WSUD MAINTENANCE
COMPLIANCE FRAMEWORK

CONFLICT OF INTEREST

POLICY DOCUMENT

VERSION 1

1st April 2026

wsudcompliance.com.au

Introduction

The WSUD Maintenance Compliance Framework (the Framework) and the National WSUD Compliance Network (the Network) are collaborative initiatives designed to advance industry-wide best practice in water sensitive urban design (WSUD). Ocean Protect is establishing this initiative to help develop a consistent, transparent, and nationally applicable approach to WSUD asset maintenance compliance – an area currently marked by uncertainty across jurisdictions, lack of resourcing, non-compliance, and in many cases, no regulatory activity occurring at all. This initiative aligns with Ocean Protect's mission to stop pollution entering waterways and complements other Ocean Protect efforts, such as the joint Stormwater NSW and Ocean Protect ***Zero Litter to Ocean*** policy paper.

In-principle supporters advocate for the project recognising that industry-led collaboration is essential to provide clarity, consistency, and improved environmental outcomes. For example, Stormwater NSW, believes that the Framework provides an approach to help with consistent and effective maintenance of WSUD assets. In addition, it provides market certainty and helping the industry build the capacity needed to meet environmental, water security, and climate challenges. For more information about Stormwater NSW's support, refer to **their letter of support** or get in contact with them.

Conflicts of interest may arise during this project due to the diverse experience, roles, and affiliations of participants, including Ocean Protect and Daniel Rider (the Project Lead). This policy provides clear principles and procedures to guide the recognition, disclosure, and management of conflicts, and outlines procedures for reporting, review, and mitigation.

Specifically, this policy aims to:

1. **Identify and disclose** actual, potential, or perceived conflicts of interest.
2. **Manage conflicts transparently**, ensuring that decisions prioritise public, environmental, and industry-wide benefit over individual or commercial gain.
3. **Provide accountability** through public declarations, meeting records, independent review, and a Conflict of Interest Register.
4. **Support fair and inclusive participation**, ensuring all feedback is considered regardless of the participant's organisation type or commercial interests.
5. **Maintain integrity of the Framework and Network**, allowing experienced participants to contribute while managing any potential bias or influence.

This policy applies to Ocean Protect, the Project Lead, all in-principle supporters, and all individuals and organisations (the Participants) involved in the Network and the development of the Framework. Participants are expected to act transparently, avoid commercial promotion in network activities, and support decision-making that reflects the best interests of the broader community and environment.

This policy begins by outlining its purpose and defining the various types of conflicts and how they can be managed. It then describes the existing conflicts and concludes with controls and strategies used to manage them.

1. Purpose

1.1. The purpose of this Conflict of Interest Policy is to identify, disclose, and appropriately manage any actual, potential, or perceived conflicts of interest associated with the development of the Framework and participation in the Network.

1.2. The intent is to ensure a transparent, credible, and equitable process that protects the integrity and reputation of the Framework, and all Participants. Further, this policy will prioritise public and environmental benefit over individual or commercial gain.

2. Scope

2.1. This policy applies to:

a) IES Stormwater Pty Ltd (commonly known as Ocean Protect) as the organisation leading and funding this initiative.
b) **Daniel Rider**, the appointed Project Lead (the Project Lead).
c) All in-principle supporters of the Framework as defined and identified at **www.wsudcompliance.com.au/support**.
d) All Participants involved in contributing to, reviewing, or promoting the Framework.
e) All Participants in the Network, including those involved in meetings, consultations, and public commentary.

2.2. The intent is to ensure a transparent, credible, and equitable process that protects the integrity and reputation of the Framework, and all Participants. Further, this policy will prioritise public and environmental benefit over individual or commercial gain.

3. Definitions

3.1. **Conflict of Interest:** Where a personal interest (including those of family, friends, or affiliated organisations) conflict, or may appear to conflict, with a Participants' responsibility to act ethically and in the best interests of this initiative. Conflicts may be actual, potential, or perceived, and can be pecuniary (financial) or non-pecuniary (non-financial).

3.2. **Actual Conflict of Interest:** A Participant **IS** influenced by a conflicting interest. Example: A Participant provides advice on assets to include or exclude in the Framework while employed by a company that supplies or competes with those assets, thereby creating a situation where their responsibility and professional judgement may be compromised by financial benefit.

