MANIPULATIVE

6.1 Central Coast Council has spent a fortune on public engagement consultancies and exercises. Having attended several of these myself, much of the information presented is biased and misleading, and designed to steer results towards Council's own preferred outcomes. I attach at **Annex A** a detailed evidence based critique of a biased and manipulative pricing forum that I attended in May 2024.

6.2 I sent this critique to IPART at the time but received no substantive response to the concerns raised. If IPART is serious about listening to the customers of monopolies, as opposed to just taking at face value everything the monopolies tell IPART about their public consultation exercises, it needs to consider the detailed evidence about these consultations provided in this submission and in annex A.

The so called "Peoples' Panel"

6.3 Council also claims it has set up a so called "Peoples' Panel" for public consultation purposes. How was this selected? As I understand it there were two "deliberative

workshops" in 2024, and Council itself then hand-picked people from these workshops for its so called "People's Panel."

6.4 I was one of the attendees of the deliberative workshops but not selected for the "Peoples' Panel." Nor I suspect was anyone else who asked probing questions. The so called "People's Panel" appears to have been hand-picked by a public engagement consultancy hired by Council. This consultancy therefore appears to have selected the panel to achieve alignment with the agenda of its client (Central Coast Council), and to operate more like the Russian Parliament than a genuinely representative or independent body.

6.5 At the IPART Public Hearing on 20 November, Council Director Water and Sewer, Jamie Loader, was asked how this so called "People's Panel" was selected? He replied people were selected on the basis of their "industry knowledge." So, on what basis did Council assess people's "industry knowledge?" Presumably those, based on their comments at the deliberative workshops, that Council thought more sympathetic to Council's own world view! And how on earth does a selection criteria based on "industry knowledge" produce a panel representative of the customer base or public opinion?

Council Customer Surveys Conflict with IPART Customer Surveys

6.6 It was also notable that at the Public Hearing on 20 November, Council's Director Water and Sewer, Jamie Loader, criticised IPART's own customer satisfaction surveys claiming Council's own surveys produced different results. He criticised the IPART survey sample size (inaccurately stating the size) before, somewhat bizarrely, claiming that customers answering IPART questions about water and sewer were really thinking about potholes!

6.7 **The key question for IPART here though, is why do Council survey results paint a rosier picture of Council's performance than IPART's own independent surveys? If IPART is satisfied its own independent surveys are robust, then Council's (not so independent) surveys must be less robust to produce different results. This perfectly illustrates the biased and manipulative approach Council takes to public engagement as set out above. I would strongly urge IPART to take with a hefty pinch of salt any claims made by Council with respect to public engagement in its submission.**

7 COUNCIL'S NEW APPROACH TO PERFORMANCE REPORTING HAS REDUCED ACCOUNTABILITY

7.1 Council boasts it has increased the amount of performance reporting it now produces. Council does, indeed, now publish monthly performance data on the internet. Yet, Council's new approach to performance reporting has had the effect of reducing accountability for performance. How so?

7.2 Well, prior to 2024/25 Council included the most important water and sewer performance data in its Operational Plan (over 30 indicators in 2023/24). This meant it was legally obliged to report performance against these indicators quarterly to Council meetings - where Councillors could ask questions and seek explanations and solutions for poor performance. The public also got the opportunity to question the results in the Public Forum held immediately before Council meetings (and often did).

7.3 Then, after these quarterly performance reports to Council began generating criticism of Council's performance in the Public Forum, Council removed water and sewer performance reporting from the Operational Plan. **There is no longer quarterly performance reporting to Council meetings. There is only an annual performance report to Council, not quarterly reporting.**

7.4 **This means there is no opportunity for Councillors to collectively discuss performance quarter by quarter and seek explanations or solutions for poor performance. Nor is there any opportunity for the public to do likewise at the Public Forum immediately before the Council meetings.**

7.5 Instead, voluminous data is published on the internet which hardly anybody reads and never drives any collective discussion or accountability at the Council (governing body) meetings. **The whole approach is about ticking the box on outputs whilst removing real accountability for outcomes.**

7.6 In its last Determination Report, IPART stated that it expected Council to improve its accountability. If IPART is serious about that, it should recommend that Council reinstate quarterly water and sewer performance reporting to the governing body (the formal Council meetings), thereby driving more collective discussion about performance in the governing body meetings and the Public Forum that takes place immediately before.

