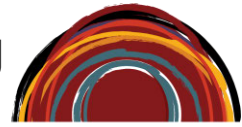


## Submission to the Productivity Commission, National Water Reform 2026

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## About Us

Aboriginal Housing Northern Territory (AHNT) is the peak body for the Aboriginal Community Controlled Housing Sector (ACCHS) in the Northern Territory (NT).

AHNT has 18 Aboriginal Community Controlled Organisation (ACCO) members that provide housing related services including: (1) housing (as landlord or housing authority); (2) housing design and construction; (3) housing management (tenancy and property management); (4) housing repairs and maintenance; (5) housing, municipal and essential services; and (6) tenancy support. In addition, AHNT has 8 associates including the 4 Land Councils and 4 ACCOs that are currently developing their capacity to deliver housing related services.

AHNT sits on the [Joint Steering Committee for Remote Housing NT](#) and the National [Housing Policy Partnership](#).

## Introduction

AHNT welcomes the opportunity to respond to the Productivity Commission's National Water Reform Inquiry.

We note that the scope of the Inquiry is to 'examine all jurisdictions' **water policy and regulatory settings** required to support the long-term sustainability of Australia's water services industry, having regard to water affordability, productivity and other key priorities (**housing supply**, net zero transition, **National Closing the Gap targets** and the sustainable development of new industries, including data centres)" (emphasis added).

Further, Key Priorities previously identified for the NT include (non-exhaustively) the following:

- Progress its planned safe drinking water legislation and continue to **improve water quality in remote communities**
- **Strengthen the voice of First Nations peoples** in water management and enhance access to water for Aboriginal peoples within its Strategic Aboriginal Water Reserves. (emphasis added)

Our submission is concerned with Water Supply and Sewage Services (WSSS) in NT Remote Aboriginal Communities and Homelands and the linkage to Remote Housing and National Closing the Gap (CTG) targets.

WSSS are delivered in Remote Communities and Homelands by Government Owned Corporation, Power and Water Corporation (PWC) subsidiary Indigenous Essential Services (IES).

Remote WSSS service delivery is unregulated because it is outside of WSSS licence areas. This lack of WSSS licencing, regulation, reporting and protections directly contributes to a lack of progress toward CTG Target 9b.

## Background

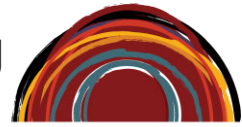
### Closing the Gap (CTG)

The [Closing the Gap: NT Implementation Plan 2](#) (CTG IP 2) reproduces the following description of Outcome 9 -

*Aboriginal and Torres Strait Islander people secure appropriate, affordable housing that is aligned with their priorities and need.*

### CTG Targets 9a and 9b

As essential services, WSSS come within the scope of Target 9b. CTG Targets 9a and 9b are reproduced in the following table (overleaf).



Closing the Gap – Target 9a
By 2031, increase the proportion of Aboriginal and Torres Strait Islander people living in appropriately sized (not overcrowded) housing to 88%.
Closing the Gap – Target 9b
By 2031, all Aboriginal and Torres Strait Islander households: <ul style="list-style-type: none"> <li>i. within discrete Aboriginal or Torres Strait Islander communities receive essential services that meet or exceed the relevant jurisdictional standard</li> <li>ii. in or near to a town receive essential services that meet or exceed the same standard as applies generally within the town (including if the household might be classified for other purposes as a part of a discrete settlement such as a ‘town camp’ or ‘town-based reserve’).</li> </ul>

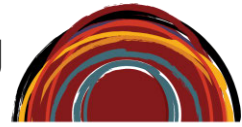
### Target 9b - Progress

According to the [Closing the Gap: Dashboard](#), *Target 9B cannot be reported against as there is no data source currently available which includes all required data elements.*

### Target 9b - Data Specification

Data specification as outlined in the [Closing the Gap: Dashboard](#) informs CTG IP2. CTG 9b lacks an agreed: (1) data source, (2) data provider; and (3) baseline data.

