



The Hon. James Griffin MP
Minister for Environment and Heritage

Your ref: D22/19966
Our ref: MD22/5906

Ms Michelle Coco
A/Chief Executive Officer
Independent Pricing and Regulatory Tribunal
PO Box K35
HAYMARKET NSW 1240

By email: gudny_palsdottir@ipart.nsw.gov.au

Dear Ms Coco

Thank you for your letter seeking a submission on applications from Altogether Huntlee Water Pty Ltd and Altogether Group Pty Ltd to vary their network operator's licence and retail supplier's licence under the *Water Industry Competition Act 2006* (WIC Act).

Regarding your specific questions, I can advise the following.

Question 1 – Has Altogether Huntlee Pty Ltd breached the *Protection of the Environment Operations Act 1997* (POEO Act)?

A search of NSW Environment Protection Authority (EPA) databases for prosecutions, penalty notices and other regulatory actions did not identify any breaches of the POEO Act by Altogether Huntlee Pty Ltd or by Altogether Group Pty Ltd.

Question 2 – Are you aware of any unacceptable risks to the environment posed by the activities to be licensed? If so, what are these risks?

The EPA has concerns that the proposed additional end-uses of recycled water for general washdown for residential / industrial use on hard surfaces and street cleaning may pose an unacceptable risk to the environment. No information has been provided on the water treatment process or treated effluent quality from the scheme. Recycled water is potentially high in nutrients and other pollutants. Washdown and street cleaning would result in the ingress of recycled water into gutters, the stormwater system and a release to environmental waters. Such releases may result in a breach of section 120 of the POEO Act which prohibits the pollution of waters.

Should the applicant require the release of recycled water to environmental waters, they would need to apply for an environment protection licence under Chapter 3 of the POEO Act.

The EPA is not supportive of the proposed additional end-uses of non-potable water (recycled water) as identified in the licence applications based on the information provided with the application submission.

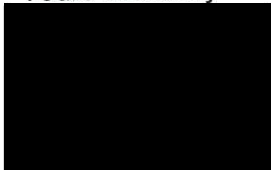
Question 3 – If granted, should the network operator's licence contain any specific conditions in relation to protection of the environment? If so, what conditions do you recommend?

The EPA has no recommended conditions relating to the environment that should be included in either the network operator's licence or retail supplier's licence.

It is the opinion of the EPA that it is the responsibility of the proponents to ensure that all relevant environmental legislation is complied with and that the licensing implemented by IPART should not duplicate legislated environmental requirements.

If you require any further information in relation to this matter, please contact Rob Hogan, Acting Director, Regulatory Operations, EPA on [REDACTED]

Yours sincerely

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Minister for Environment and Heritage

14/6/22