3.3. **Potential Conflict of Interest:** A Participant **COULD BE** influenced by a conflicting interest in the future. Example: A Participant intends to provide consultancy services to projects implementing Framework recommendations, which may create a future financial or professional benefit.

3.4. **Perceived Conflict of Interest:** A Participant **COULD APPEAR** to be influenced by a conflict of interest, even if they are not. Example: A council staff member has a known professional relationship with a consultant or contractor contributing to the Framework, which could be seen as influencing their judgement.

3.5. **Pecuniary:** A situation where a Participant (or a relative or close associate) has a reasonable likelihood of financial gain or loss as a result of:

a) Owning property;
b) Holding shares;
c) Exerting influence; or
d) Holding a position in a company bidding for work or receiving gifts or benefits.

3.6. **Non-pecuniary:** A situation where there is no direct financial component, but a Participant's judgement or decisions could be influenced by:

a) Self-interest;
b) Personal or family relationships; or
c) Other affiliations, including professional relationships, friendships, animosity, or other personal involvement that could create bias.

3.7. **Simple disclosure:** A conflict control in which a participant fully discloses the actual, potential, or perceived conflict of interest to the relevant parties (e.g., meeting attendees, project leads, or recorded in the Conflict of Interest Register). Disclosure allows the participant to continue involvement in discussions or decisions while ensuring transparency so others are aware of any possible influence.

3.8. **Managed participation:** A conflict control in which a participant's involvement is limited or structured to reduce the risk of the conflict influencing outcomes. Measures may include:

a) Excluding the participant from decision-making on specific items where a conflict exists;
b) Limiting their ability to vote on or approve related matters;
c) Ensuring independent review or oversight of their contributions.

Managed participation allows the participant to contribute expertise while safeguarding impartiality.

3.9. **Complete abstention:** A conflict control in which a participant is fully excluded from any discussion, decision-making, or activity related to the matter in which the conflict exists. This control is used when the conflict is significant and cannot be mitigated through disclosure or managed participation. Complete abstention ensures that decisions are made entirely free from any real or perceived bias.

4. General Principles

4.1. **Transparency:** All contributors must disclose any affiliations, interests, or roles that may influence their contributions to the Framework or Network.

4.2. **Non-commercial Environment:** Network meetings, webinars, and consultation activities are not opportunities for promotion or marketing of products, services, or companies.

4.3. **Fair Participation:** All feedback is welcomed and considered equally, regardless of the commercial, academic, or government background of the contributor.

5. Acknowledgement of Ocean Protect's Conflict

5.1. Ocean Protect openly acknowledges:

a) Its dual role as a commercial entity in the WSUD sector and as the lead facilitator of this initiative.
b) That it may benefit from association with this initiative and industry use of the Framework, such as:
i. Recognition and credibility as a leader in WSUD compliance;
ii. Opportunity to influence industry standards and guidance;
iii. Access to Participant feedback and insights that may inform future product development or research;
iv. Indirect commercial opportunities that could arise from enhanced reputation or visibility.
c) That this perceived or actual benefit presents a potential conflict of interest.

5.2. To mitigate this, Ocean Protect:

a) Declares its involvement in all relevant communications and publicly acknowledges its role and potential benefits.
b) Separates its commercial operations from its role in facilitating the Framework.
c) Ensures that its leadership of this initiative is as transparent, inclusive, and accountable as possible.
d) Seeks and values independent review, input, and oversight from industry stakeholders.
e) Commits to immediate disclosure of any new conflicts that arise during the course of this initiative.
f) Agrees to abide by any mitigation procedures put in place by the Project Lead or relevant Participants to manage conflicts.
g) Encourages Participants to review Ocean Protect's role in this initiative, and provide feedback privately or publicly (e.g. via email or at a Network meeting).

