



Licence compliance under the
Water Industry Competition Act 2006
(NSW) 2024-25

Annual Compliance Report to the Minister

October 2025

Water »

Acknowledgment of Country

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We pay respect to their Elders both past and present, and recognise Aboriginal people's unique and continuing cultural connections, rights and relationships to land, water and Country.

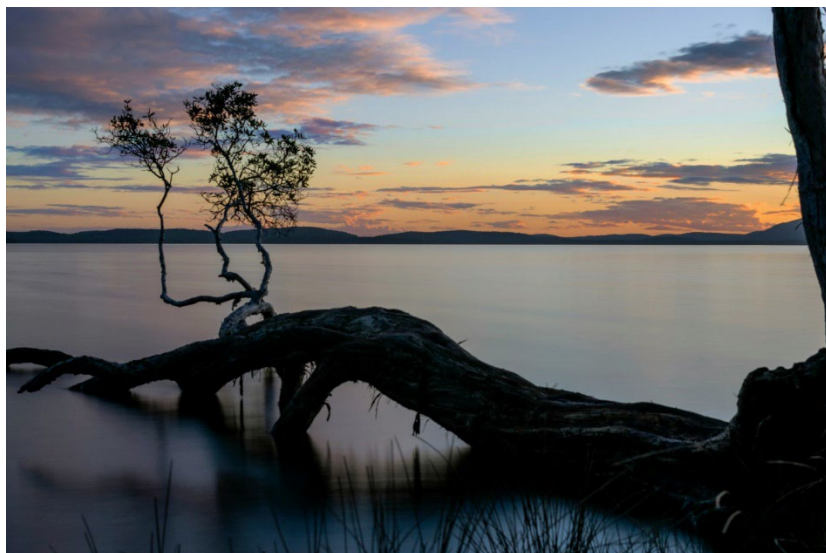


Image taken on Worimi Country (Myall Lakes)

The Independent Pricing and Regulatory Tribunal

IPART's independence is underpinned by an Act of Parliament. Further information on IPART can be obtained from [IPART's website](#).

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Executive summary

This report discusses the annual compliance activities for licences granted under the [Water Industry Competition Act 2006](#) (WIC Act) and regulated by the Independent Pricing and Regulatory Tribunal (IPART). It sets out the compliance outcomes for the 2024-25 financial year (2024-25 reporting period), key changes in the water industry, and performance data for WIC Act licensees.

The WIC Act was amended by the [Water Industry Competition Amendment Act 2021](#) to create a new regulatory framework for the private water industry. The transition period for the amended WIC Act ended on 28 February 2025 which was part-way through the 2024-25 reporting period. Most of the WIC Act licensees were transitioned to the new WIC Act regime, however this report includes discussion of compliance activities and performance information up until 28 February 2025 for network operator licensees which were regulated under the former WIC Act. We discuss the key changes resulting from the new WIC regulatory regime as well as the impact this has had on compliance activities.

IPART's role in the regulation of the WIC Act in the 2024-25 reporting period is summarised below.

Transition to the new WIC Act regulatory framework



We transitioned a total of 14 operator licences and 7 retailer licences under the amended WIC Act. 4 network operator licences and 5 retail supplier licences were no longer required to be licensed under the amended WIC Act because they no longer meet the licensing threshold^a. They are now regulated by local councils under the *Local Government Act 1993*, instead of the WIC Act (see Box 1.1).

Monitoring licensee compliance in 2024-25



We undertook 13 compliance audits in 2024-25. These audits were completed against the network operator licences which are no longer in force as of 1 March 2025. There was a total of 13 non-compliances identified through audits. Licensees reported an additional 5 non-compliances which have not been assigned a materiality grade by IPART and will be reviewed at the next compliance audit.

Applications received in 2024-25



We received 3 applications in 2024-25. This included 1 combined application for an operator and retailer licence, 1 application to vary an operator licence and 1 application to modify the deemed customer contract for a licensee.

Emerging trends in the water industry



We monitor emerging trends and changes across the water industry. Key trends included the management of excess recycled water, the water balance and changes to the competitive market.

^a The amended WIC Act licensing threshold is intended to exclude schemes that are small or low risk.

Commencement of the amended WIC Act

The amended WIC Act and the new *Water Industry Competition (General) Regulation 2024* (WIC Regulation) took effect from 1 March 2024, followed by a 12-month transition period for existing licences. The new framework introduced state-wide operator and retailer licences, moving away from scheme-specific licences.

Box 1.1 Note on terminology used in this report

Under the amended WIC Act licensing and approvals framework, the terminology used for WIC Act licences has changed.

Network operator licence: the name used for the scheme-specific operational licences used under the former WIC Act. A network operator licence set out a licensee's obligations to operate a WIC Act scheme. These licences are no longer in force as of 1 March 2025.

Retail supplier licence: the name used for the scheme-specific retail licences used under the former WIC Act. A retail supplier licence set out a licensee's obligations to sell services for a WIC Act scheme. These licences are no longer in force as of 1 March 2025.

Operator licence: the name used for a state-wide operational licence granted by the Minister. Licensed operators have the authority to construct and operate a determined number of schemes of a specified size and type.^a These licences are in force from 1 March 2025 onwards.

Retailer licence: the name used for a state-wide retail licence granted by the Minister. Licensed retailers are authorised to sell the provision of water and sewerage services to small retail customers.^b These licences are in force from 1 March 2025 onwards.

Scheme approval: the name used for a scheme-specific approval granted by IPART. A scheme approval authorises the construction of a scheme and specifies the size, type and area of operations for a scheme.^c A WIC Act licensee cannot construct a scheme without being granted scheme approval. Each scheme has its own scheme approval.

Operational approval: the name used for a scheme-specific operational approval granted by IPART. An operational approval is granted after the construction of a scheme and authorises a WIC Act licensee (the registered operator) to operate the scheme.^d A WIC Act licensee cannot operate a scheme without being granted operational approval. Each scheme has its own operational approval.

a. *Water Industry Competition Act 2006* (NSW), s 8E.

b. *Water Industry Competition Act 2006* (NSW), s 8F.

c. *Water Industry Competition Act 2006* (NSW), s 7H.

d. *Water Industry Competition Act 2006* (NSW), s 7I.

Both licences and approvals can be varied to accommodate changes in schemes or infrastructure.¹ The framework strengthens IPART's oversight capabilities by expanding its auditing and reporting functions and increasing its investigative powers and penalties for violations.²

The new framework enhances customer protection and service standards for small retail customers through the introduction of last resort arrangements and the establishment of a deemed customer contract, which aligns with the standard customer contracts used by Sydney Water and Hunter Water.^{3,4}

We have transitioned a total of 14 operator licences and 7 retailer licences to the amended WIC Act licensing and approvals framework. The licences granted under the former WIC Act are no longer in force as of 1 March 2025.

We discuss the commencement of the amended WIC Act further in section 3.1.

Licensee compliance in 2024-25

We completed 13 compliance audits in the 2024-25 reporting period. These audits reviewed WIC Act licensee's compliance against their network operator licences and the requirements under the former WIC Act.

To provide WIC Act licensees the time to accumulate evidence of compliance under their new licences, we did not complete any compliance audits against the transitioned operator or retailer licences between 1 March 2025 and 30 June 2025. We have planned compliance audits to commence from October 2025.



There were more non-compliances compared to 2023-24

There was an increase in the number of non-compliances (non-material) identified in 2024-25 compared to 2023-24. Most of the non-compliances identified, both material and non-material in nature, were the result of WIC Act licensee's failure to fully implement and review their water quality plan or sewage management plan.

WIC Act licensees are required under the WIC Regulation to fully implement, regularly review and carry out activities in accordance with the licensee's water quality plan⁵ and/or sewage management plan⁶. These requirements are present in the repealed WIC Regulation (2021) and the new WIC Regulation (2024).

There was 1 material non-compliance identified against Kyeema Water Pty Ltd's (Kyeema Water) Gundaroo scheme. Kyeema Water was found to have not complied with its network operator licence obligation to fully implement and carry out activities outlined in its Sewage Management Plan (SMP). This included a finding that most of the critical and alert limit settings on the SCADA^b system were incorrect for a period of more than 10 weeks. The critical and alert limits notify the operator if a treatment process is not functioning as expected.

The Tribunal requested Kyeema Water implement the recommendations made by the auditor resulting from the identified non-compliance. Kyeema Water reported to IPART that they immediately rectified the errors in the SCADA system and have developed and implemented checks and processes to prevent a similar incident from occurring again in the future. We did not take further compliance action against Kyeema Water and consider its actions to address the non-compliance to be appropriate. We will check that Kyeema Water has appropriately addressed the non-compliance at the next compliance audit to be held later this year.

We discuss licensee compliance further in section 1.

Licence and scheme applications in 2024-25

We received 3 applications under the new WIC Act licensing and approvals framework during the 2024-25 reporting period. They were:

- 1 combined application for a new operator licence and retailer licence for coNEXA Projects and Operations Pty Ltd (coNEXA)
- 1 application for a variation to Aquacell Pty Ltd's (Aquacell) operator licence
- 1 application for a modification to the deemed customer contract for Altogether Group.

We received 1 scheme approval application for a grey water recycling scheme at Spring Square. However, the application did not provide sufficient information and has been put on hold pending a decision as to whether the application will progress.

^b A SCADA (Supervisory Control and Data Acquisition) system monitors and controls the function of a water utility across its area of operation. A SCADA system will alert a registered operator if there is an exceedance in certain control settings.

All network operator licences and retail supplier licences issued under the former WIC Act are no longer in force. Of these, 4 network operator licences and 5 retail supplier licences are no longer required to be licensed under the amended WIC Act because they do not meet the licensing threshold.^c They are now regulated under the *Local Government Act 1993*, instead of the WIC Act.

