

Mr Rob O'Neill
General Manager, Licensing and Compliance
IPART NSW
PO Box K35
HAYMARKET POST SHOP NSW 1240

Our ref H17/82815

Dear Mr O'Neill

I refer to your request for a submission on the application by Northern Water Solutions Pty Ltd for a new development at Kings Forest under the *Water Industry Competition Act 2006*. Northern Water Solutions has requested a new network operator licence to develop drinking water, recycled water and sewerage infrastructure. Northern Water Solutions has also applied for a retail licence to provide drinking water retail services, recycled water retail services and sewerage services.

Based on the information provided, NSW Health does not support the application to develop drinking water infrastructure and retail supply. The applicant has not provided evidence of their technical capacity to identify and manage public health risks associated with the operation and supply of drinking water infrastructure. The preliminary drinking water risk assessment provided in the application does not identify any risk to human health as a result of contamination of drinking water or treatment failure. NSW Health notes that it is the proponent's responsibility as the water supplier to ensure that all potential public health risks are adequately managed.

NSW Health supports the application for recycled water and sewerage services subject to additional evidence and that the matters raised below are addressed.

NSW Health requests that it is consulted by IPART during the detailed risk assessment for recycled water, technology assessment and the development of a management plan for recycled water. If a licence is granted for drinking water, NSW health also requests consultation at these stages.

I request NSW Health is also consulted following the final compliance audit and before retail supply commences to ensure that all relevant public health matters have been considered. NSW Health also requests that Northern Water Solutions develop an incident notification protocol for incidents including, but not limited to, water quality issues, treatment plant critical control point limit exceedances, algae, recycled water issues, cross connections, and include contact details of all stakeholders involved in this scheme. At this stage of the application, NSW Health does not request any specific licence conditions.

The risk to human health from exposure to recycled water due to a cross-connection, treatment failure or unintended uses has been inconsistently addressed in the risk assessment and requires careful attention. Northern Water Solutions should implement effective controls to protect against cross-connection.

NSW Health

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The application states that the recycled water will be used for many purposes including industry for which the exposure is unknown. The applicant must ensure the proposed treatment train will meet the target log reduction values for all proposed end-uses in accordance with the *Australian Guidelines for Water Recycling*.

NSW Health advises that verification monitoring of both the drinking water and recycled water systems is required at a frequency recommended by the *Australian Drinking Water Guidelines* 2011 and the *Australian Guidelines for Water Recycling: Managing Health and Environmental Risks* 2006. The Public Health Unit and Northern Water Solutions should be notified immediately of any verification results that are outside of *Australian Drinking Water Guidelines* or *Australian Guidelines for Water Recycling* values and in accordance with NSW Health protocols.

NSW Health's submission should not be considered an approval or endorsement of the applicant's documentation. NSW Health's review has focused on potential public health issues. NSW Health expects that the audit process will confirm the adequacy of the drinking and recycled water management plans and compliance with the *Australian Drinking Water Guidelines* and *Australian Guidelines for Water Recycling*.

The granting of a licence under the *Water Industry Competition Act 2006* does not automatically exempt the applicant from the requirement under the *Public Health Act 2010* and Public Health Regulation 2012 to develop and adhere to a drinking water management system.

Thank you for the opportunity to make a submission. Should officers of IPART require further information, please contact Dr Paul Byleveld, Manager Water Unit on [REDACTED]. Should the applicant require further information they may contact Tony Kohlenberg, Environmental Health Officer, Lismore Public Health Unit on [REDACTED].

Yours sincerely

[REDACTED]

Dr Ben Scalley
Director Environmental Health Branch

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