6. Role of the Project Lead

6.1. Daniel Rider is the appointed Project Lead for this initiative. He acknowledges that:

a) He is an employee of Ocean Protect and is paid by Ocean Protect as part of his employment.
b) He may benefit personally from association with the Framework and the Network, such as:
   i. Enhanced professional recognition and credibility as a WSUD compliance leader;
   ii. Opportunities to influence industry standards, guidance, or practices;
   iii. Access to Participant feedback and insights that may inform his professional development or future research; and
   iv. Indirect career opportunities arising from increased visibility within the industry.
c) Daniel's employment and potential professional benefits create a potential or perceived conflict of interest.

6.2. As a result:

a) Daniel is not independent from Ocean Protect and openly acknowledges this.
b) His leadership of the Framework is conducted with full awareness of this conflict of interest, and steps have been taken to ensure transparency and Participant trust.
c) Daniel works to create clear separation between his facilitation of the Framework/Network and any promotional or commercial activity.
d) In his role as Project Lead, Daniel:
   i. Focuses on industry-wide benefit, not commercial advantage.
   ii. Encourages open feedback, including criticism of the Framework and his and Ocean Protect's roles.
   iii. Facilitates meetings and consultation sessions in a way that discourages sales or promotion of any organisation, including Ocean Protect.
   iv. Declares his affiliation and reminds participants of the non-commercial nature of Network discussions.
   v. Maintains a Conflict of Interest Register that documents conflicts, including any benefits received or potential future benefits. This Register is located at the bottom of this policy as Table 1.
   vi. Ensures that all decision-making and advice provided as part of this initiative prioritises industry-wide, environmental, and public benefit over any commercial or organisational gain.
   vii. Commits to immediate disclosure of any new conflicts that arise during the course of this initiative.
   viii. Agrees to abide by any mitigation procedures put in place by relevant Participants to manage conflicts.

6.3. Daniel's involvement is visible and transparent by design. The integrity of the process relies not on removing conflict entirely, but on acknowledging and managing it clearly and consistently.

7. Broader Conflict Management

7.1. Conflicts of interest are common, particularly in initiatives representing and advancing industry interests comprising qualified and experienced industry experts. This depth of knowledge and level of experience for Participants is desirable and necessary to advance the objectives of the Framework and the Network, and conflicts of interest do not always present a problem or stifle robust discussion, especially if they are openly and effectively managed. Refer to Table 2 at the bottom of this Policy for example conflicts of interest & potential risks.

7.2. To ensure integrity across this initiative:

a) All Participants (including Ocean Protect and the Project Lead) must:
   i. Avoid conflicts of interest where possible. Examples of these conflicts are outline in Table 2 at the bottom of this policy.
   ii. Follow this policy and respond to any breaches.
   iii. Disclose their organisation, affiliations, relationships, or potential conflicts when contributing (e.g. at meetings, workshops, or consultations).
   iv. Limit their influence on decisions where they have a direct financial, regulatory, or operational interest (as noted for each group in Table 2).

b) The Project Lead, in consultation with the Network (where appropriate), will:
   i. Ensure multiple perspectives are considered, so that no single participant or group unduly influences decisions.
   ii. Explicitly remind Participants at the beginning of meetings and workshops that these events are not sales environments. Participants are instructed not to use meetings as a platform to promote their own products or services. Any promotional behaviour is discouraged and will be addressed as needed to maintain the professional and non-commercial focus of this initiative.
   iii. Ensure that the Framework is flexible and does not prescribe specific products, technologies, or processes.
   iv. Determine whether a disclosed conflict requires simple disclosure, managed participation, or complete abstention from involvement.
   v. Annually review how conflicts have been managed for the development of the Framework and review the management of conflicts of the Network after each meeting.

8. Additional Conflict Management Controls

8.1. The Project Lead has also implemented the following controls:

a) **Public Declarations:** A Conflict of Interest Disclaimer is included in key documents and at the start of events and presentations.

b) **Transparency of Benefit:** Ocean Protect openly acknowledges its potential benefit from this initiative in various forums, including webinars such as the "**Beneath the Surface of the WSUD Maintenance Compliance Framework**".

c) **Industry Oversight:** The Network was established to enable Participant accountability and support a transparent development process.
d) **Publication of Meeting Records:** All Network meeting recordings and relevant webinars are made publicly available to ensure accountability and accurate records: wsudcompliance.com.au/meetings
e) **Consultation Periods:** A four-month consultation period (April–August 2024) engaged over 500 industry professionals and saw feedback gathered through:

i. Webinars and Q&A sessions
ii. Individual meetings and correspondence
iii. Workshops with state associations
iv. Network meetings