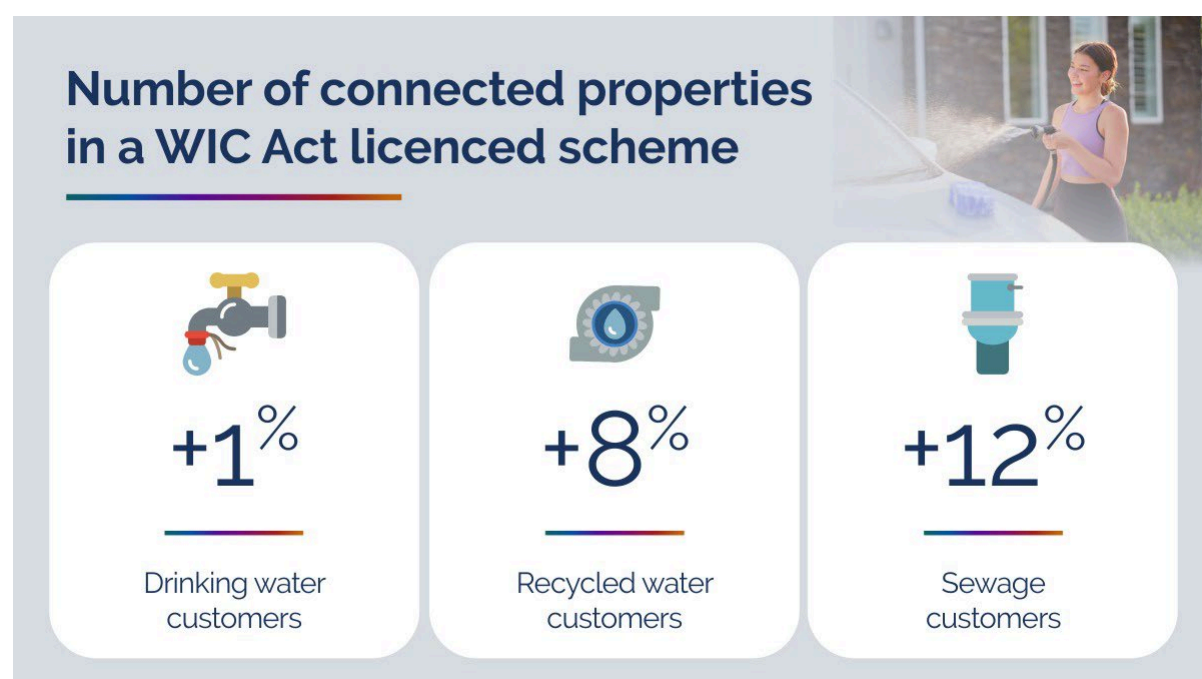
At the request of 2 WIC Act licensees, we varied 4 licences which transitioned under the new WIC Act licensing and approval framework. These variations were made to the operator and retailer licences for Aquacell and True Water Pty Ltd (True Water).

We anticipate there will be an increase in the number of applications for scheme approvals and operational approvals during the 2025-26 reporting period. We have received initial enquiries from potential applicants who are considering new schemes or the expansion of schemes currently under construction or operation.

We discuss licence and scheme applications further in section 2.

Emerging trends in the water industry

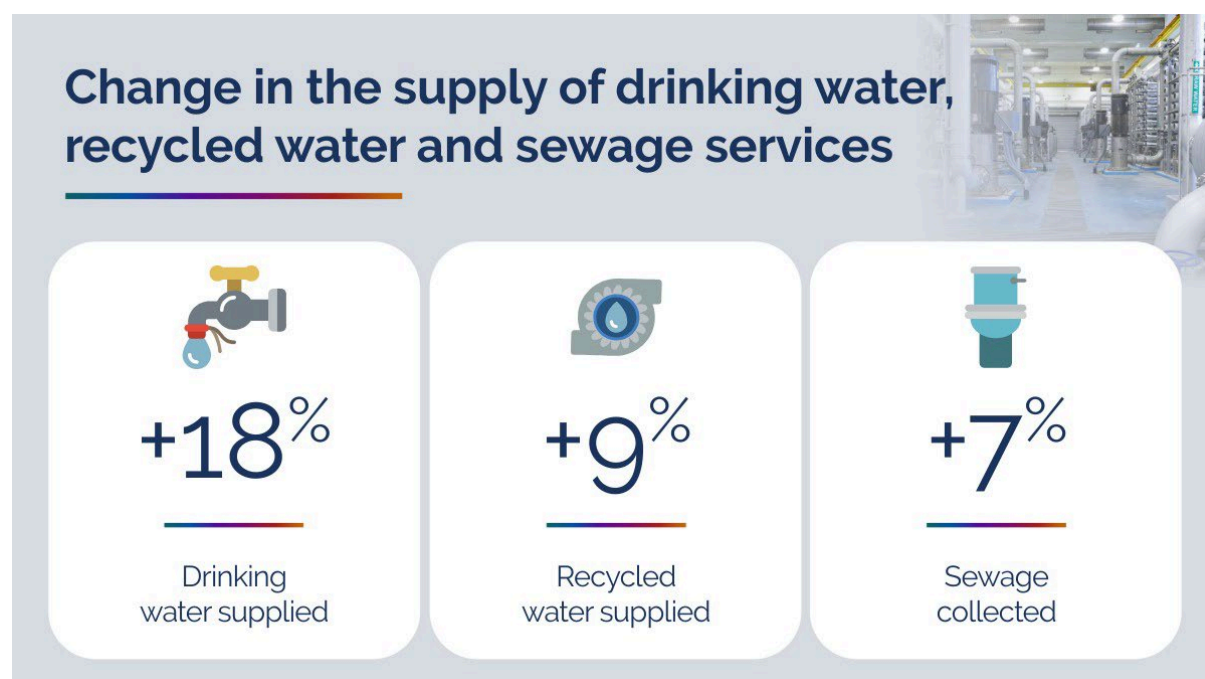
The total number of customers receiving services from a WIC Act licensed scheme increased in 2024-25. All licensees reported an increase in the number of connected customers across different services they offer. The infographic below provides a snapshot of the number of connected properties (residential and non-residential) in 2024-25.



Source: IPART analysis of annual compliance reports and performance statistics submitted by WIC Act licensees.

^c The amended WIC Act licensing threshold is intended to exclude schemes that are small or low risk.

We received partial reporting for network operator and retail supplier licences which are no longer in force as of 1 March 2025. These licensees provided performance indicator data for the period 1 July 2024 to 28 February 2025. Most WIC Act schemes increased the number of recycled water and sewage connections this year. Below is a snapshot of the volumes of the supply of drinking water, recycled water and collection of sewage in the 2024-25 reporting period.



Source: IPART analysis of annual compliance reports and performance statistics submitted by WIC Act licensees.

The increase in drinking water supplied does not include Sydney Desalination Plant (SDP). SDP supplies bulk drinking water to Sydney Water and at full capacity can service up to 15% of Greater Sydney's total drinking water. For 2024-25, Sydney Water ordered the minimum baseline production of drinking water from SDP (23 gegalitres).⁷

The private water industry remains a key contributor to achieving the aims of the *Greater Sydney Water Strategy* (GSWS). The GSWS includes an aim to make greater use of recycled water as a rainfall-independent supply source. There was a 9% increase in the total volume of recycled water supplied. This reflects an increase in the number of residential recycled water connections across WIC Act schemes. Additionally, there has been around a 7% increase in the total volume of sewage collected in 2024-25 across WIC Act schemes.^d

We expect the number of connected recycled water and sewage customers to increase over the coming years as the competitive market and demand for private water schemes grows.

We discuss emerging trends in the water industry further in section 3.2.

^d Altogether Group previously reported the volume of sewage collected including any sewage discharged to third parties, such as Sydney Water. As of the 2024-25 reporting period, untreated sewage discharged to third parties has no longer been counted in Altogether Group's submitted licence data. To ensure we can show the true year-on-year change in volumes collected, Altogether Group provided their 2023-24 financial year data for sewage collected using the changed reporting method. For 2023-24, Altogether Group reported the total volume of sewage collected as 1,409 ML. The adjusted total (excluding sewage discharged to third parties) is 923.7 ML.

1 Licensee compliance in 2024-25

We undertook 13 compliance audits between 1 July 2024 to 28 February 2025. These audits reviewed licensees' compliance with the former WIC Act and their network operator licences. Compliance audits under the amended WIC Act will begin later this year.



Most licensees demonstrated a high level of compliance with their licence conditions in 2024-25, with 73 of the 92 total conditions audited across licences found to be compliant. Of the 13 audited network operator licences, 4 licensees were compliant with all their licence conditions. 8 licensees were found to have only non-material non-compliances, and 1 licensee was found to have 1 material non-compliance.

We employed a range of compliance tools to keep regulated entities accountable and to consider the risk associated with their activities and the expected level of compliance during the 2024-25 reporting period. Further information on these tools is in the [IPART Compliance and Enforcement Policy](#).

We did not audit the transitioned operator or retailer licences between 1 March 2025 and 30 June 2025. We plan to commence compliance audits with the new WIC Act requirements for operator and retailer licences from the end of 2025. This approach allows WIC Act licensees to effectively adapt to the new licence conditions and requirements.

We conducted a pre-operational audit for 1 licensee this year. We require a pre-operational audit to assess the compliance of the scheme infrastructure prior to issuing operational approval for a scheme. A WIC Act scheme must receive operational approval before commencing operation and providing services to customers.⁸ An operational approval sets out the conditions under which a scheme will operate. The pre-operational audit of True Water's Ashbourne scheme found the scheme was constructed appropriately and could operate safely and in accordance with its systems and plans.

In the sections below we discuss the compliance performance of WIC Act licensees for 2024-25, as well as the potential compliance challenges we have observed following the transition to the amended WIC Act.

1.1 Network operator licences and operator licences

There are 14 operators licensed under the WIC Act as of 30 June 2025. We audit registered operators against conditions in the operating licence, WIC Act and WIC Regulation, as well as relevant conditions in the scheme and operational approvals for a licensee. Registered Operators are also required to self-report any non-compliances through their annual report or when they are identified throughout the year.

In 2024-25, 9 network operator licences were identified to have a non-compliance. Table 1.1 details these non-compliances and how they were identified.

Table 1.1 There were 18 non-compliances identified in 2024-25

Licensee	Non-compliances identified at audit			Self-reported ^a	Total
	Material	Non-material			
Altogether Central Park Pty Ltd	0	2	0		2
Altogether Cooranbong Pty Ltd	0	1	1		2
Altogether Discovery Point Pty Ltd	0	2	0		2
Altogether Huntlee Pty Ltd	0	1	2		3
Altogether Operations Pty Ltd	0	1	1		2
Altogether Pitt Town Pty Ltd	0	1	1		2
Aquacell Pty Ltd (Kurrajong scheme)	0	3	0		3
Kyeema Water Pty Ltd	1	0	0		1
Veolia Water Solutions and Technologies (Australia) Pty Ltd ^b	0	1	0		1
Total	1	12	5		18

Note: The 2 potential non-compliances against the individual metering provisions have not been included in this table.

a. Self-reported non-compliances will be reviewed at the next compliance audit for licensees. They have not been assigned a compliance grade.

b. Veolia Water Solutions and Technologies (Australia) Pty Ltd did not transition under the new WIC Act licensing and approvals framework.

