

Council Reference: 23/67516

12 October 2023

IPART – WaterNSW Operating Licence Review 2023-24
By IPART Submission Form

Dear Ms Morahan,

IPART REVIEW OF WATERNSW OPERATING LICENCE 2023-24

Thank you for the opportunity to provide feedback on IPART's WaterNSW Operating Licence Review currently on public exhibition.

For context, Singleton Council (Council) is a local water utility accessing water directly from Glennies Creek Dam (part of the Hunter Regulated River System) via a valve in the dam wall for treatment and supply to approximately 19,000 customers in Singleton, Mount Thorley and Broke. Council also supplies water to the town of Jerrys Plains through an arrangement with AGL Macquarie whereby they extract and treat water from the Hunter Regulated River on Council's behalf and bulk supply it to Council for reticulation.

Whilst Council has a typically good relationship with WaterNSW's operational staff at Glennies Creek Dam, Council has, at times, been challenged where there has been little awareness on Council's part of dam operating rules, forewarning of maintenance activities or changes in operations and a lack of ability to influence activities/have our concerns considered. To this end, please see three examples below that demonstrate these challenges and give background to Council's submission.

Geosmin in Glennies Creek Dam

In 2022, Council experienced raw water quality with Geosmin levels of ~1,400ng/mL being supplied from Glennies Creek Dam. This resulted in a large volume of taste and odour complaints as, at these levels, Council had very limited abilities to treat water to below the human taste/odour threshold of 10ng/mL. Understandably, Councillors and the community had a high level of concern and expectation that Council should and would take action to improve the water quality. Council increased its powdered activated carbon dosing and made changes at Obanvale Water Treatment Plant but also identified that drawing water from a lower depth may have some benefit in its naturally lower levels of Geosmin. Unfortunately, Council had significant difficulty in

finding someone within WaterNSW who was willing and able to work with us to reduce the offtake levels to a point where the Geosmin concentrations were lower. Thankfully we were able to find someone within WaterNSW who understood our challenges and was able to negotiate lowering of the offtake however the issue persisted longer than many in the community would have liked.

Fingerling Fish

In 2016, Council observed a large volume of fingerling fish in the filters at Obanvale Water Treatment Plant having come down in the raw water from Glennies Creek Dam. After contacting WaterNSW and assuring them that the fish breeding was not occurring at the treatment plant, we were able to negotiate for the offtake to be lowered below the warmer top layer of the dam where the fish were spawning. Active monitoring of dam conditions and taking appropriate prior action could have prevented these fish from not making it to adulthood.

Syphoning

In 2020, Council's supply from Glennies Creek Dam was interrupted when Council's raw water main was syphoned. A large release from WaterNSW's bypass valve at Glennies Creek Dam during maintenance on the main valve had caused syphoning from Council's valve and interrupted supply. Following contact with WaterNSW, Council was able to negotiate a reduction in the release with the WaterNSW. However, operational staff but they were understandably cautious given they had been given instructions to release a certain volume of water in a particular timeframe.

Please see Council's submission to the relevant questions for comment within the Issues Paper.

- 1. Should WaterNSW's obligation to undertake catchment management activities extend to the non-declared catchment? If so, what could WaterNSW do in the non-declared catchment to encourage catchment management practices and source water protection? What are the benefits?*

Yes – drinking water providers rely on WaterNSW's effective catchment management in non-declared catchments and downstream communities are put on the back foot if WaterNSW is not actively engaging with property owners and occupiers within the catchment. This catchment management could include restrictions on 88B instruments, catchment risk assessments and regular education programs.

Noting that WaterNSW owns large portions of the immediate catchment around Glennies Creek Dam but is not currently required under its operating licence to undertake catchment management which is out of step with community expectations.

- 2. Should WaterNSW be required to undertake a program of research in both the declared and the non-declared catchments?*

Yes – it would potentially be expected that non-declared catchments are less well understood so should be further investigation to understand the catchment, the risks and potential opportunities.

3. *Should WaterNSW be required to undertake education programs in the community for both the declared and non-declared catchments?*

Yes – education programs would almost be more important in the non-declared catchments given WaterNSW's limited ability to control activities occurring in the catchment.

4. *Should the Licence specify what the education programs should include? If so, what should it specify?*

The licence should specify a mix between active, for example direct contact with land holders on a regular basis and passive education programs, for example social media and website information. Particularly for non-declared catchment areas these education programs should extend beyond passive availability of information and rather be a proactive engagement with and support to property owners on their abilities to reduce the risk of contamination in the catchment.

5. *Should WaterNSW be required to manage river health, beyond monitoring and reporting against the catchment health indicators identified in the reporting manual?*

Yes – if WaterNSW is not managing river health (particularly of its regulated rivers) then activities to manage river health will continue to be on an ad-hoc basis and typically only undertaken by works approval holders to benefit their usage and extraction only.

30. *Should WaterNSW be required to define and monitor Water Quality Performance targets in consultation with NSW Health and relevant stakeholders?*

Yes - acknowledging that WaterNSW does not (typically) produce drinking water, however, its operations can have a significant impact on the ability of its customers to produce drinking water. Defining and monitoring water quality performance targets as well as action that can be taken by WaterNSW to improve water quality, including changing offtake levels/locations and aeration, would encourage a partnership arrangement with WaterNSW and drinking water providers to get a better quality outcome.

35. *Is there benefit in increasing WaterNSW's responsibilities to monitor and provide information on water source events and the quality of raw water supplied to LWUs?*

Yes - to continue to rely on the passive nature of an LWU making requests for water quality would be a missed opportunity. The power of water quality information for drinking water is often in collecting and acting on contemporaneous information rather than making ad-hoc requests for large data sets after the fact (acknowledging the power of these data sets for planning purposes).

It would be appreciated if a partnership approach between WaterNSW and LWUs could be developed. This would enable data sharing on a timely basis.

36. Should the information request procedure be recast to require WNSW to provide information to the LWU when specified parameters have not been met?

Yes – this would aid in active water quality management for LWUs and make best use of the water quality information collected in a timely manner.

37. How else could WaterNSW be more proactive in notifying LWUs of water source events or sharing of information?

Forming an event response team (or similar) for specific events that challenge or threaten either the supply or quality and result in significant challenges for water treatment would be of significant benefit to LWUs. These events could include bushfire, flood, blue green algae and drought.

This would enable preparing for immediate challenges with water quality and treatment (e.g. fire, flood, blue green algae) or with longer term challenges with water supply (e.g. drought).

Although drought information and update is provided through the , Councillors and the community would often appreciate additional information and understanding given their heightened sense of awareness and willingness to help conserve water.

40. Is there any value in continuing to require WaterNSW to utilise CAGs to engage with different customer groups?

CAGs are of value typically to those who are directly involved or those who represent a strong alliance of water users. They are not a successful mechanism to engage with water users on operating and water quality issues.

57. How effective are the current mechanisms in achieving the required relationship and information sharing needs between WaterNSW and LWUs?

The current mechanisms are ineffective. Council being on a register of LWUs does not currently provide Council with any WaterNSW contacts, consultation methods, early warnings or ability to request changes to WaterNSW operations to support LWU activities.

58. Should WaterNSW be required to manage its relationships with LWUs through an MOU, protocol or policy?

Council would appreciate the development of an MOU, protocol or policy to enable a partnering arrangement with Water NSW.

If you have any further enquiries, please do not hesitate to contact employees first and last name on telephone [REDACTED]

Yours faithfully,

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