Detail	Description
Indicator	The proportion of Aboriginal households receiving essential services that meet or exceed standards
Measure 1	The proportion of Aboriginal households within discrete Indigenous communities that meet or exceed the relevant jurisdictional standard.
Measure 2	The proportion of Aboriginal households in or near to a town that receive essential services that meet or exceed the same standard as applies generally within the town.
Established	Added August 2022.
Type	Target
Interpretation	A high or increasing proportion is desirable.
Data Source	To be confirmed.
Data Provider	To be confirmed.
Baseline Year	To be confirmed.
Latest	No data reported.
Target Year	2031
Disaggregation	State and Territory.
Parameters	A <u>Discrete Community</u> is a geographic location, bounded by physical or legal boundaries, which is inhabited or intended to be inhabited predominantly by Aboriginal peoples, with housing or infrastructure that is managed on a community basis. Discrete communities have populations of (but not limited to) 50 or more Aboriginal people.
	<u>Essential Services</u> include power, water, wastewater and solid waste management only.
	Relevant <u>Jurisdictional Standard</u> : Applicable standards may differ between places within a jurisdiction according to population size or other relevant criteria but not on criteria linked to the settlement’s status as a discrete Aboriginal community.



## Target 9b Actions

CTG – IP2 outlines the following actions that were designed to achieve CTG Target 9b in the NT context in the absence of an agreed: (1) data source, (2) data provider; and (3) baseline data.

#	Action	Lead
1	<a href="#">Joint Steering Committee for Remote Housing NT</a> , NT Government, and the Power and Water Corporation to work together to develop a plan to improve Indigenous Essential Services' accountability and transparency, including improved Aboriginal participation in decision-making.	<a href="#">DHLGCD</a> <sup>1</sup>
2	Complete infrastructure assessments and develop a prioritised list of infrastructure requirements and a capital infrastructure action plan to support Target 9b.	DHLGCD
3	Through the Territory Water Plan, establish a framework for community drinking water management plans.	<a href="#">DLPE</a> <sup>2</sup>
4	Improve transparency by presenting and sharing information on drinking water safety management and plans by service providers for Aboriginal stakeholders.	DHLGCD
5	Develop and make publicly available an annual Plain English summary report on infrastructure, including water security status in and for remote communities.	DHLGCD
6	Develop a meaningful customer charter/contract for essential services delivery with consumers in and for remote Aboriginal communities.	DHLGCD

## Target 9b Geographic Scope

CTG – IP2 outlines that *Target 9b actions will be implemented in communities under the NT Government's Indigenous Essential Services program in the first instance. This program services 72 remote Aboriginal communities, 79 homelands, and approximately 39,000 customers. As the actions are implemented, parties will also look for opportunities to apply these actions more broadly to additional homelands that fall within the 9b definition.*

## Water Supply Licence Areas

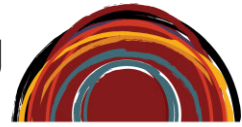
In the NT, WSSS is delivered by PWC and its subsidiary IES. The respective roles of PWC and IES are defined by location – (a) PWC operates inside declared WSSS licence areas; and (b) IES operates in remote Aboriginal communities outside declared WSSS licence areas.

The [Water Supply and Sewage Services Act, 2000](#) outlines that the Minister may declare a WSSS licence area:

Declaration of Licence Areas	
8	The Minister may, by notice in the Gazette, declare an area to be a water supply licence area.
9	The Minister may, by notice in the Gazette, declare an area to be a sewage services licence area.

<sup>1</sup> Department of Housing, Local Government and Community Development

<sup>2</sup> Department of Lands, Planning and Environment



## Geographic Regulatory Disparity

In the NT, disparity in WSSS regulation is determined by geography as outlined below:

Regulated Water Supply Licence Areas – Serviced by PWC	
The water supply licence area(s) covered by the licence are those geographical areas declared as water supply licence areas by the Minister pursuant to section 8 of the Water Supply and Sewerage Services Act <sup>3</sup> .	
Major Urban	Darwin, Katherine, Tennant Creek, and Alice Springs
Minor Urban	Batchelor, Adelaide River, Pine Creek, Borroloola, Timber Creek, Daly Waters, Elliott, Newcastle Waters, Kings Canyon, Ti-Tree, Larrimah, and Mataranka.

