

Ms Liz Livingstone
Chief Executive Officer
IPART NSW
PO Box K35
HAYMARKET POST SHOP NSW 1240

Your ref D20/24403

Our ref M20/15136

Dear Ms Liz Livingstone

I refer to your request for a submission on an application by Aquacell Pty Ltd for a network operator's licence at Kurrajong and a variation to their existing retail supplier's licence.

The application is to provide sewerage services to 35 residential lots with on-site sewage treatment and effluent disposal. NSW Health understands that the effluent irrigation area will be sign posted, fenced and there will be no above ground use of effluent. NSW Health notes that Aquacell is not seeking a licence for drinking water supply.

NSW Health has concerns regarding the applicant's application, understanding of the relevant guidelines and outcomes of the risk assessment. The intended end use, final water quality and the extent of any public exposure is unclear due to the application of various guidelines. The Wastewater Management Plan (Appendix C) states the *Australian Guidelines for Water Recycling* (AGWR) have overarching applicability to design of sewerage management schemes. The AGWR apply to the management of sewage for reuse not the design of sewerage infrastructure. Elsewhere wastewater management and effluent disposal guidelines are applied. Although the Plan includes water quality objectives from the AGWR, the preventive risk management framework including the setting of target log reduction values (LRV) of pathogens in the wastewater detailed in the Risk Assessment Summary Paper (Appendix C) has not been incorporated. The Plan does not include details of the sewage treatment process described in the risk assessment summary paper (Appendix C). The sewage treatment process is critical to manage the risks public health.

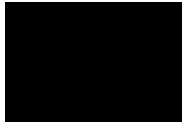
NSW Health was included, as requested, in the risk assessment held in March 2020 but has concerns with some of the outcomes. The total minimum log reduction values proposed for each barrier in the risk assessment summary are higher than expected. It is unclear that the proposed operating parameters for the barriers are adequate to achieve the level of pathogen control proposed. The ultraviolet disinfection system was not included as a critical control point despite being proposed as a necessary barrier for pathogen control.

I request, as noted previously, that NSW Health is consulted during the development of management plans and development of incident notification 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 management plans and compliance with relevant guidelines.

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 (02) 9391 9939. Should the applicant require further information they may contact Mr James Plant, Nepean Blue Mountains Public Health Unit on [REDACTED]

Yours sincerely

A black rectangular box redacting the signature of Dr Aditya Vyas.

Dr Aditya Vyas
A/Director, Environmental Health Branch

28/10/2020