Source: IPART analysis.

There was an increase in the number of non-compliances identified in 2024-25 compared to the 2023-24 reporting year. In 2023-24 we reported a total of 10 non-compliances, including 1 material non-compliance. We discuss the nature of the non-compliances identified in 2024-25 in the sections below.

1.1.1 Network operator licensees that had material non-compliances

There was 1 licensee that had a material non-compliance. This non-compliance was identified against the network operator licence for Kyeema Water Pty Ltd which was in force prior to 1 March 2025.

Kyeema Water Pty Ltd

The compliance audit of Kyeema Water's Gundaroo sewerage scheme identified 1 non-compliance (material). The audit was finalised on 15 January 2025.

Kyeema Water was found to have not complied with its network operator licence obligation to fully implement and carry out activities outlined in its Sewage Management Plan (SMP). This included a finding that most of the SCADA system critical and alert limit settings for critical control point (CCP) parameters were incorrect for a period of more than 10 weeks. The critical and alert limits notify the operator if a treatment process is not functioning as expected.

Kyeema Water immediately rectified the errors in the SCADA system and has developed and implemented checks and processes to prevent a similar incident from occurring again in the future.

The Tribunal requested Kyeema Water implement all recommendations from the auditor and provide IPART with a report on the progress in implementing these recommendations, including steps to address the recommendations and a timeline for completion.

Kyeema Water has confirmed with IPART that the auditor recommendations have been implemented.

We note that the Kyeema Water scheme does not supply recycled water to customers but instead treats sewage prior to disposing of the treated effluent via irrigation to land. As such, the risk to public health and safety is considered low. We did not take further compliance action against Kyeema Water in this instance and consider its actions to address the non-compliance to be appropriate. We will verify that the non-compliance has been fully addressed at the next compliance audit, scheduled for later this year.

1.1.2 Network operator licensees that had non-material non-compliances

There were 8 licensees that we identified as having non-material non-compliances. These non-compliances were against network operator licences that were in force prior to 1 March 2025.

Altogether Group (multiple schemes)

6 of Altogether Group Pty Ltd's (Altogether Group) Licences were audited together. The combined compliance audit of Altogether Group's network operator licences found a total of 8 non-compliances (non-material) across all 6 of Altogether Group's licences.

6 Altogether licensees were found to have not complied with their network operator licence obligation to fully implement and review the licensee's recycled water quality plan. The matters of concern included:

- internal audit schedules had not been fully implemented and the effectiveness of preventative measures were not regularly reviewed for all schemes
- a smaller area used for irrigation compared to original modelling at the Pitt Town scheme, which may impact the sustainable irrigation rate
- incorrect coloured pipework in the irrigation area at the Box Hill scheme

- incorrectly applied rapid assessment tool for the Box Hill scheme.

Altogether Central Park and Altogether Discovery Point were found to have not complied with their network operator licence obligation to fully implement and review the licensee's sewage management plan in relation to trade waste agreements held with the downstream sewerage provider. The trade waste agreements contain obligations that were not always met by the licensee in the audit period. These trade waste agreements set out the management of ecological and environmental risks for the Central Park and Discovery Point schemes. The non-compliance was considered non-material as the environmental risk of discharging lower pH water into the sewerage network is considered to be very low.

We will continue to monitor Altogether's implementation of its water quality and sewage management plans. We did not take compliance action against Altogether Group as Altogether Group have provided evidence that they are progressing these recommendations. We expect they will be completed for review by the next compliance audit in 2026.

Aquacell (Kurrajong scheme)

A compliance audit of Aquacell Pty Ltd's (Aquacell) Kurrajong sewerage scheme identified 2 non-compliances (non-material).

Aquacell did not fully implement and review its Sewage Management Plan (SMP) in relation to management of water quality sample collection and transport procedures. This is considered a repeat non-compliance.

Aquacell also did not comply with its network operator licence obligation to immediately notify any incidents to IPART and other stakeholders. This included separate incidents of a sewage overflow, and the identification of elevated levels of *E. coli* which exceeded set limits. In both instances the incidents were contained and the public was not exposed to health risk. Aquacell notified all stakeholders once it became aware of its obligation.

Aquacell has implemented the audit recommendations to address the failings that led to these non-compliances. We did not consider further compliance action was warranted but will test Aquacell's incident notification in future audits.

Veolia Water Solutions and Technologies (Darling Quarter scheme)

The compliance audit of Veolia Water Solutions and Technologies (Australia) Pty Ltd's (VWST) Darling Quarter scheme identified 1 non-compliance (non-material).

VWST did not fully implement and review its water quality plan for recycled water in relation to critical control point limits. Exceedances of the limits occurred during plant shutdown and restart. No water was provided to customers during the startup procedure, and out of specification water was returned to the head of the plant for treatment.

The VWST licence and Darling Quarter schemes were not required to transition under the amended WIC Act as they no longer meet the licensing threshold and are no longer regulated by IPART. VWST and the Darling Quarter scheme will now be regulated by the City of Sydney Council. We have provided a copy of the auditor's report to the City of Sydney Council, which is now responsible for regulating the Darling Quarter scheme.

VWST advised it is taking steps to implement the audit recommendation and is working with the infrastructure owner to upgrade the treatment plant, which will address the underlying start up issue. We consider that the non-compliance will be sufficiently addressed once implemented by VWST and therefore did not take further enforcement action against the licensee.

1.1.3 There were 5 self-reported non-compliances

We introduced a revised [Reporting Manual for licensed operators and retailers under the *Water Industry Competition Act 2006*](#) (WIC Act reporting manual) in March 2025 which aligned with the new reporting requirements under the amended WIC Act. The new reporting manual maintained the simplified approach to reporting self-identified non-compliances which we introduced in April 2022.⁹

Altogether Group self-reported 5 non-compliances across 4 schemes in their annual compliance reports. These non-compliances have not been assigned a materiality grade by IPART and will be checked at the next compliance audit. All incidents related to non-compliance with WIC Regulation schedule 2 part 2 section 8, which requires full implementation and regular review of the water quality management system. No customers were affected and corrective actions have been taken in each case.

- **Altogether Cooranbong, Huntlee, Pitt Town:** A network outage disrupted SCADA systems for 89 minutes, affecting monitoring and data logging. Altogether has since upgraded its internet service, added a satellite backup, and implemented automatic rebooting for data loggers.
- **Altogether Box Hill:** An *E. coli* exceedance occurred due to low chlorine levels caused by stagnation in a recycled water storage tank. Altogether isolated the tank, conducted follow-up testing, and introduced weekly tank switching and SCADA alarms to maintain chlorine levels.
- **Altogether Huntlee:** Excess stormwater and system design issues led to a low chlorine contact time, breaching disinfection requirements. Altogether repaired the aeration grid and redesigned pipework to prevent recurrence.

There were no additional self-reported non-compliances made through our WILMA portal^e throughout the reporting period.

1.1.4 There were 11 self-reported incidents

Licensees reported 11 incidents during the reporting period. Reportable incidents include events in the conduct of licensee's activities that threaten, or could threaten, water quality, public health or safety. A reported incident is not always the result of a non-compliance with the operator or retailer licence. Table 1.2 below provides an overview of the reported incidents in the 2024-25 reporting period.

^e WILMA is our *Water Industry Licensing Management Application*. We use WILMA to manage WIC Act compliance activities for licensed entities. This includes receiving incident notifications, undertaking audits and managing non-compliances.

Table 1.2 There were 11 self-reported incidents in 2024-25

Licence	Licence No.	Incident type				
		Water quality	Sewage overflow	Environmental	Pipe break	Other
Kooragang Network operator Licence	25_013	1				
Altogether Huntlee Operator Licence	24_005	1			1	
Altogether Operations Operator Licence	25_006	1				
Not in force – Altogether Operations (Box Hill)	16_037		4	1		
Not in force – Altogether Cooranbong	15_033	1				
Not in force – KIWS Network Operator licence	22_046					1
Total		4	4	1	1	1

Source: WILMA – Incident notifications.

A licensee is required to report immediately once an incident report is submitted.¹⁰ They must provide sufficient information for IPART and other regulators to understand whether there is an imminent risk that needs to be managed.

We received one reported incident relating to somatic coliphage detection impacting recycled water quality. We are currently investigating this incident to determine whether it may constitute a compliance issue. Additionally, we are reviewing a reported sewage overflow and discharge incident to assess whether further action is required. Both incidents will be followed up at the next compliance audit.

We did not consider any of the other 9 reported incidents to indicate a non-compliance with the licence requiring further action. They did not impact on water quality, public health or safety and sufficient actions were taken to remedy the cause of the incident.

We will follow up on all reported incidents in the next compliance audits to ensure that the actions taken by licensees in response to the incident were appropriate and any outstanding risks have been addressed by the licensees.

1.2 Retail supply licences and retailer licences

We did not audit any retail supplier licences or retailer licences during the 2024-25 audit period. There are 7 retailer licences currently licensed under the WIC Act. Retailer Licence obligations will be included in compliance audits over the next 5-year audit period.

1.3 Potential compliance challenges for transitioned licences

The amended WIC Act introduced new and varied requirements for WIC Act licensees. We note that these new requirements have posed potential challenges for transitioned licensees to maintain compliance with the WIC Act and WIC Regulation.

We acknowledge that some instances of non-compliance with the new requirements may be unintentional, as licensees adjust to the changes introduced by recent amendments to the WIC Legislation. To support this transition, we have developed guidance materials and will continue to work collaboratively with licensees to help them understand and meet their compliance obligations.

These compliance challenges include:

Publication and notification of contract charges: The amended WIC Act legislation introduced new requirements for notifying customers of price increases and publishing fees and charges on a licensee's website.¹¹ We received enquiries from various WIC Act licensees, highlighting inconsistent interpretation of these new obligations, particularly regarding when they need to notify customers and IPART. To support compliance, we have published guidance on our website¹². However, we anticipate licensees may take time to achieve compliance as they become familiar with the new requirements.

New requirement for all premises under a scheme to be individually metered: The amended WIC Act legislation introduced new requirements for all schemes to ensure that each premises is individually metered.¹³ We are aware that some schemes have been unable to comply with this requirement as they were constructed and operating prior to the amended legislation coming into effect.