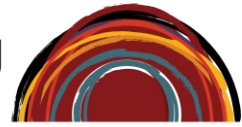
Unregulated Remote Water Supply – Serviced by IES	
IES delivers essential services in 72 communities and 79 homelands (WSSS only delivered in 15 homelands).	
Communities	72 Remote Communities ( <a href="#">Appendix 1</a> )
Homelands	15 Homelands ( <a href="#">Appendix 2</a> )

## No Minimum Standards for Remote Water Supply

Unlike urban areas serviced by PWC, there are no formal minimum standards for WSSS in remote Aboriginal communities and homelands.

Document	Section		PWC	IES
WSSS Act	45	The Minister may from time to time specify the minimum standards that a licensee must meet in providing WSSS to customers. Without limiting subsection (1), the minimum standards may include: (a) water quality standards; (b) standards of supply; and (c) reliability of service.	Yes	No
WSSS Licence	18	In accordance with sections 49 and 50 of the WSSS Act the licensee must monitor and report to the Utilities Commission on its compliance with the minimum standards in providing water supply services to customers which may include water quality, standards of supply and reliability of service.	Yes	No

<sup>3</sup> [Water WSSS Licence \(Urban\) – Schedule 2](#)



## No Regulatory Reporting for Remote Water Supply

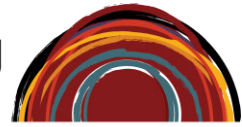
Unlike urban areas serviced by PWC, there is no regulatory reporting for WSSS in remote Aboriginal communities and homelands.

Document	Section		PWC	IES
WSSS Act	50.1	A licensee must report to the Utilities Commission on his or her compliance with the terms and conditions of his or her licence and the minimum standards.	Yes	No
	50.2	A licensee must report to the Chief Health Officer the results of his or her compliance with the minimum water quality monitoring program.	Yes	No
WSSS Licence	25.1	The licensee must, from time to time, provide the Utilities Commission, in a manner and form to be determined by the Utilities Commission, such information necessary to the performance of its functions under any applicable laws that the Utilities Commission may request.	Yes	No
	25.2	The licensee must, from time to time, provide the Chief Health Officer, in a manner and form to be determined by the Chief Health Officer, such information necessary to the performance of its functions under any applicable laws that the Chief Health Officer may request.	Yes	No

## No Customer Contract for Remote Water Supply

Selected details from the [PWC Customer Contract](#) are reproduced below. The PWC Customer Contract does not apply to Remote WSSS by IES.

Customer Contract		PWC	IES
Overview	A customer contract is a legal requirement under the WSSS Act. The contract is legally binding on both PWC, as the licensee, and the customer.	Yes	No
Coverage	Under the WSSS Act, this contract applies in NT urban centres.	Yes	No
Summary	The <a href="#">Customer Charter</a> summarises key points.	Yes	No
Licences	PWC holds operating licences to supply WSSS under the WSSS Act.	Yes	No
Standards	WSSS Service Standards are reproduced in <a href="#">Appendix 3</a> .	Yes	No



## No Customer Charter for Remote Water Supply

Selected details from the [PWC Customer Charter](#) are reproduced below. The PWC Customer Charter does not apply to Remote WSSS by IES. Notably the Customer Charter only partially applies in Minor Urban areas.

Customer Charter	Urban		
	Major	Minor	IES
Reconnect electricity within 1 business day of receiving notice from retailer.	Yes	No	No
Provide at least 15m head water pressure at mains under normal supply conditions and 20 litres/minute to homes with a standard residential connection.	Yes	No	No
Attend sewer spills inside home within 1 hour.	Yes	No	No
Attend sewer spills from our network within 1 hour of notice.	Yes	No	No
Restore 95% of unplanned water outages within 5 hours.	Yes	Yes	No
Give 5 business days' written notice before restricting or disconnecting water supply or electricity supply.	Yes	Yes	No
Disconnect electricity or restrict water without notice if there is a safety risk, obstruction or illegal use.	Yes	Yes	No
Inspect and, if needed, replace faulty water meters within 28 days, and no later than 90 days.	Yes	Yes	No
Inspect and, if found to be non-compliant, make a water meter assembly compliant within 90 days.	Yes	Yes	No
Employees and contractors carry official identification, which they will present to when entering property.	Yes	Yes	No

## Summary

Remote WSSS service delivery is unregulated in remote Aboriginal communities and homelands because it is outside of WSSS licence areas. This lack of WSSS licencing, regulation, regulatory reporting and consumer protections directly contributes to a lack of progress toward CTG Target 9b.