Annex A

Email to IPART complaining about bias and manipulation in water pricing public "consultation"

Hi Scott

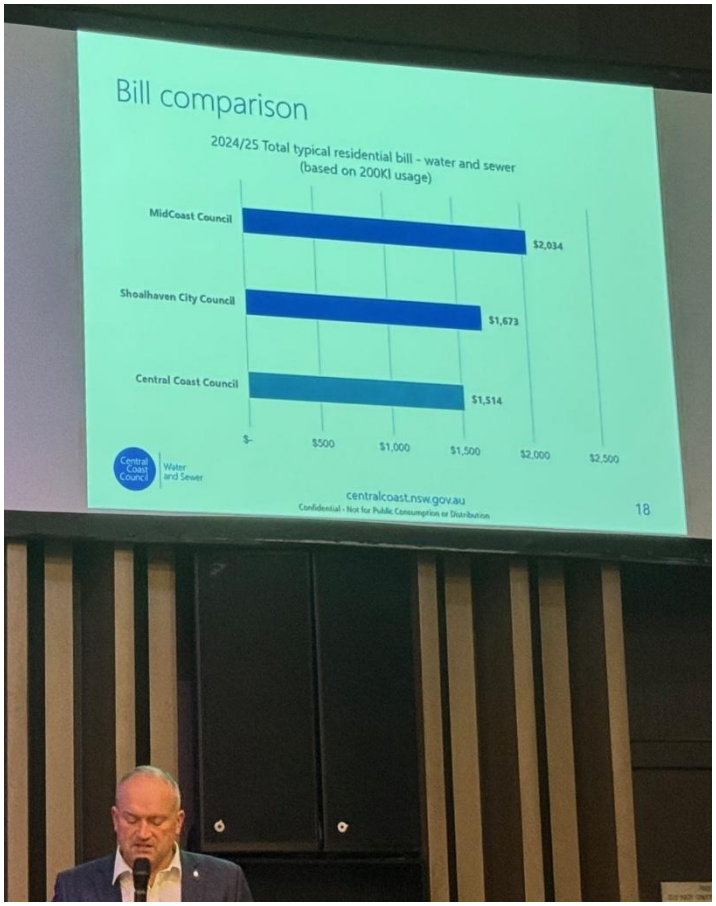
This is a formal complaint about the biased and manipulative "public consultation" on water pricing being carried out by Hall and Partners for its client Central Coast Council, including the presentation of inaccurate information to participants. I would appreciate an acknowledgment, and an indication of how this complaint will be dealt with.

COMPLAINT

I attended the "pricing forum" held in Gosford on 1st May and have also completed the on-line survey.

Many of the screenshots below are from the on-line survey, but the same questions were identically phrased (including the same inaccurate information) at the pricing forum.

1 Inappropriate use of price comparators to mislead participants into believing Central Coast is cheaper than relevant peers.



As you can see above, Director Water and Sewer, Jamie Loader, selected two much smaller Councils (with about 35,000 connections) for price comparison with Central Coast (140,000 connections).

This was a change to previous practice whereby Central Coast has always compared its prices with Sydney Water and Hunter Water.

Mr Loader claimed, "the industry" no longer viewed Sydney and Hunter as valid comparators – without any attempt to justify why not, or what he meant by "the views of the industry." I put my hand up to ask a question about this but was not allowed to speak (so much for public engagement!)

In reality, Sydney and Hunter have always been regarded as more valid comparators as they, along with Central Coast, form "the big three" – the only three water suppliers with scale.

A typical water bill on the Central Coast is currently 26% higher than Sydney, and 10% higher than Hunter.

Mr Loader appears, therefore, to have deliberately removed Sydney and Hunter as price comparators because he knows this would show Central Coast water to be expensive.

He has replaced Sydney and Hunter with two much smaller Councils to mislead the Forum that Central Coast prices are cheap compared with other suppliers. The intention here, presumably, is to make the Forum more likely to accept further price increases.

Did Mr Loader consult IPART before moving the goalposts?

Since this misleading information will have impacted how people voted at the pricing forum, these results should be regarded as tainted by bias and therefore unreliable.

2 Biased questions, including inaccurate Information, within the questions

2.1 17-22% increase

Both the survey and pricing forum stated at the outset there would be a 17-22% (plus inflation) increase regardless of the public consultation.

As an aside, it is unclear where this decision was taken as it has not been approved by a public Council meeting through which accompanying reports could be scrutinised by the community. Nor has 17-22% been approved yet by IPART?

There were no questions at the pricing forum asking participants whether we agreed with the 17-22% increase.