Installing property meters in these locations presents significant logistical and financial challenges, particularly for schemes servicing high-rise apartments, where retrofitting meters after construction is especially difficult. This process would be at a significant cost which will likely be borne by the customer.

We are working with the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) and relevant licensees to support future compliance with this requirement.

2 Licence and approval applications in 2024-25

The new WIC Act licensing and approvals framework has changed how licences and approvals are granted. The key change for applications under the new framework is:

- the Minister grants operator licences and retailer licences
- IPART grants scheme approvals and operational approvals.

When assessing a licence application to grant or vary a licence, we consider the technical, organisational and financial capacity of the applicant¹⁴, and when assessing a scheme approval we consider details specific to the scheme such as the construction and operation of the scheme, possible impacts to customers, communities, the environment and public health.¹⁵ We assess applications for both licences and approvals with a high degree of scrutiny. For a licence, we will not make a recommendation to the Minister to grant a licence unless we are satisfied that all the requirements for operating safely under a licence can be met by the applicant.

2.1 Licences granted, varied or cancelled in 2024-25

2.1.1 There were no licences granted in 2024-25

We did not recommend the Minister grant any licences during the 2024-25 reporting period.

Transitioned licences are discussed further in section 3.1 below.

2.1.2 Licences not transitioned under the amended WIC Act

All network operator licences and retail supplier licences issued under the former WIC Act ceased to be in force on 28 February 2025. Of these, 4 network operator licences and 5 retail supplier licences did not transition under the new WIC Act licensing and approvals framework because they no longer met the licensing threshold under the amended WIC Act.^f These schemes are now regulated by local councils under the *Local Government Act 1993*. Table 2.1 and Table 2.2 provide a snapshot of the licences which were not transitioned.

Table 2.1 There are 4 network operator licences no longer regulated under the amended WIC Act

Reference	Scheme	Network operator licence
Aquacell Pty Ltd	1 Bligh Street	09_003
Narara Eco Village Co-operative Pty Ltd	Narara	17_040
Orica Australia Pty Ltd	Orica groundwater scheme	12_016
Veolia Water Solutions and Technologies (Australia) Pty Ltd	Darling Quarter	10_008

Source: IPART, [Licences under the Water Industry Competition Act 2006 – superseded from 1 March 2025](#).

^f The amended WIC Act licensing threshold is intended to exclude schemes that are small or low risk.

Table 2.2 There are 5 retail supplier licences no longer regulated under the amended WIC Act

Reference	Scheme	Retail supplier licence
Kooragang Water Pty Ltd	Kooragang Industrial Water Scheme	22_047R
Narara Eco Village Co-operative Pty Ltd	Narara	17_041R
Orica Australia Pty Ltd	Orica groundwater scheme	12_012R
Sydney Desalination Plant Pty Ltd	Sydney Desalination Plant	10_011R
Veolia Water Solutions and Technologies (Australia) Pty Ltd	Darling Quarter	10_009R

Source: IPART, [Licences under the Water Industry Competition Act 2006](#) – superseded from 1 March 2025.

2.1.3 We varied 4 licences

At the request of 2 WIC Act licensees, we made variations to 4 licences which transitioned under the new WIC Act licensing and approval framework during the transition process. These variations are summarised in Table 2.3 below.

Table 2.3 We varied 4 licences during the transition to the amended WIC Act

Licensee	Licence numbers	Variation
Aquacell Pty Ltd	25_008 25_009R	Increasing the licence capacity from 1 scheme to 10.
True Water Pty Ltd	25_019 25_020R	Change to agreements relied upon to provide technical and organisational capacity.

2.2 Approvals granted, varied or cancelled in 2024-25

2.2.1 We granted 2 approvals

We granted a scheme approval for Altogether's Huntlee scheme on 14 August 2024, followed by an operational approval on 23 September 2024. The Tribunal approved replacing both the scheme approval and operational approval for Huntlee to take effect on 16 June 2025 to address errors and misdescriptions in the original instruments.

Unlike the transition of other schemes under the amended WIC legislation which occurred on 1 March 2025, the scheme and operational approvals for Huntlee were issued during the transition period (1 March 2024 – 28 February 2025).¹⁶ This was done to resolve a pending application received prior to the amendment of the WIC legislation. The granting of the scheme and operational approvals expanded the area of operations to include previously excluded stranded lots, ensuring comprehensive service coverage for the Huntlee development.

2.2.2 We varied 2 approvals

During the transition period we varied 2 approvals. These variations are summarised in Table 2.4 below.

Table 2.4 We varied 2 approvals during the transition to the amended WIC Act

Scheme	Approval reference	Variation
Gundaroo	25_049OA	Frequency of monitoring designated irrigation areas.
Ashbourne	25_036SA	1. Adjust the bank guarantee amount annually to reflect the operating costs of the scheme. 2. Changed the irrigation areas for treated effluent

2.2.3 We cancelled no approvals

We did not cancel any scheme or operational approvals during the 2024-25 reporting period.

2.3 Approvals assessed but not completed in 2024-25

We received 2 applications during the 2024-25 reporting period. Both applications were granted approval after 30 June 2025.

coNEXA Projects and Operations Pty Ltd

coNEXA Projects and Operations (coNEXA) applied for an operator licence and a retailer licence in January 2025.¹⁷ This was the first licence application assessed under the new WIC Act licensing and approvals framework. The Minister approved both the operator licence and retailer licence for coNEXA in July 2025.

Aquacell Pty Ltd

Aquacell applied to vary its operator licence in June 2024. This was to account for future growth in the number and type of schemes it operates. Aquacell's recycled water scheme (1 Bligh Street) was not transitioned under the amended WIC legislation. Aquacell requested to vary their transitioned operator licence to allow them to continue to operate recycled water schemes under the WIC Act framework.

The Minister approved the following variations to Aquacell's operator licence⁹ in July 2025:

1. Addition of a new authorised class of water industry infrastructure.
Class: collection and treatment of sewage for the production, supply and use of recycled water.
Scale: 900 kilolitres per day (kL/day).

⁹ A copy of Aquacell's operator licence and retailer licence is published on our [website](#).

2. Increase in the maximum scale of schemes for an existing authorised class of water industry infrastructure under the licence.

Class: collection and treatment of sewage for disposal by irrigation.

Scale: from 200 kL/day to 900 kL/day.

No other licence or approval applications were assessed in the 2024-25 reporting period.

2.3.1 Applications to modify the deemed customer contract

The amended WIC Act introduced a deemed customer contract which applies to small retail customers of WIC Act licensees.¹⁸ The deemed customer contract ensures customers are provided with a standard level of service and customer protection. This is similar to the standard customer contracts of Sydney Water and Hunter Water.¹⁹

If a WIC Act licensee considers the deemed customer contract to not be suitable for a particular scheme, they can apply to IPART for either a modification to, or exclusion from, the deemed customer contract in the WIC Act.²⁰ A customer (or a representative) can also request a modification or exclusion from the deemed customer contract from the operator or retailer in writing.²¹

We have received an application from Altogether Group to modify the deemed customer contract for all its schemes. We granted a temporary exclusion from the deemed customer contract to Altogether Group while the application was assessed. The existing customer contracts for Altogether Group from before the deemed customer contract came into force have remained in place during the exclusion period. The application is currently under assessment by IPART.

3 Changes in the water industry and operating statistics

The WIC Act was introduced during the Millenium Drought to encourage private-sector investment and innovation in the supply of water and sewerage services.²² The WIC Act underwent a significant review and was recently amended to create a new regulatory framework for the private water industry. The new framework introduced state-wide operator and retailer licences, moving away from scheme-specific licences. The amended WIC Act also introduced new requirements for schemes determined to be an essential service by IPART, including the preparation of last resort arrangements.²³

We discuss the new WIC Act framework, as well as the current trends and operating statistics in the sections below.

3.1 Commencement of the amended WIC Act

The WIC Act was amended by the *Water Industry Competition Amendment Act 2021* to create a new regulatory framework for the private water industry. The amended WIC Act and the new WIC Regulation took effect on 1 March 2025 following a 12-month transition period. Figure 3.1 outlines the key changes under the new framework.

Figure 3.1 Key changes under the new WIC Act regulatory framework

State-wide operator and retailer licences



Operator and retailer licences are now state-wide, rather than scheme-specific. These licences are granted by the Minister.²⁴

- Licensed operators have the authority to construct and operate a specified number of schemes of a specified size and type.²⁵
- Licensed retailers are authorised to sell the provision of water and sewerage services to small retail customers.²⁶

Scheme and operational approvals



Each scheme has its own scheme and operational approvals issued under a WIC Act licence. These approvals are issued by IPART. A scheme approval specifies:

- area of operations
- infrastructure locations
- infrastructure class
- design capacity
- staging of the scheme.²⁷

Further approvals are required to commence operations once construction is completed (operational approval).

Last resort arrangements



The new framework provides for a Last Resort Provider (determined by the Minister) to step in and continue essential services should a WIC Act licensee fail.²⁸ This is discussed further in section 3.1.1.

Schemes which are determined as essential infrastructure by IPART are required to prepare a contingency plan to support last resort arrangements should the WIC Act licensee fail to provide a service.

Enhancing customer protection and service standards



The WIC Act established a deemed customer contract, which aligns with the standard customer contracts used by Sydney Water and Hunter Water.²⁹ Amongst other things, the deemed customer contract includes new requirements for WIC Act licensees to publish and notify customers of prices.

Increased oversight capabilities



The framework strengthens IPART's oversight capabilities by expanding its auditing and reporting functions and increasing its investigative powers and penalties for violations.³⁰

We have transitioned a total of 14 operator licences and 7 retailer licences to the amended WIC Act licensing and approvals framework (see Table 3.1 and Table 3.2). There was a total of 4 schemes which no longer required licensing under the new framework as these schemes did not meet the licensing threshold under the amended WIC Act.^h They are now regulated by local councils under the *Local Government Act 1993*, instead of the WIC Act.

Licensees may apply to be the registered operator of multiple schemes, up to the maximum scale and class permitted under their licence. We understand that upcoming amendments to the WIC legislation will enable the transfer of existing schemes between licences. While most licensees currently operate only one scheme per licence, we anticipate that, once the legislative changes take effect, licensees may begin consolidating multiple schemes under fewer licences.