CTG Target 9b requires data specification to enable the measurement of baseline data and subsequent progress toward achieving Target 9b.

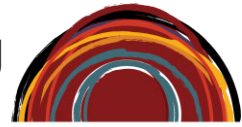
The following table provides a summary of findings derived from previous sections.

Findings	
1	No Minimum Service Standards
2	No Regulatory Reporting
3	Informal Water Quality Reporting
4	No Customer Contract
5	No Customer Charter
6	No Data Source or Data Provider for <a href="#">Closing the Gap Target 9b</a> .
7	No Data = No Reported Progress Toward Closing the Gap Target 9b



**Recommendations**

1. That Water Supply Licence Areas be extended to include Remote Aboriginal Communities and Homelands serviced by Indigenous Essential Services.
2. That regulatory reporting be extended to include Remote Aboriginal Communities and Homelands serviced by Indigenous Essential Services.
3. That formal minimum standards be extended to include Remote Aboriginal Communities and Homelands serviced by Indigenous Essential Services.
4. That the customer contract be extended to include Remote Aboriginal Communities and Homelands serviced by Indigenous Essential Services.
5. That the customer charter be extended to include Remote Aboriginal Communities and Homelands serviced by Indigenous Essential Services.



## Epilogue

AHNT is party to both the [Joint Steering Committee for Remote Housing NT \(JSC\)](#) and the National [Housing Policy Partnership \(HPP\)](#). CTG 9b is in scope for both the JSC and the HPP.

The JSC Remote Essential Services Working Group (RESWG) was established for the purpose of progressing toward CTG.

The Remote Essential Services Working Group (RESWG) Terms of Reference is substantially derived from the [Closing the Gap: NT Implementation Plan 2](#).

The emphasis of the RESWG includes - Water Supply and Sewage Services; and Electrical Supply, Distribution and Generation by Indigenous Essential Services across 72 Remote Communities and 79 Homelands.

Observations about unregulated WSSS that are outlined in this paper can largely be repeated for unregulated Electrical Supply, Distribution and Generation by Indigenous Essential Services for the same region.

The [Closing the Gap: NT Implementation Plan 2](#) includes the following limitations:

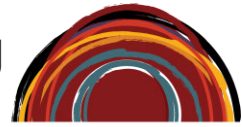
1	The Closing the Gap: NT Implementation Plan lacks Target 9b data specification.
2	The Closing the Gap: NT Implementation Plan overlooks grid connected Town Camps serviced by Jacana.
3	The Closing the Gap: NT Implementation Plan overlooks solid waste management.

**The extension of licencing, regulation, public regulatory reporting and consumer protections is viewed as a pathway to addressing these limitations.**

AHNT has previously proposed the following standards for the consideration of the RESWG to serve both as reporting indicators and benchmarks for progress towards CTB Target 9b.

1	% of households connected to electricity networks that are (a) regulated by the Utilities Commission of the Northern Territory (UCNT); and (b) compliant with UCNT requirements.
2	% of households with an electricity meter that can report disconnection.
3	% of households connected to water networks that are (a) regulated by the UCNT; and (b) compliant with UCNT requirements.
4	% of households with an individual water meter.
5	% of households connected to wastewater networks that are (a) regulated by the UCNT; and (b) compliant with UCNT requirements.
6	% of households which receive weekly kerbside rubbish collection provided by Local Government.