The only questions relating to the 17-22% increase at the forum (certainly on my table) were whether participants agreed that the "essential costs" work such as meeting compliance obligations should be undertaken.

This is a biased question because nobody is going to say they don't think Council should spend money meeting compliance obligations.

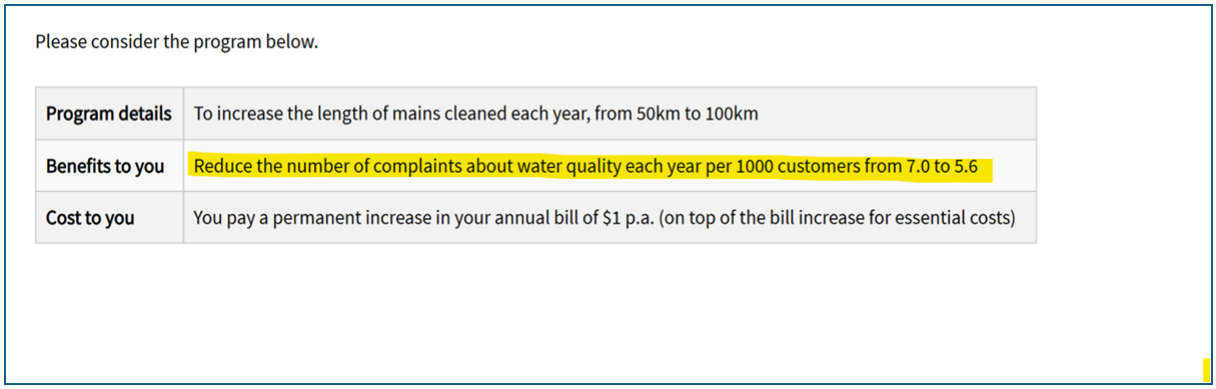
That is not the same thing as agreeing a 17-22% increase is needed to do so.

The final report should not therefore interpret support for undertaking essential compliance work as meaning there is support for a 17-22% increase.

Given that water prices have already risen 51% in three years, many people may think Council already has enough money to meet compliance obligations – especially if operating efficiently. The questions were phrased, however, in such a way as to prevent such a view from being expressed.

This is also true of the survey where the only way to express opposition to the 17-22% price hike would be, in response to the question on "essential costs," ticking the box marked "other" and adding a comment. The equivalent of an election candidate with no voting box where voters can place "1" next to his/her name, and who can only receive a vote if voters tick a box marked "other" and write in the candidate's name. No election candidates would consider that fair!

2.2 Water quality question inaccurately states current service level



Please consider the program below.

Program details	To increase the length of mains cleaned each year, from 50km to 100km
Benefits to you	Reduce the number of complaints about water quality each year per 1000 customers from 7.0 to 5.6
Cost to you	You pay a permanent increase in your annual bill of $1 p.a. (on top of the bill increase for essential costs)

The above question asks if participants are willing to pay more (on top of the 17-22% increase) for better water quality.

The benefit from this is defined as a "reduction" in complaints per 1000 customers from 7 to 5.6.

The latest Water and Sewer annual performance report, however, shows the current level of complaints was 3 per 1000 customers across the year.

Achieving a result of 5.6 per 1000 would therefore be a deterioration in current performance, not an improvement.

Would participants have voted "yes" if they had known they were voting to pay more for a worse performance, i.e., more complaints per 1000 properties than currently the case?

I took this up with the Director W&S, Mr Loader, and he replied that it is the ***target*** that would reduce. This is an invalid response for two reasons.

First, the wording of the question doesn't mention the word ***"target,"*** it simply states the benefit would be to *"reduce the number of complaints about water quality each year per 1000 customers from 7 to 5.6."*

Second, even if the question had mentioned the word "target," would participants have voted "yes" to pay more for a new target set at a worse level than they are currently receiving?

If current performance is 3 complaints per 1000 customers, why pay more to set a new target of 5.6 per 1000?

Clearly, the provision of incomplete and inaccurate information in this question will have affected the outcome. The results in relation to this question cannot therefore be regarded as reliable, and this needs to be acknowledged in the final report on the consultation.

2.3 Unplanned Interruptions question changes the established metric and also appears inaccurate

Special valves in water pipes

We can reduce the number of water supply interruptions and the number of water quality problems by installing more Smart Gate Valves (S-gate valves). S-gate valves are special valves used for controlling water flow in pipelines. The technology decreases disruption of water services for the community by eliminating the need to shut down water mains during large water main valve replacement. However, they cost more than standard valves.

Please consider the program below.