Both licences and approvals can be amended to accommodate changes in schemes or infrastructure.³¹

^h The amended WIC Act licensing threshold is intended to exclude schemes that are small or low risk.

Table 3.1 There were 14 operator licences as at 30 June 2025

Licence	Licensee	Schemes	Status
25_001	Altogether Central Park Pty Ltd ^a	Central Park	Transitioned
25_002	Altogether Cooranbong Pty Ltd ^a	Cooranbong	Transitioned
25_003	Altogether Discovery Point Pty Ltd ^a	Discovery Point	Transitioned
24_005	Altogether Huntlee Pty Ltd ^a	Huntlee	Transitioned
25_006	Altogether Operations Pty Ltd ^a	Box Hill North Shepherds Bay Glossodia	Transitioned
25_007	Altogether Pitt Town Pty Ltd ^a	Pitt Town	Transitioned
25_008	Aquacell Pty Ltd	Kurrajong	Transitioned
25_011	Catherine Hill Bay Water Pty Ltd	Catherine Hill Bay	Transitioned
25_012	CPE Barangaroo Recycled Water Pty Ltd	Barangaroo	Transitioned
25_013	Kooragang Water Pty Ltd ^b	Kooragang Industrial Water Scheme (KIWS)	Transitioned
25_014	Kyeema Water Pty Ltd	Gundaroo	Transitioned
25_016	Rosehill Network Pty Ltd	Rosehill	Transitioned
25_018	Sydney Desalination Plant Pty Ltd ^b	Sydney Desalination Plant	Transitioned
25_019	True Water DTR Pty Ltd	Ashbourne	Transitioned
25_053	coNEXA Projects and Operations Pty Ltd ^c	Nil	New
Network operator licences no longer licensed under the WIC Act			
09_003	Aquacell Pty Ltd	1 Bligh Street	Not in force
17_040	Narara Ecovillage Co-operative Ltd	Narara	Not in force
12_016	Orica Australia Pty Ltd	Orica groundwater scheme	Not in force
10_008	Veolia Water Solutions and Technologies (Australia) Pty Ltd	Darling Quarter ^d	Not in force

Note: The operator licensees authorised to provide drinking water (other than Sydney Desalination Plant) resell drinking water sourced from Sydney Water and Hunter Water.

a. This licensee is a subsidiary company of Altogether Group Pty Ltd.

b. This licensee does not have an associated retailer licence.

c. The operator licence for coNEXA Projects and Operations Pty Ltd was granted 16 September 2025.

d. Also known as Darling Walk.

Source: IPART, [Licences and Schemes](#).

Table 3.2 There were 7 retailer licences as at 30 June 2025

Licence	Licensee	Scheme	Status
25_004R	Altogether Group Pty Ltd	Central Park Cooranbong Discovery Point Huntlee Box Hill North Shepherds Bay Glossodia Pitt Town	Transitioned
25_009R	Aquacell Pty Ltd	Kurrajong	Transitioned
25_010R	AquaNet Sydney Pty Ltd	Rosehill	Transitioned
25_050R	CPE Barangaroo Recycled Water Pty Ltd	Barangaroo	Transitioned
25_015R	Kyeema Water Pty Ltd	Gundaroo	Transitioned
25_017R	Solo Water Pty Ltd	Catherine Hill Bay	Transitioned

Licence	Licensee	Scheme	Status
25_020R	True Water DTR Pty Ltd	Ashbourne	Transitioned
25_054R	coNEXA Projects and Operations Pty Ltd ^a	Nil	New
Retail supplier licences no longer licensed under the WIC Act			
16_039R	Kooragang Water Pty Ltd	Kooragang	Not in force
17_041R	Narara Ecovillage Co-operative Ltd	Narara	Not in force
12_017R	Orica Australia Pty Ltd	Orica groundwater scheme	Not in force
10_011R	Sydney Desalination Plant Pty Ltd	Sydney Desalination Plant	Not in force
10_009R	Veolia Water Solutions and Technologies (Australia) Pty Ltd	Darling Quarter ^b	Not in force

a. The retailer licence for coNEXA Projects and Operations was granted 16 September 2025.

b. Also known as Darling Walk.

Source: IPART, [Licences and Schemes](#).

3.1.1 Essential service providers are required to prepare a contingency plan

The amended WIC Act introduced new requirements for licensees who operate schemes determined to be essential infrastructure by IPART.³² When IPART considers whether a scheme should be determined as essential infrastructure, we factor in:

- the potential impact on customers should the WIC Act licensee fail to continue to provide water or sewerage services
- whether alternative arrangements to replace failed services would be easily accessed and readily available
- whether it would be necessary to transfer customers to the provider of a replacement service if the WIC Act licensee should fail.³³

Schemes which are essential infrastructure are operated by essential service providers (ESPs) and will have a last resort provider (LRP) designated by the Minister. In a last resort event, where the Minister declares that an ESP has failed, the LRP will step-in to continue operations.

A designated LRP will either be a public water utility operating in the same area as the essential infrastructure or a licensee who has expressed interest and who satisfies the criteria set out in the WIC Regulation for LRPs.³⁴ Table 3.3 outlines the schemes determined to be essential infrastructure as well as the designated LRP.

Table 3.3 There are 13 schemes determined as essential infrastructure

Scheme	Registered Operator	Registered Retailer	Last resort provider
Gundaroo	Kyeema Water Pty Ltd	Kyeema Water Pty Ltd	Yass Valley Council
Cooranbong	Altogether Cooranbong Pty Ltd	Altogether Group Pty Ltd	Hunter Water Corporation
Catherine Hill Bay	Catherine Hill Bay Water Utility Pty Ltd	Solo Water Pty Ltd	Hunter Water Corporation
Huntlee	Altogether Huntlee Pty Ltd	Altogether Group Pty Ltd	Hunter Water Corporation
Kooragang Industrial Water Scheme	Kooragang Water Pty Ltd	N/A	Hunter Water Corporation
Barangaroo	CPE Barangaroo Recycled Water Pty Ltd	CPE Barangaroo Recycled Water Pty Ltd	Sydney Water Corporation

Scheme	Registered Operator	Registered Retailer	Last resort provider
Box Hill North	Altogether Operations Pty Ltd	Altogether Group Pty Ltd	Sydney Water Corporation
Central Park	Altogether Central Park Pty Ltd	Altogether Group Pty Ltd	Sydney Water Corporation
Discovery Point	Altogether Discovery Point Pty Ltd	Altogether Group Pty Ltd	Sydney Water Corporation
Glossodia ^a	Altogether Operations Pty Ltd	Altogether Group Pty Ltd	Sydney Water Corporation
Kurrajong	Aquacell Pty Ltd	Aquacell Pty Ltd	Sydney Water Corporation
Pitt Town	Altogether Pitt Town Pty Ltd	Altogether Group Pty Ltd	Sydney Water Corporation
Shepherds Bay	Altogether Operations Pty Ltd	Altogether Group Pty Ltd	Sydney Water Corporation

a. The Glossodia scheme is not currently in operation. Once it has been granted operational approval by IPART, Altogether Group Pty Ltd will have 6 months (or another date approved by IPART) to submit a contingency plan to IPART for approval.

A contingency plan must be submitted to and approved by IPART for each scheme determined to be essential infrastructure.³⁵ A contingency plan must set out information, required actions and arrangements necessary for a LRP to continue operations should the ESP fail.³⁶ The nominated provider preparing the contingency plan (either the ESP or LRP) is responsible for preparing and maintaining the currency of the contingency plan.

We provide a guide to preparing contingency plans and a template on our website.³⁷

The requirement to prepare and maintain a contingency plan for essential infrastructure schemes provides increased protections for customers. Previously, if a licensee was unable to continue to provide essential services for customers this may have resulted in customers having no access to safe and reliable services for prolonged periods of time.

We are in the process of reviewing, testing and considering submitted contingency plans for approval. The nominated provider for a scheme determined to be essential infrastructure is required to submit a contingency plan 6 months following operational approval, or by another date approved by IPART.³⁸ We have received 11 contingency plans and 1 ESP has been granted an extension to provide the contingency plan in November 2025. The nominated provider is either the ESP or LRP for a scheme.

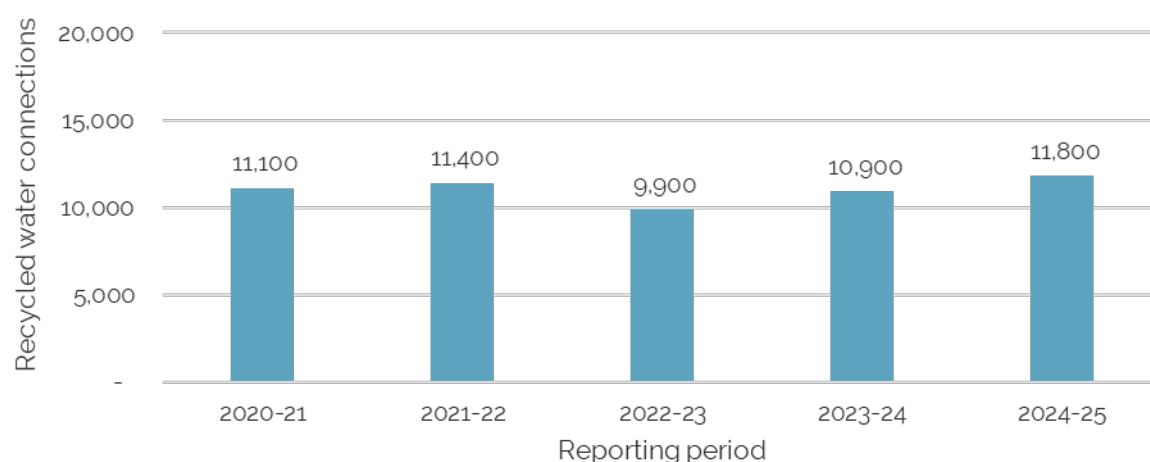
We intend to test contingency plans at the next compliance audit in 2025-26 for licensees unless we have agreed to a different arrangement with an ESP.

3.2 Operating statistics and emerging trends in the water industry

Water security and sustainable water management remain significant challenges for NSW. The NSW Government has established the *Greater Sydney Water Strategy* (GSWS) and the *Lower Hunter Water Security Plan* (LHWSP) to enhance sustainable and resilient water services in these regions. These plans aim to increase rainfall-independent water supply and recycled water use, effectively manage limited resources and maintain system resilience against climate change.