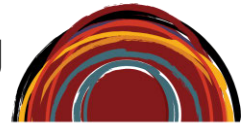
# Aboriginal Housing Northern Territory



## Appendix 1 – Remote Community Housing Serviced by IES (August 2025)

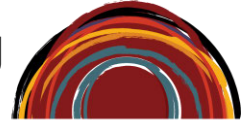
FFA	Bushtel	NTG Region	Land Council	Community	Housing	Occupied	Tenants
1	279	Arafura	NLC	Acacia Larrakia	14		
2	202	Barkly	CLC	Ali Curung	78	67	305
3	203	Barkly	CLC	Alpurrurulam	81	79	343
4	622	Big Rivers	NLC	Amanbidji	19	15	64
5	9	Central	CLC	Amoonguna	62	34	105
6	10	Barkly	CLC	Ampilatwatja	49	43	259
7	451	Arnhem	ALC	Angurugu	159	132	537
8	36	Central	CLC	Finke (Apatula)	52	44	139
9	20	Central	CLC	Areyonga	32	30	150
10	42	Central	CLC	Atitjere	30	30	140
11	580	Big Rivers	NLC	Barunga	77	73	278
12	294	Arafura	NLC	Belyuen	48	45	129
13	581	Big Rivers	NLC	Beswick	94	89	392
14	582	Big Rivers	NLC	Binjari	44	39	183
15	586	Big Rivers	NLC	Bulla	25	18	52
16	587	Big Rivers	NLC	Bulman	30	23	119
17	219	Barkly	CLC	Canteen Creek	30	27	150
18	591	Big Rivers	CLC	Daguragu	45	38	194
19	33	Central	CLC	Engawala	23	19	96
20	227	Barkly	CLC	Epenarra	33	29	120
21	492	Arnhem	NLC	Galiwinku	285	269	1605
22	500	Arnhem	NLC	Gapuwiyak	141	131	725
23	329	Arafura	NLC	Gunbalanya	205	183	778
24	514	Arnhem	NLC	Gunyangara	30	26	123
25	41	Central	CLC	Haasts Bluff	22	14	62
26	43	Central	CLC	Hermannsburg	133	116	479
27	250	Barkly	CLC	Imangara	18	17	80
28	51	Central	CLC	Imanpa	29	19	74
29	593	Big Rivers	NLC	Jilkminggan	40	36	195
30	603	Big Rivers	CLC	Kalkarindji	67	62	284
31	66	Central	CLC	Kaltukatjara	50	45	186
32	72	Central	CLC	Kintore	70	62	295
33	608	Big Rivers	NLC	Kybrook Farm	13	13	81
34	609	Big Rivers	CLC	Lajamanu	104	94	545
35	86	Central	CLC	Laramba	40	37	170
36	362	Arafura	NLC	Maningrida	329	306	1587
37	595	Big Rivers	NLC	Manyallaluk	19	18	78
38	374	Arafura	TLC	Milikapiti	112	105	342

# Aboriginal Housing Northern Territory



FFA	Bushtel	NTG Region	Land Council	Community	Housing	Occupied	Tenants
39	531	Arnhem	NLC	Milingimbi	115	107	730
40	532	Arnhem	ALC	Milyakburra	29	27	103
41	375	Arafura	NLC	Minjilang	44	37	160
42	624	Big Rivers	NLC	Minyerri	60	55	381
43	112	Central	CLC	Mount Liebig	29	26	141
45	397	Arafura	NLC	Nauiyu	69	60	243
46	404	Arafura	NLC	Nganmarriyanga	50	41	216
47	633	Big Rivers	NLC	Ngukurr	165	151	724
48	127	Central	CLC	Nturiya	23	16	51
49	549	Big Rivers	NLC	Numbulwar	122	117	454
50	128	Central	CLC	Nyirripi	43	35	121
51	131	Central	CLC	Papunya	51	47	235
52	410	Arafura	NLC	Peppimenarti	31	19	92
53	639	Big Rivers	NLC	Pigeonhole	23	20	99
54	411	Arafura	TLC	Pirlangimpi	117	115	320
55	138	Central	CLC	Pmara Jutunta	36	33	122
56	550	Arnhem	NLC	Ramingining	142	127	800
57	641	Big Rivers	NLC	Rittarangu	16	15	93
58	258	Big Rivers	NLC	Robinson River	39	32	167
59	145	Central	CLC	Santa Teresa	108	97	390
60	264	Barkly	CLC	Tara	21	15	50
61	148	Central	CLC	Titjikala	44	41	146
62	555	Arnhem	ALC	Umbakumba	74	63	266
63	426	Arafura	NLC	Wadeye	306	253	1296
64	174	Central	CLC	Wallace Rockhole	31		
65	429	Arafura	NLC	Warruwi	68	58	254
66	654	Big Rivers	NLC	Weemol	16	15	92
67	186	Central	CLC	Willowra	46	32	127
68	187	Central	CLC	Wilora	29	23	70
69	400	Arafura	TLC	Wurrumiyanga	306	277	1045
70	658	Big Rivers	NLC	Yarralin	52	48	210
71	576	Arnhem	NLC	Yirrkala	127	117	572
72	197	Central	CLC	Yuelamu	40	21	94
73	73	Central	CLC	Yuendumu	144	120	471