Program details	Install special valves that enable us to work on the pipes without turning off your water
Benefits to you	Reduce the chance of you experiencing an unplanned water outage during July 2026 - June 2031 from 61% to 52%
	Reduce the number of complaints about water quality each year per 1000 customers from 7.0 to 6.4
Cost to you	You pay a permanent increase in your annual bill of $1 p.a. (on top of the bill increase for essential costs)

The above question asks if participants are willing to pay more (on top of the 17-22% increase) for fewer unplanned interruptions.

The benefit from this is defined as a "reduction" in probability of an unplanned interruption from 61% to 52%.

This represents a change of metric from that previously agreed with IPART. The metric used in all previous annual and quarterly performance reports has been unplanned interruptions per 1000 properties. Now, Council has suddenly changed the metric to a probability metric, which means it is difficult to see how the benefit promised compares with previously reported performance over the past five years.

It is also difficult to reconcile the wording of the question with respect to current probability, with currently reported performance.

For example, the question claims that there is currently a 61% probability of an unplanned interruption in a five-year period.

The last quarterly report, however, stated that 519 properties experienced an interruption in December 2024.

519 interruptions in one month would mean 31,140 properties impacted in 5 years (519x12x5).

There are 140,000 properties currently connected, so 31,140 properties facing an interruption would be 22% of properties experiencing an interruption over 5 years.

That gives a current probability of 22%, NOT 61% as claimed.

Achieving a new probability of interruption of 52% is therefore a deterioration on current performance, not an improvement.

Would participants have voted "yes" if they had known they were voting to pay more for a worse performance (greater probability of an interruption) than they currently receive?

The Director W&S may, as with the previous question, claim the probability refers to the ***target*** performance not the actual performance.

This is an invalid response for two reasons.

First, the wording of the question doesn't mention the word ***"target,"*** it simply states the benefit would be to *"reduce the chance of you experiencing an unplanned water outage during July 2026 to June 2031 from 61% to 52%."*

Second, even if the question had mentioned the word "target," would participants have voted "yes" to pay more for a new target set at a worse level than they are currently receiving (i.e., higher probability of interruption than exists presently)?

If current performance gives a 22% probability of being impacted, why pay more to set a new probability target of 52%?

Clearly, the provision of incomplete and inaccurate information in this question will have affected the outcome. The results in relation to this question cannot therefore be regarded as reliable, and this needs to be acknowledged in the final report on the consultation.

2.4 Insufficient Range of Questions

The pricing forum questions were almost exclusively confined to whether or not participants were willing to pay more than a 17-22% increase for various "improvements."

This style of questioning creates an impression that price and service quality are a zero-sum game, and that there is nothing else that can be done to improve services without increasing

price, for example, management practices, process re-engineering, innovation, reforms to improve efficiency or productivity, people management – motivation and culture, etc.

The questions therefore drive an implicit assumption you can only get more by paying more - thereby creating an at least subliminal bias in the questions towards a price hike.

Confining the questions to "are you prepared to pay more" also drives the outcome in only one direction. It makes a majority for at least some price hike inevitable. True, participants could answer "no" to every single question, but people tend not to do so when confronted with the same "are you prepared to pay more" question for a number of different things. People tend not to want to respond "negatively" to every question and sometimes want to give some "yes" responses merely to indicate a relative preference for one thing over another. But these "yes" responses, even if only intended as relative preferences, add up across 50 participants to produce outcomes they may not actually want.

It would be more objective and less biased to ask a wider range of questions, for example, do participants think current prices are too high, too low or about right? Would they like to pay less? Do they think Council can improve its operational efficiency? Do they think they are getting value for money based on what they currently pay etc.

3 Removal of "affordability" from top three values from previous community consultation

The 2023 Woolcott reports (covering phase 1 and phase 2 public consultation) showed that the community identified "affordability" as its joint second most important value for water, and third most important value for sewer. See extract below from Woolcott phase 2 report.

1.3 Values and Outcomes

Overall, participants agreed with the summary of the values and outcomes that were developed collaboratively in Phase 1. In terms of prioritisation, there was a belief that they were interlinked and so all are important to some degree.

The order of importance, and indexed weighting given in the forums, for **water supply** was:

- Good water quality – 21%
- Reliable service – 19%
- Affordable service – 19%
- Effective future planning – 15%
- Environmental focus – 14%
- Transparency and education – 12%

In general, there were similar findings in the in-depth interviews and youth group. The Aboriginal and Torres Strait Islander participants placed a slightly greater emphasis on the environmental focus value. They, and the large customers, wanted more information or outcomes within this value – more about what Council is going to do to ensure this value is met. The Youth Group were slightly more concerned with affordability due to the current cost of living increases. Large customers valued transparency and education, particularly a more direct line of communication to Council.