In the 2024-25 reporting period, there was an 8% increase in the number of customers connected to recycled water schemes licensed under the WIC Act (see Figure 3.2).

Figure 3.2 Recycled water connections have been stable since 2020-21



Note: The number of recycled water connections has been rounded to nearest multiple of 100.
Source: IPART analysis of annual compliance reports and performance statistics submitted by WIC Act licensees.

We received partial reporting for licences which are no longer in force as of 1 March 2025. These licensees provided performance indicator date for the period 1 July 2024 to 28 February 2025.

There was an 7% increase in the total volume of sewage collected in 2024-25 across WIC Act schemes. In previous years, Altogether Group reported the volume of sewage collected including any sewage discharged to third parties, such as Sydney Water. As of the 2024-25 reporting period, untreated sewage discharged to third parties has no longer been counted in Altogether Group's submitted licence data. To ensure we can show the true year-on-year change in volumes collected, Altogether Group provided their 2023-24 financial year data for sewage collected using the changed reporting method.ⁱ

We expect the number of connected recycled water and sewage customers to increase over the coming years as the competitive market and demand for private water schemes grows.

3.2.1 Increased focus on water balance and excess recycled water

We have been increasing our focus on water balance and excess recycled water. The management of excess recycled water can be a challenge for some recycled water schemes where the production of recycled water may exceed the demand for recycled water at the end use point.

Additionally, extreme weather conditions, including heavy rainfall, can elevate the challenges of managing excess recycled water. Demand for recycled water for outdoor use reduces during periods of wet weather. For schemes reliant on irrigation and disposal to land, long periods of rain can saturate soils which may reduce capacity for sustainable irrigation practices and impact the water balance in designated irrigation zones.

ⁱ For 2023-24, Altogether Group reported the total volume of sewage collected as 1,409 ML. The adjusted total (excluding sewage discharged to third parties) is 923.7 ML.

Public water utilities tend to have a greater capacity to deal with unplanned increases in sewage and recycled water production and reduced demand as they operate larger networks and more extensive systems. As the treatment plants are generally larger, they often have a greater storage and treatment capacity, allowing them to store and treat greater volumes of water. Excess recycled water can also be disposed of along with treated sewage at discharge sites under Environment Protection Licences issued by the Environment Protection Authority.

Some WIC Act schemes have implemented anticipatory solutions to address excess recycled water entering the system, such as maintaining a pipeline to deliver excess recycled water to a council sewage treatment plant for disposal. Alternative options such as increasing storage volumes can be costly for licensees to construct and maintain, with many relying on irrigation and disposal to land.

We will be focusing on licensee's management of excess recycled water in compliance audits for the 2025-2030 compliance audit period.

3.2.2 Impact of the new WIC Act on the development of new schemes

We expect further demand for schemes developed under WIC Act licences and approvals. The rapid growth of large housing developments, industrial schemes and data centres has placed pressure on public water utilities to meet service demands. While we have not formally received applications under the WIC Act, we have engaged with potential and current WIC Act licensees who are considering opportunities to meet growing infrastructure demands across NSW.

The amended WIC Act introduced new considerations for IPART when approving an area of operations for a new scheme. IPART must be satisfied that the area of operation is appropriate, including whether the scheme is likely to be capable of supplying water supply or sewerage services to all premises within the proposed area of operations within a reasonable period. IPART may also consider whether the area of operations unreasonably excludes premises within or near the boundary of the proposed area of operations.

This provides increased visibility of current and future service demands in the proximity of a new scheme and an incentive for scheme proponents to consider the current or future servicing needs of nearby landholders when planning and designing their schemes.

3.2.3 Action in the water industry on PFAS levels

The contamination of perfluoroalkyl and polyfluoroalkyl substances (PFAS) in drinking water has caught global media attention. In Australia, the presence of PFAS in drinking water is regulated through the requirement to maintain a quality assurance program under the *Public Health Regulation 2022*³⁹ and the Australian Drinking Water Guidelines (ADWG).⁴⁰ However, recent investigation into elevated PFAS levels in 3 regional towns, as well as the Blue Mountains region of NSW, resulted in calls for increased regulation of PFAS in Australia.^{41, 42}

The ADWG has recently been reviewed and updated by the National Health and Medical Research Council (NHRMC).⁴³ The revised guidelines have introduced lower tolerance levels for PFAS in Australian drinking water. Recent testing of drinking water suppliers in NSW found that all suppliers complied with the new PFAS tolerance levels under the ADWG.⁴⁴

Public water utilities in NSW are required to publish PFAS monitoring results under their operating licence. Additionally, Sydney Water publishes PFAS monitoring results on behalf of the Sydney Desalination Plant (SDP) who is a WIC Act licensee.⁴⁵ SDP supplies bulk drinking water to Sydney Water and at full capacity can service up to 15% of Greater Sydney's total drinking water.⁴⁶

3.2.4 Impact of price increases on WIC Act licensees

In most parts of NSW customers have no choice about who supplies their water. IPART's role is to independently set prices for water services to reflect the efficient cost of providing services to ensure fair prices for customers. We set the prices charged by:

- Sydney Water
- Sydney Desalination Plant^j
- Hunter Water
- Central Coast Council
- Essential Energy (for Broken Hill)
- Water NSW
- Water Administration Ministerial Corporation.

WIC Act licensees, other than Sydney Desalination Plant, set their standard and additional contract charges and other prices independently. Some WIC Act licensees may purchase treated drinking water from a public water utility to top-up other services they provide (e.g. to meet the supply demands of recycled water) or to resell as drinking water to its customers within a scheme.

Licensees that purchase wholesale drinking water are impacted by price increases resulting from IPART determinations. These price increases are ultimately passed onto the end-use customers for a WIC Act scheme.

^j Sydney Desalination Plant (SDP) is licensed under the WIC Act. SDP supplies bulk drinking water to Sydney Water and at full capacity can service up to 15% of Greater Sydney's total drinking water.

4 IPART's role in monitoring licence compliance

WIC Act licensees are responsible for complying with the conditions of their licence and other obligations under the WIC Act and WIC Regulation. We aim to ensure the provision of safe, reliable water and sewerage services to customers of WIC Act licensees through the monitoring and reporting on the extent of their compliance with these obligations.

We achieve that aim by holding licensees accountable for their compliance performance and encouraging a culture of full compliance. We also seek to encourage compliance by:

- educating and informing licensees
- facilitating engagement between licensees and other stakeholders or regulators
- engaging directly with licensees on issues of concern.

The Minister or IPART may take enforcement action against any licensee that fails to comply with its obligations.⁴⁷ Such enforcement action may include imposing a monetary penalty or requiring the licensee to take certain actions. Recent amendments to the WIC Act have expanded the actions IPART and the Minister may take in response to a contravention of the Act or regulations.⁴⁸

4.1 Risk-based approach to monitoring compliance

Our approach includes a range of proactive and responsive measures such as:

- a risk-based independent audit program^k
- requiring licensees to immediately report incidents^l
- investigating incidents, complaints or inadequacies identified through audits or other means
- requiring licensees to submit annual compliance reports, including:
 - non-compliance exception reporting (i.e. requiring the licensee to report only non-compliances, instead of reporting against all licence conditions)
 - declarations for maintaining financial capacity and adequate insurance.
- proactive engagement with other regulators.

We aim to keep regulated entities accountable in accordance with their regulatory requirements. Compliance is the responsibility of the regulated entities, and we encourage licensees to strengthen their compliance culture.

^k We focus on licence conditions which seek to manage the biggest risks to safety, public health, customers, consumers and the environment and on licensees with poor records of compliance. We also reduce the audit frequency for licensees who demonstrate good compliance.

^l An incident reported by a WIC Act licensee does not necessarily indicate they are not compliant with their licence obligations.

4.1.1 We oversee an independent audit program

In our compliance monitoring and enforcement role, we continued to hold WIC Act licensees accountable for their compliance performance using a risk-based auditing regime and enforcement actions where appropriate.

Our primary objective is to ensure safe, reliable water and sewerage services. We do this by fostering a strong compliance culture within the regulated entities. We are mindful of this objective when deciding how to address instances of non-compliance. A high level of compliance supports the WIC Act's dual objectives of competition and development of the recycled water market by ensuring that market participants (WIC Act licensees and public water utilities) can compete on a level playing field, and the community feels confident in using recycled water for non-drinking purposes.^m

We conduct audits of licence conditions and assess whether licensed schemes are constructed, operated and maintained in a manner that effectively manages the risks to public health, the environment and consumers.

Compliance audits

We test licensees' compliance with the WIC Act, the WIC Regulation and their licence conditions through periodic, risk-based operational audits.ⁿ We initiate an audit and the licensee selects independent auditors from the [IPART WIC Act Audit Services and Technical Experts Panel](#) (panel) that we pre-approve to undertake audits.

Application audits

IPART must be satisfied that the infrastructure, plans and systems are fit for purpose before granting operational approval for a scheme.⁴⁹ We may require a scheme and related infrastructure to be audited to inform our decision on whether to grant the approval. These audits will determine whether the infrastructure:

- is safe to operate
- has been substantially constructed as authorised by the scheme approval
- complies with all licensing and legislative requirements.

Contingency plan testing audits

These audits review the adequacy of a licensee's contingency plan for a scheme which has been determined by IPART to be essential infrastructure. IPART may require a contingency plan to be tested by a technical expert appointed to our panel.

^m The long title of the WIC Act is *An Act to encourage competition in relation to the supply of water and the provision of sewerage services and to facilitate the development of infrastructure for the production and reticulation of recycled water, and for other purposes.*

ⁿ For more information refer to our [Audit Guidelines](#).

4.1.2 Licensees are required to report incidents immediately

We continue to proactively monitor and enforce WIC Act licensees' compliance with their licence conditions. We expect licensees to be proactive in identifying potential problems and to work with us to resolve issues and minimise any risks posed by their activities.

WIC Act licensees must immediately report to IPART incidents that occur in the conduct of their activities that threaten, or could threaten, water quality, public health or safety, in accordance with the relevant reporting manual.⁵⁰ An incident reported by a licensee does not necessarily indicate they are not compliant with their licence obligations.

This year, we received 11 immediate incident reports from licensees.

We are reviewing 2 of the reported incidents as potential licence non-compliances that may require further action.

4.1.3 Licensees submit an annual compliance report to IPART

In addition to immediate incident reporting, WIC Act licensees are required to submit an annual compliance report to IPART by 1 September each year in accordance with our WIC Act reporting manual.⁵¹ Each licensee's annual compliance report is to include information on any non-compliance with its licence conditions, and declarations for maintaining financial capacity and adequate insurance.