Further feedback opportunities will be provided as the Framework evolves.
f) **Communication & Separation:** A dedicated email address (enquiries@wsudcompliance.com.au) is used for project-related communication. An email disclaimer clarifies that this email is managed by Ocean Protect but used solely for Framework communication.
g) **Governance & Transparency Resources:**

i. A **History and Updates page** shows what updates have been made to the Framework: wsudcompliance.com.au/history
ii. A **Privacy Policy** explains how personal information is collected and used www.oceanprotect.com.au/privacy-policy.
iii. A **Conflict of Interest Policy** explains how any actual, potential, or perceived conflicts of interest associated with the development of the Framework and participation in the Network will be managed: wsudcompliance.com.au/conflict-of-interest
iv. A **User Licence Agreement** ensures proper and protected use of the Framework: wsudcompliance.com.au/license

h) **In-Principle Supporters**: The Project Lead has sought in-principle support from key organisations to validate the Framework's integrity. Supporters may publicly withdraw support if concerns around governance or conflicts arise.
i) **Independent Legal Expertise:** The Project Lead recognises they are not a lawyer and their potential conflict of interest with interpreting the law and legislation, so independent lawyers have been engaged to review and analyse relevant legislation and law.
j) **Future Transfer of Ownership:** Ocean Protect is open to handing over or co-leading this initiative with a willing, capable organisation once identified. Until then, Ocean Protect will continue to lead responsibly and transparently in accordance with this Policy.

9. Reporting Concerns

9.1. If you have questions about this policy or conflicts of interest, please get in touch:

a) Email: enquiries@wsudcompliance.com.au
b) Phone: 1300 354 722

9.2. As for formal reporting mechanisms, individuals are welcome to raise any concerns related to conflicts of interest with one of our in-principle supporters. A current list of these supporters can be found on the **Support** page of our website. These organisations have expressed their support of the Framework and may provide a trusted and informal avenue for concerns to be heard and, where appropriate, raised with the Project Lead or Network.

9.3. The process of determing how to resolve conflicts of interest (as illustrated in 7.2.b.iv) shall be conducted through consultations with the Network via:

a) Surveys,
b) Group discussions,
c) Network meetings, and/or
d) Email correspondence.

10. Review

10.1. This policy will be reviewed and updated as needed, particularly in response to Participant feedback or structural changes to the Framework or Network.

10.2. The history of the review of this policy is provided in the below table.

Version	Date of Issue	Issued By	Reviewed By
Draft	22nd October 2025	Daniel Rider - Project Lead	NA - Being issued for review
1	1st April 2026	Daniel Rider - Project Lead	National WSUD Compliance Network

Table 1: Conflict of Interest Register

This register identifies actual, potential, and perceived conflicts of interest associated with the WSUD Maintenance Compliance Framework project. Mitigation actions for these conflicts of interest have been stated throughout the policy. The inclusion of an organisation or individual does not imply any misconduct; rather, it reflects transparency in recognising areas where interests could overlap or be perceived to do so.

Contributor	Contributor's Primary Undertaking / Area of Expertise	Project Role / Contribution	Description of actual / potential / perceived conflict of interest
Andrew Thomas	Leader in the Australian stormwater industry, with experience in stormwater regulation in local government and active involvement in stormwater-related associations and non-profits.	Independent Integrity Advisor	• Holds multiple leadership positions within the stormwater industry, which may create a perception of influence or alignment between those organisations and the Framework. • Potential perception that his involvement could advantage or reflect the views of the organisations he represents, even though his role is independent. • Access to project information or stakeholder insights that could indirectly inform his broader industry roles. • Personal friendship with the Project Lead (Daniel Rider), which may be perceived as a conflict of interest.
Atlan Stormwater	Manufactures, designs, installs, and maintains WSUD assets	In-principle supporter	Direct commercial opportunities (e.g. maintenance contracts) that could arise from increased regulation.
Benny Penhallurick	Leader in the Australian stormwater industry, with experience in WSUD regulation, management, and consulting.	Paid consultant and in-kind support	• Paid by Ocean Protect to assist with the development, review, and refinement of project ideas and components. • While acting as an independent consultant in December 2023, potential commercial opportunities (e.g. consultancy work) that could have arisen from project development and implementation. • Personal friendship with the Project Lead (Daniel Rider), which may be perceived as a conflict of interest.