The order of importance, and indexed weighting given at the forums, for **sewerage service** was very slightly different – reliable service and environmental focus increased in importance:

- Reliable service – 20%
- Quality treatment – 20%
- Affordable service – 17%
- Environmental focus – 15%
- Effective future planning – 15%
- Transparency and education – 12%

The results above probably understate community support for “affordability” as a value because Woolcott phase 3 tested the above with further surveys and noted that, whilst the values as a group were supported, there was feedback within the surveys suggesting affordability should be even higher.

In 2024, a further engagement exercise by a different consultant also included affordability in the top three values:

	Group 1	Group 2	Group 3	Group 4	Group 5	Median Score	Priority Rank
Quality (Good Quality Water & Treatment)	2	1	1	2	1	1	1
Reliable Service	4	4	3	2	2	3 (3 mean)	2
Affordability	5	3	2	6	3	3 (3.8 mean)	3
Effective Planning	1	5	5	1	5	5	5
Envrionmental Focus	3	2	6	4	4	4	4
Transparency	6	6	4	5	6	6	6

Despite these results, the Pricing Forum removed "affordability" from the top three values:

This appears to be a contrived result. Quality is split into water quality and sewer service quality (inconsistent with the approach for reliability which is combined across both water and sewer), thereby pushing affordability out of the top three. The "top three" as shown above are now being presented as "the values" – i.e., the only ones being headlined which means affordability was not included in the slide.

Given that Woolcott found affordability joint second for water with 19% (just 2% short of top position), and third for sewer (just 3% behind the top two), it is difficult to see how it could have been objectively excluded from the top three at the pricing forum.

It is obviously harder to convince a Pricing Forum to agree to a price hike if the top three values, based on community consultation, include affordability. I suspect affordability has therefore been deliberately removed for that reason.

This is an example of the subtle biases that have run right through all the engagement and consultation exercises in recent years. All these exercises have been designed to manipulate

responses to achieve a predetermined outcome supporting an IPART application for yet another big price hike.

4 Selection of Forum Participants

Council advertised for volunteers for the pricing forum on its website and social media pages.

I applied and was accepted by the consultant running the recruitment (who obviously did not know me).

Later, I was then removed from the forum on the basis all places had been taken. I pointed out this couldn't be right because just hours before I received an email informing me, I had been accepted, Council had placed another advertisement saying slots were still available.

I was then told I didn't meet the demographic requirement. I pointed out this also couldn't be right as I obviously had met the demographic when previously accepted.

I was eventually re-instated, but only after Council's media unit received inquiries from the media about why participants were being de-selected.

The way this was handled, however, leaves me with little confidence in how these "representative" panels are being selected. How does anybody know if they are being "stacked" by persons known to Council Management as sympathetic – possibly even friends or associates? I am not alleging that is the case as I have no evidence, but I am saying I have no confidence in the process given what happened to me after I volunteered and given all the other bias practices mentioned above.

5 Independence of Public Engagement Consultants

There is a systemic risk of bias in these public engagement exercises due to the fact the consultants who run them are appointed and remunerated by a Council Senior Management with a vested interest in the outcome.

Central Coast Council clearly wants to increase water prices. It is in the interests of Council Management (for a number of reasons) to receive yet more rates income from the community. This is not only because of salaries, perks, working conditions, new toys in the Civic Centre, or swanky new offices, but also because it makes their lives easier if they can deliver the service at low levels of efficiency.

It is also in the interest of the public engagement consultants to deliver an outcome favourable to their client.

After I was re-instated to the pricing forum, one of the partners in Hall and Partners telephoned me to discuss my re-instatement. During the conversation, I asked if there would be any questions about efficiency, and she replied to words to the effect: "no, because our clients wouldn't approve of that."

Public engagement consultants don't want to upset a client who can deliver future business for them either directly or through industry networks.

This is recognised in the world of external audit where audit firms report to shareholders, not management. Indeed, the same applies in State Government where the Audit Office NSW reports to the Public Accounts Committee of Parliament, not the Executive Government Agencies.

I would therefore propose that IPART may wish to consider a change in future whereby these public engagement firms report direct to IPART, in accordance with laid down standards, rather than to Councils with an obvious interest in the public engagement conclusions, and how they are reported.

Regards

[redacted]