Licensees must declare that they have maintained insurance arrangements appropriate for the nature and size of the activities under their licence and provide certificates of currency for key insurances and details of material changes made during the year.⁵² Licensees that provide small retail customers with essential services (drinking water or sewage services) must also include a statement of financial capacity.

Licensees are also required to immediately report all non-compliances that could potentially have a serious impact on water quality, continuity of supply, public health, safety, other licensees or the Government's policy objectives.⁵³

For 2024-25 reporting, we asked licensees to report on their licence activities in 2 separate reports because the amended WIC Act came into effect part way through the financial year. However, we have consolidated reported data for the performance indicators for the entire financial year (see Appendix B and C).

4.1.4 We engage with other regulators and stakeholders to support best practice

We work closely with NSW Health, seeking advice on matters that may affect public health and facilitating NSW Health's input on key audits, risk assessments undertaken by licensees and for their licence plans.

As required, we also coordinate with other regulators where our licensing or compliance monitoring function identifies issues related to their area of expertise or responsibility. This includes:

- NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)
- NSW Fair Trading and the Building Commission NSW
- SafeWork NSW
- Fire and Rescue NSW
- NSW Environment Protection Authority
- Local councils.

4.1.5 We updated our audit guidelines

We updated our [audit guidelines](#) in July 2025 to align with the new requirements in the WIC Act for licensees. This included updates to our:

- Audit Guidelines – Fundamentals, process and findings
- Audit Guidelines – Application audits
- Audit Guidelines – Compliance audits
- Audit Guidelines – Contingency plan audits.

We have not updated the WIC Act audit grades in our audit guidelines. Table 4.1 outlines these compliance grades.

Table 4.1 WIC Act compliance audit grades

Grades of compliance	Description
Compliant 	Sufficient evidence is available to confirm that the requirements have been met.
Non-compliant (non-material) 	Sufficient evidence is not available to confirm that the requirements have been met. The deficiency: • poses an inherently minimal risk to public health, water quality, customer wellbeing, or environment, or • poses a minimal risk to public health, water quality, customers wellbeing, or environment as the licensee had appropriate controls in place during the audit period.
Non-compliant (material) 	Sufficient evidence is not available to confirm the requirements have been met. The deficiency poses a medium/high risk to public health, water quality, customer wellbeing, or environment, even with controls in place.
No requirement 	There is no requirement for the licensee to meet this criterion within the audit period.

Note: The WIC Act audit grades detailed above apply to the 4 IPART audit guidelines.

Source: IPART, [Audit Guidelines – Water Industry Competition Act – Compliance audits](#), July 2025, p 6.

Where relevant, we repeat an audit of any licence conditions where a licensee was previously found to be non-compliant to check that the licensee has rectified the non-compliances. For high-risk non-compliances, we may require a repeated audit of the relevant obligations and/or immediate action.

Audit findings inform our decisions on matters of compliance with a WIC Act licensee's legislative obligations. However, we may consider a range of information before deciding whether we are satisfied that a non-compliance has occurred and the materiality of the non-compliance. We may reach a different conclusion from an auditor on the matter of compliance or materiality.

Appendices

A Audits undertaken in 2024-25

Table A.1 There were 13 compliance audits against network operator licences for the 2024-25 reporting period

Licensee	Scheme	Audit period	Date of final report
Altogether Central Park Pty Ltd	Central Park	1 Feb 2024 – 31 Jan 2025	31 March 2025
Altogether Cooranbong Pty Ltd	Cooranbong	1 Feb 2024 – 31 Jan 2025	31 March 2025
Altogether Discovery Point Pty Ltd	Discovery Point	1 Feb 2024 – 31 Jan 2025	31 March 2025
Altogether Huntlee Pty Ltd	Huntlee	1 Feb 2024 – 31 Jan 2025	31 March 2025
Altogether Operations Pty Ltd	Box Hill Glossodia Shepherds Bay	1 Feb 2024 – 31 Jan 2025	31 March 2025
Altogether Pitt Town Pty Ltd	Pitt Town	1 Feb 2024 – 31 Jan 2025	31 March 2025
Aquacell Pty Ltd	Kurrajong Bligh Street ^a	1 Jul 2023 – 30 Oct 2024	14 February 2025
Kyeema Water Pty Ltd	Gundaroo	1 Oct 2023 – 30 Sep 2024	15 January 2025
Sydney Desalination Plant Pty Ltd	Sydney Desalination Plant	19 Sep 2022 – 27 Sep 2024	17 December 2024
True Water Pty Ltd ^b	Ashbourne	N/A	14 July 2025
Rosehill Network Pty Ltd	Rosehill	1 Oct 2022 – 31 Jan 2025	14 May 2025
Veolia Water Solutions & Technologies (Australia) Pty Ltd	Darling Quarter ^a	1 Jan 2023 – 20 Nov 2024	27 March 2025

a. This scheme did not transition under the new WIC Act licensing and approvals framework.

b. We completed a pre-operation licence audit of True Water Pty Ltd as they do not currently have a scheme in operation under the WIC Act.

Source: IPART analysis.

B Annual operating performance statistics—operator licensees

Below we provide the annual operating performance statistics for operator licences granted under the WIC Act. The legend for these tables can be found in Table B.3.

Table B.1 Operating performance statistics—operator licences (in force)

Licence	Licensee	A1	A2	A3	A4	A10	A11	A12
25_001	Altogether Central Park Operator Licence	0	0	0	0	0	0	0
25_002	Altogether Cooranbong Operator Licence	0	0	1	75	702	0	0
25_003	Altogether Discovery Point Operator Licence	0	0	0	0	0	0	0
24_005	Altogether Huntlee Operator Licence	0	0	1	105	1,545	1	0
25_006	Altogether Operations Operator Licence	0	0	0	0	0	3	0
25_007	Altogether Pitt Town Operator Licence	0	0	0	0	0	0	0
25_008	Aquacell Operator Licence	0	0	0	0	0	0	0
25_011	Catherine Hill Bay Operator Licence	0	0	0	0	0	1	0
25_012	CPE Barangaroo Operator Licence	0	0	0	0	0	0	0
25_013	Kooragang Network Operator Licence	0	0	0	0	0	0	0
25_014	Kyeema Water Operator Licence	0	0	0	0	0	0	0
25_016	Rosehill Network Operator Licence	0	0	0	0	0	0	0
25_018	Sydney Desalination Plant Operator Licence	0	0	0	0	0	0	0
25_019	True Water Operator Licence	0	0	0	0	0	0	0
Total		0	0	2	180	2,247	5	0

Source: IPART analysis of annual performance statistics submitted by WIC Act licensees.

Table B.2 Operating performance statistics—network operator licences (not transitioned)

Licence	Scheme	A1	A2	A3	A4	A10	A11	A12
09_003	1 Bligh St	0	0	0	0	0	0	0
10_008	Darling Walk	0	0	0	0	0	0	0
12_016	Orica	3	3	0	0	0	0	0
17_040	Narara	0	0	0	0	0	0	0
Total		3	3	0	0	0	0	0

Source: IPART analysis of annual performance statistics submitted by WIC Act licensees.

Table B.3 Legend: Performance indicators—operator licensees

A1	Number of properties that experience an unplanned water interruption that lasts for more than five continuous hours in the financial year.
A2	Number of properties that experience three or more water interruptions that each lasts for more than one hour in the financial year.
A3	The total number of unplanned interruptions where customers are without potable water supply, during the reporting year (interruptions).
A4	The average duration for which a customer is without potable water, due to an unplanned supply interruption during the reporting year (minutes).
A10	Number of properties that experience a water pressure failure in the financial year.
A11	Number of properties (other than public properties) that experience an uncontrolled wastewater overflow in dry weather in the financial year.
A12	Number of properties (other than public properties) that experience three or more uncontrolled wastewater overflows in dry weather in the financial year.

C Annual operating performance statistics —retailer licensees

Below we provide the annual operating performance statistics for retailer licences granted under the WIC Act. The legend for these tables can be found in Table C.3.

Table C.1 Operating performance statistics—retailer licences (in force)

Licence	Licensee	ML			'000					
		L1	L2	L3	L4	L5	L6	L7	L8	L9
24_004R	Altogether Group Retail	1902	1044	1028	7.8	0.1	10.2	0.1	10.2	0.05
25_009R	Aquacell Retailer Licence	20.027	10.145	20.803	0	0	0.033	0.001	0	0.001
25_010R	AquaNet Retailer Licence	1,573.47	1,327.21	0	0	0	0	0	0	0.01
25_015R	Kyeema Water Retailer Licence	0	0	3.165	0	0	0.026	0	0	0
25_017R	Solo Water Retailer Licence	97.89	40.36	63.92	0.462	0	0.445	0	0.445	0
25_020R	True Water Retailer Licence	0	0	0	0	0	0	0	0	0
25_050R	CPE Barangaroo Retailer Licence	120	120	306	0	0	1.086	0.019	1.01	0.018
Total^a		3,713	2,542	1,422	8,262	100	11,790	120	11,655	79

a. Totals have been rounded to nearest whole number.

Source: IPART analysis of annual performance statistics submitted by WIC Act licensees.

Table C.2 Operating performance statistics—retail supplier licences (not transitioned)

Licence	Scheme	ML			'000					
		L1	L2	L3	L4	L5	L6	L7	L8	L9
10_009R	Darling Walk	31.65	17.33	36.32	0	0	0	0	0	0
10_011R	Sydney Desalination Plant	0	0	0	0	0	0	0	0	0
12_017R	Orica	374.074	374.074	0	0	0	0	0	0	0.003
17_041R	Narara	9.5	3.6	6.8	0.059	0.003	0.059	0.003	0.059	0.003
22_047R	Kooragang Water	3,265.355	2,702.7	0	0	0.001	0	0	0	0.002
Total^a		3,307	2,724	43	59	4	59	3	59	8

a. Totals have been rounded to nearest whole number.

Source: IPART analysis of annual performance statistics submitted by WIC Act licensees.

