

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

Dear Mr O'Neill

I refer to your request for comments on an application by Narara Ecovillage Co-operative for a new development in Narara under the *Water Industry Competition Act 2006*. Narara Ecovillage Co-operative (NEV) has requested a new network operator licence to develop drinking water, recycled water and sewerage infrastructure. NEV has also applied for retail licence to provide drinking water retail services, recycled water retail services and sewerage services.

Based on the information provided NSW Health does not consider the drinking water scheme will pose any unacceptable risks and notes that it is the proponent's responsibility as the water supplier to ensure that all potential public health risks are adequately managed.

NSW Health supports the application provided that the matters raised below are addressed and NSW Health is consulted by IPART during the detailed risk assessments for drinking and recycled water, technology assessments and the development of management plans for drinking and recycled water. I request NSW Health is also consulted following the final compliance audit and before retail supply commences to ensure that all relevant public health matters have been considered. NSW Health also requests that NEV develop an *Incident Notification Protocol* for incidents including, but not limited to, water quality issues, treatment plant critical control point limit exceedances, algae, recycled water issues, cross connections, and contact details of all stakeholders involved in this scheme. At this stage of the application, NSW Health does not request any specific licence conditions.

The treatment trains for drinking water and recycled water have been inconsistently described. The claimed Log Reduction Value (LRV) achieved by the MBR is also based on clean water testing. The applicant needs to ensure the proposed treatment trains will meet the target quality for the proposed end-uses and are appropriately validated in accordance with the *Australian Drinking Water Guidelines* and *Australian Guidelines for Water Recycling*.

There is confusion in the application regarding who will be responsible for operating the water and wastewater treatment plants. Initially the application stated NEV will be responsible for operation though later the application states Aquacell will be responsible for operation. There is also confusion regarding the regulation and guidelines for plumbing and reticulation. The applicant must ensure that all plumbing and reticulation is designed, constructed, installed and maintained in accordance with the Plumbing Code of Australia.

NSW Health

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NSW Health advises that verification monitoring of both the drinking water and recycled water systems is required at a frequency recommended by the *Australian Drinking Water Guidelines* 2011 and the *Australian Guidelines for Water Recycling: Managing Health and Environmental Risks* 2006. NEV's Water Quality Policy states drinking water quality monitoring will be conducted independently by NSW Health. NSW Health has previously advised the applicant that this is incorrect. The NSW Drinking Water Monitoring Program is for public water utilities. NEV can develop their monitoring program in consultation with NSW Health but NEV must conduct their own verification monitoring using a NATA accredited laboratory. NSW Health can provide access to NSW Health's Database for NEV's laboratory to upload results and for Narara to view and report results. The Public Health Unit and NEV should be notified immediately of any verification results that are outside of *Australian Drinking Water Guidelines* or *Australian Guidelines for Water Recycling* values and in accordance with NSW Health protocols.

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

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

Thank you for the opportunity to make a submission. Should officers of IPART require further information, please contact Dr Katrina Wall, A/Manager Water Unit on [REDACTED]. Should the applicant require further information they may contact Kerry Spratt, Environmental Health Officer, Central Coast Public Health Unit on [REDACTED].

Yours sincerely

[REDACTED]

Dr Ben Scalley
Director Environmental Health Branch

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