Contributor	Contributor's Primary Undertaking / Area of Expertise	Project Role / Contribution	Description of actual / potential / perceived conflict of interest
Clayton Utz	Large law firm providing legal services for large private sector and government clients.	Independent legal review (NSW, Queensland, South Australia, Victoria)	• Paid by Ocean Protect to review legislation • Potential commercial opportunities (e.g. legal advice) that could arise from project implementation and increased regulation.
Cooks River Alliance	Non-partisan partnership between organisations in the Cooks River Catchment.	In-principle supporter	May advocate for policies or programs that align with the interests or priorities of member councils or partners within the Cooks River Catchment.
Daniel Rider	As Ocean Protect's WSUD Specialist, he provides leadership and expertise in WSUD maintenance compliance and stormwater management.	Project Lead	• Paid by Ocean Protect to manage this project, which means he could make decisions that could favour Ocean Protect. • Increased recognition and credibility as a leader in WSUD compliance. • Opportunity to influence industry standards, guidance, and practice. • Access to Participant feedback and insights that may inform future professional development or research. • Access to Participant personal information that could lead to direct and/or indirect commercial or professional opportunities for Ocean Protect. • Indirect career opportunities that could arise from increased visibility within the industry.

Contributor	Contributor's Primary Undertaking / Area of Expertise	Project Role / Contribution	Description of actual / potential / perceived conflict of interest
Franc Sydney	A Stormwater NSW initiative looking to share knowledge and encourage longer-term thinking by the industry.	In-principle supporter	May highlight or discuss the Framework in ways that reflect the perspectives or interests of its host organisation (Stormwater NSW) or contributors.
Ocean Protect	Manufactures, designs, installs, and maintains WSUD assets	Project Partner providing financing and resourcing (Daniel Rider as Project Lead and other staff in supporting roles)	• Increased recognition and credibility as a leader in WSUD compliance. • Opportunity to influence industry standards and guidance. • Access to Participant feedback and insights that may inform future product development or research. • Indirect commercial or professional opportunities that could arise from having access to Participant personal information, and/or enhanced reputation or visibility. • Direct commercial opportunities (e.g. maintenance contracts) that could arise from increased regulation. • Protecting their significant investment in this initiative.
Optimal Stormwater	Auditing, design, operation and construction of WSUD assets.	In-principle supporter	Direct commercial opportunities (e.g. auditing services) that could arise from increased regulation.

Contributor	Contributor's Primary Undertaking / Area of Expertise	Project Role / Contribution	Description of actual / potential / perceived conflict of interest
Page Seager Lawyers	Law firm specialising in commercial legal services.	Independent legal review (Tasmania)	• Paid by Ocean Protect to review legislation • Potential commercial opportunities (e.g. legal advice) that could arise from project implementation and increased regulation.
Page Seager Lawyers	Law firm specialising in commercial legal services.	Independent legal review (Tasmania)	• Paid by Ocean Protect to review legislation • Potential commercial opportunities (e.g. legal advice) that could arise from project implementation and increased regulation.
Stormwater NSW	Association for the NSW stormwater industry.	In-principle supporter and Workshop co-hosts (August 2024 & October 2025)	As an industry association, may advocate for approaches or policies that reflect the interests of its members, some of whom may have commercial or professional involvement in WSUD compliance
Stormwater Queensland	Association for the Queensland stormwater industry.	In-principle supporter and Workshop co-hosts (July 2024)	As an industry association, may advocate for approaches or policies that reflect the interests of its members, including those with commercial or professional roles in WSUD compliance.
Stormwater 2030	An initiative looking to address concerns that the stormwater sector was not adequately addressing.	In-principle supporter	May highlight or discuss the Framework in ways that reflect the perspectives or interests of its host organisation (Stormwater NSW) or contributors (e.g. financial or technical contributions).