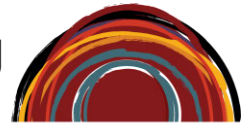
# Aboriginal Housing Northern Territory



## Appendix 2 – Homelands Serviced by IES for WSSS (2025/26)

Bushtel	NTG Region	Land Council	Community	HMES Houses <sup>4</sup>
24	Central	CLC	Utily	5
46	Central	CLC	Dons Bore	1
52	Central	CLC	Importna	1
67	Central	CLC	Kaporilya	2
94	Central	CLC	Lyilyalanama	1
336	Top End	NLC	Injilatparri	n/a
435	Top End	NLC	Wudapuli	9
465	East Arnhem	NLC	Bodia	11
664	East Arnhem	NLC	Dhudupu	1
765	Central	CLC	Ngankiritja	3
772	Central	CLC	Ulpunda	2
838	East Arnhem	NLC	Wulkabimirri	5
1006	Top End	TLC	4 Mile Camp	5
1026	Top End	NLC	Nama	7
24900	Central	CLC	Ngunga	1

<sup>4</sup> HMES = Homelands Housing, Municipal and Essential Services



## Schedule 2: Our service standards

### Water and sewerage

Power and Water is committed to providing high-quality water and sewerage services in line with minimum standards. These service standards apply to customers in major urban centres, including:

- Darwin (including Palmerston)
- Katherine
- Tennant Creek
- Alice Springs

Where services are available, our minimum service standards include (but are not limited to):

### Water services

- Timely response to reported faults or interruptions.
- Minimum water pressure and flow as outlined below.
- Resolution of water quality complaints within reasonable timeframes.

### Sewerage services

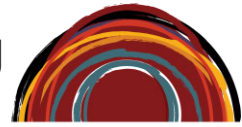
- Prompt response to sewer spills and blockages.
- Attendance within one hour when notified by a plumber or customer of a sewage spill from Power and Water infrastructure in major urban centres.
- Restoration of sewerage services within a timeframe appropriate to the scale of the fault.

Further details, including timeframes for specific response types, are available on our website or by contacting our Customer Service Centre.

Performance indicator	Minimum standard
Supply restriction	Provide 5 business days written warning when restricting due to failure to pay accounts.
Queries	Respond within 5 business days of receipt of the query.
Meter inspection and replacement of faulty meter	Inspect and, if needed, replace the meter within 28 days of inspection and no later than 90 days from when we first become aware of a possible fault (subject to access).
Non-compliant water assembly (on our side)	Inspect and, if needed, make water assembly compliant within 90 days.

### Meter tests

Performance indicator	Minimum standard
On-site volumetric comparison test	Test the meter within 10 business days of receiving the request.
NATA accredited test	Remove and replace the disputed meter within 10 business days of receiving payment of the fee.



Water	
Performance indicator	Minimum standard
Water Quality	Monitor the quality of drinking water as agreed with NT Health and report the results to the Chief Health Officer
Water flow and pressure*	Minimum flow rate of 20 litres per minute (DN20 services) and minimum water pressure at the mains tap of 15 meters head
Planned interruption	Provide 2 business days' notice of any planned interruptions.
Restore water service after unplanned interruption*	95% within 5 hours

Water service reliability	
Performance indicator	Minimum standard
Unplanned interruptions (average duration): Darwin	2 hours
Unplanned interruptions (average duration): Alice Springs	2 hours
Planned interruptions (average duration): Darwin	3.1 hours
Planned interruptions (average duration): Alice Springs	3.1 hours

Sewerage	
Performance indicator	Minimum standard
Sewer spill in residence: Notice from a plumber that the fault is due to Power and Water's sewer*	Attend within one hour
Sewer spill in residence: Notice from a plumber that the fault is due to Power and Water's sewer*	Attend within one hour
Restore sewerage after unplanned interruptions*	97.5% within 5 hours
Sewerage service system reliability (average direction of unplanned interruption): Darwin	3 hours
Sewerage service system reliability (average direction of unplanned interruption): Alice Springs	3 hours