Table C.3 Legend: Performance indicators—retailer licensees

L1	Total volume of water supplied (ML)	The total volume of drinking and non-potable water supplied, including for environmental flows and bulk water exports in the financial year.
L2	Total volume of non-potable water supplied (ML)	The total volume of non-potable water supplied by the utility during the reporting year, in megalitres (ML).
L3	Total volume of wastewater collected (ML)	The total volume of wastewater collected by the utility during the reporting year, in megalitres (ML).
L4	Connected residential properties – water supply (000s)	The number of connected residential properties receiving water supply services from the utility during the reporting year (properties 000s).
L5	Connected non-residential properties – water supply (000s)	The number of connected non-residential properties receiving water supply services from the utility during the reporting year (properties 000s).
L6	Connected residential properties – wastewater (000s)	The number of connected residential properties receiving wastewater services from the utility during the reporting year (properties 000s).
L7	Connected non-residential properties – wastewater (000s)	The number of connected non-residential properties receiving wastewater services from the utility during the reporting year (properties 000s).
L8	Connected residential properties – recycled water supply (000s)	The number of connected residential properties receiving recycled water services from the utility during the reporting year (properties 000s).
L9	Connected non-residential properties – recycled water supply (000s)	The number of connected non-residential properties receiving recycled water services from the utility during the reporting year (properties 000s).

Glossary

Reference	Definition
Altogether/Altogether Group	Altogether Group Pty Ltd
Amended WIC Act	The WIC Act as in force following the commencement of the <i>Water Industry Competition (Amendment) Act 2021</i> .
Aquacell	Aquacell Pty Ltd
Barangaroo	CPE Recycled Water (Barangaroo South) Pty Ltd
Box Hill	Box Hill scheme (licensed to Altogether Operations Pty Ltd)
Catherine Hill Bay/ CHBWU	Catherine Hill Bay Water Utilities Pty Ltd
Central Park	Altogether Central Park Pty Ltd
coNEXA	coNEXA Projects and Operations Pty Ltd
Cooranbong	Altogether Cooranbong Pty Ltd
DCCEEW	Department of Climate Change, Energy, the Environment and Water (formerly Department of Planning and Environment)
Discovery Point	Altogether Discovery Point Pty Ltd
Essential service provider (ESP)	An essential service provider is a WIC Act licensee which operates a scheme determined to be essential infrastructure by IPART.
Former WIC Act	The WIC Act as in force before the commencement of the <i>Water Industry Competition (Amendment) Act 2021</i> .
Glossodia	Glossodia scheme (licensed to Altogether Operations Pty Ltd)
Huntlee	Altogether Huntlee Pty Ltd
IPART	Independent Pricing and Regulatory Tribunal
Kooragang/KIWS	Kooragang Industrial Water Scheme
Kyeema	Kyeema Water Pty Ltd (formerly Kyeema Wastewater Pty Ltd)
Last resort provider (LRP)	A last resort provider is a public water utility, council or WIC Act licensee which has been designated by the Minister to continue operations of a scheme determined to be essential infrastructure in a last resort event.
Minister	Minister for Water
ML	Megalitres
Narara	Narara Ecovillage Co-operative Ltd
Network operator licence	Operational licences used under the former WIC Act. A network operator licence set out a licensee's obligations to operate a WIC Act scheme. These licences are no longer in force as of 1 March 2025.
Operational approval	Scheme-specific operational approvals granted by IPART. An operational approval is granted after the construction of a scheme and approves a WIC Act licensee to start operations. A WIC Act licensee cannot retail services for a scheme without being granted operational approval. Each scheme has its own operational approval.
Operator licence	State-wide operational licences granted by the Minister. Licensed operators have the authority to construct and operate a determined number of schemes of a specified size and type. These licences are granted from 1 March 2025 onwards.
Panel	WIC Act Audit Services and Technical Experts Panel
Pitt Town	Altogether Pitt Town Pty Ltd
Retail supplier licence	Retail licences used under the former WIC Act. A retail supplier licence set out a licensee's obligations to sell services in a WIC Act scheme. These licences are no longer in force as of 1 March 2025.

Reference	Definition
Retailer licence	State-wide retail licences granted by the Minister. Licensed retailers are authorised to sell the provision of water and sewerage services to small retail customers. These licences are granted from 1 March 2025 onwards.
Rosehill Network	Rosehill Network Pty Ltd
Scheme approval	Scheme-specific approvals granted by IPART. A scheme approval is granted before the construction of a scheme and specifies the size, type and area of operations for a scheme. Each scheme has its own scheme approval.
Shepherds Bay	Shepherds Bay scheme (licensed to Altogether Operations Pty Ltd)
SMP	Sewage Management Plan
Solo Water	Solo Water Pty Ltd
SDP	Sydney Desalination Plant Pty Ltd
VWST	Veolia Water Solutions and Technologies (Australia) Pty Ltd
WIC Act	<i>Water Industry Competition Act 2006 (NSW)</i>
WIC Regulation	<i>Water Industry Competition (General) Regulation 2024 (NSW)</i>
WQP	Water Quality Plan

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- ¹ *Water Industry Competition Act 2006* (NSW), s 7K and 8M.
- ² *Water Industry Competition Act 2006* (NSW), pt 7A.
- ³ *Water Industry Competition Act 2006* (NSW), s 46AB.
- ⁴ Sydney Water Corporation, [Customer Contract 2024-28](#); and Hunter Water Corporation, [Customer Contract 2022-2027](#).
- ⁵ *Water Industry Competition (General) Regulation 2021* (repealed), sch 1 s 7(4)(a).
- ⁶ *Water Industry Competition (General) Regulation 2021* (repealed), sch 1 s 14(3)(a).
- ⁷ Sydney Desalination Plant submission to IPART's draft report for review of prices for Sydney Water Corporation, 23 June 2025, p 1.
- ⁸ *Water Industry Competition Act 2006* (NSW), s 6A(1)(b).
- ⁹ IPART, [WIC Act Network Operator's Reporting Manual and Retail Suppliers Reporting Manual](#), April 2022, p 6.
- ¹⁰ IPART, [Reporting Manual - Licensed Operators and Retailers under the WIC Act 2006](#), March 2025, p 6.
- ¹¹ *Water Industry Competition Act 2006* (NSW), s 46AC.
- ¹² IPART, [Publication and notification of prices – WICA utilities](#), 2025, accessed 27 September 2025.
- ¹³ *Water Industry Competition Act 2006* (NSW), s 7H.
- ¹⁴ *Water Industry Competition Act 2006* (NSW), s 8H and 8I.
- ¹⁵ *Water Industry Competition Act 2006* (NSW), s 7C and 7D.
- ¹⁶ *Water Industry Competition Act 2006* (NSW), sch 4 s 10.
- ¹⁷ IPART [coNEXA Operator and Retailer Licence application](#), accessed 29 October 2025.
- ¹⁸ *Water Industry Competition Act 2006* (NSW), pt 5 s 46AB.
- ¹⁹ Sydney Water Corporation, [Customer Contract 2024-28](#) and; Hunter Water Corporation, [Customer Contract 2022-2027](#).
- ²⁰ *Water Industry Competition (General) Regulation 2024*, pt 3 s 21.
- ²¹ *Water Industry Competition (General) Regulation 2024*, sch 4 pt 1 s 3(1).
- ²² NSW Department of Climate Change, Energy, the Environment and Water, [Water Industry Competition Act 2006](#), 1 March 2024, accessed 27 October 2025.
- ²³ *Water Industry Competition Act 2006* (NSW), pt 5A.
- ²⁴ *Water Industry Competition Act 2006* (NSW), s 8 and 8A.
- ²⁵ *Water Industry Competition Act 2006* (NSW), s 8E.
- ²⁶ *Water Industry Competition Act 2006* (NSW), s 8F.
- ²⁷ *Water Industry Competition Act 2006* (NSW), s 7C.
- ²⁸ *Water Industry Competition Act 2006* (NSW), s 55A.
- ²⁹ *Water Industry Competition Act 2006* (NSW), s 46AB.
- ³⁰ *Water Industry Competition Act 2006* (NSW), pt 7A.
- ³¹ *Water Industry Competition Act 2006* (NSW), s 7K and 8M.
- ³² *Water Industry Competition Act 2006* (NSW), pt 5A s 54(1).
- ³³ *Water Industry Competition Act 2006* (NSW), pt 5A s 54(1).
- ³⁴ *Water Industry Competition Act 2006* (NSW), pt 5A s 55(3).
- ³⁵ *Water Industry Competition (General) Regulation 2024*, pt 5 div 3 s 38.
- ³⁶ *Water Industry Competition (General) Regulation 2024*, pt 5 div 3 s 39.
- ³⁷ IPART, [Last resort arrangements](#).
- ³⁸ *Water Industry Competition (General) Regulation 2024*, pt 5 div 3 s 38(1).
- ³⁹ *Public Health Regulation 2022* (NSW), pt 5 s 45.
- ⁴⁰ National Health and Medical Research Centre, [Australian Drinking Water Guidelines](#), June 2025, p 220.
- ⁴¹ Xanthe Gregory, [PFAS contamination testing blitz in NSW sparks calls for further investigations](#), Australian Broadcasting Corporation, 3 February 2025, accessed 24 September 2025.
- ⁴² Donna Lu, [Water quality expert calls for wider PFAS ban as NSW community seeks blood tests on 'poisoned' land](#), The Guardian, 22 January 2025, accessed 24 September 2025.
- ⁴³ National Health and Medical Research Centre, [Australian Drinking Water Guidelines](#), accessed 24 September 2025.
- ⁴⁴ NSW Health, [Per- and polyfluoroalkyl substances \(PFAS\)](#), accessed 24 September 2025.
- ⁴⁵ Sydney Water, [PFAS monitoring results](#), accessed 24 September 2025.
- ⁴⁶ Sydney Desalination Plant, [Sydney Desalination Plant](#), accessed 23 October 2025.
- ⁴⁷ *Water Industry Competition Act 2006* (NSW), pt 2 div 6.
- ⁴⁸ *Water Industry Competition Act 2006* (NSW), pt 2 div 6.
- ⁴⁹ *Water Industry Competition Act 2006* (NSW), s 7C.
- ⁵⁰ IPART, [Reporting Manual - Licensed Operators and Retailers under the WIC Act 2006](#), March 2025, p 6.
- ⁵¹ IPART, [Reporting Manual - Licensed Operators and Retailers under the WIC Act 2006](#), March 2025, p 7.
- ⁵² IPART, [Reporting Manual - Licensed Operators and Retailers under the WIC Act 2006](#), March 2025, p 7.
- ⁵³ IPART, [Reporting Manual - Licensed Operators and Retailers under the WIC Act 2006](#), March 2025, p 6.