Table 2: Example conflicts of interest & potential risks

The table below provides examples of potential conflicts of interest that may arise among different participant groups engaged in the WSUD Maintenance Compliance Framework and National WSUD Compliance Network. These examples are illustrative and intended to promote transparency and awareness. The inclusion of a role or risk does not imply any actual misconduct or bias; rather, it highlights situations where influence should be acknowledged and appropriately managed to maintain the integrity and impartiality of the Network and the Framework's development and implementation. Mitigation actions for conflicts of interest have been stated throughout the policy.

Example Role	Example Risks	When Influence Should be Managed
Catchment / Environmental Groups	• May advocate for specific assets, products, or approaches that align with their projects or donors. • Could be perceived as biased towards certain environmental outcomes or partners.	When contributing and decisions are being made relating to their own, members and/or supporters' products, services, regulation, and operation.
Consultants	• Could be influenced by relationships with specific manufacturers, contractors, or councils. • May have financial interest in consultancy work related to the Framework or asset implementation. • Could favour asset types aligned with their design philosophy, experience, or past projects.	When contributing and decisions are being made relating to consultancy work they offer or could offer (e.g. implementation and operation of compliance programs or development of educational resources).
Federal Government	• Could influence recommendations to align with national policy goals. • May favour contractors, manufacturers, or technologies aligned with federal programs.	When contributing and decisions are being made relating to the regulation or operation of the public WSUD asset they own.
Local Government	• Could favour asset types, contractors, or approaches aligned with existing infrastructure, policy, or resourcing priorities. • May push back against Framework activities due to workload or resourcing.	When contributing and decisions are being made relating to the regulation or operation of the public WSUD asset they own.

Example Role	Example Risks	When Influence Should be Managed
Maintenance Contractors	• May prefer asset types that are easier, cheaper, or more profitable to maintain. • Could have existing relationships with manufacturers or suppliers. • Could be influenced by how they currently do work or how they want/do not want to be regulated.	When contributing and decisions are being made relating to the regulation or operation of their work.
Manufacturers / Suppliers	• Have a direct financial interest in adoption of specifications or regulation that favour their products. • May attempt to influence the Framework to exclude competitors. • Could resist innovation or regulation.	When contributing and decisions are being made relating to the regulation, inclusion or exclusion of their services and products.
Professional Associations	• Could influence recommendations to align with the interests of their members. • May favour certain products, technologies, or approaches that benefit members.	When contributing and decisions are being made relating to their own, members and/or supporters' products, services, regulation, and operation.
Private Asset Owners and Managers	• May favour asset types, maintenance approaches, or service providers that align with their own operational, aesthetic, or cost preferences. • Could resist compliance measures that increase cost or administrative burden. • May have financial or personal interest in contractors, consultants, or manufacturers.	When contributing and decisions are being made relating to the regulation, operation, or maintenance of assets they own or manage.

Example Role	Example Risks	When Influence Should be Managed
Property Developers	• May favour asset types, designs, or approaches that minimise cost, speed up construction, or reduce regulatory burden. • Could prioritise personal or company profit over environmental or community outcomes. • May have relationships with contractors, consultants, or manufacturers that could influence decisions.	When contributing and decisions are being made relating to asset design, implementation, or regulation.
State Government	• Could influence recommendations to align with state policies, procurement practices, or priorities. • May favour contractors, manufacturers, or technologies aligned with state programs.	When contributing and decisions are being made relating to the regulation or operation of the public WSUD asset they own.
Technology Developers / Suppliers	• Have a direct financial interest in adoption of technology or systems that favour theirs. • May attempt to influence the Framework to exclude competitors.	When contributing and decisions are being made relating to the technological services and products they provide.
Universities / Research Organisations	• May have funding, grants, or partnerships tied to specific manufacturers, contractors, consultants, or asset types. • Could have pre-existing academic or methodological biases.	When contributing and decisions are being made relating to the regulation of the WSUD assets their own.
Water Utilities / Corporations	• May influence recommendations in ways that align with existing infrastructure, suppliers, or policy goals. • Could be perceived as favouring certain manufacturers, contractors, consultants, or products.	When contributing and decisions are being made relating to the regulation or operation of the WSUD assets they own.