

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

D19/25892 and
D19/25078

Your ref

M19/ 5575 and

Our ref

M19/5806

Dear Ms Livingstone

I refer to your request for a submission on a variation from Flow Systems Pty Ltd for three network operator's licences and its retail supplier's licence for the Box Hill, Shepherds Bay, Central Park, Green Square and North Cooranbong schemes.

The variation is to expand the area where sewage is collected and recycled water is supplied by the existing recycled water treatment plants at Box Hill, Shepherds Bay, Central Park and North Cooranbong. The variation will expand the area where stormwater is collected and recycled water is provided by the treatment plant at Green Square. NSW Health notes that the variation will also expand the areas where drinking water is supplied, with treated drinking water sourced from Hunter Water or Sydney Water.

NSW Health understands that no changes to the recycled water treatment process are proposed for any scheme. However, the variations include additional end uses for recycled water (car washing, general wash down on hard surfaces, street cleaning, recycled water treatment plant process water, water features, and dust suppression).

NSW Health notes that the Central Park variation includes the additional end use of recycled water for water features and that the current Green Square network operator's licence (Licence no. 15_031) includes water features as an end use. NSW Health notes that the Green Square variation plans to extend the recycled water to the Gunyama Park and Aquatic Recreation Centre.

NSW Health requests that Flow Systems confirm whether the water features at Central Park will be ornamental only, how the water is intended to be used at Green Square and how these uses will be controlled. NSW Health notes that swimming pools and interactive water features such as water splash parks are subject to requirements under the *NSW Public Health Act 2010*. Flow Systems must not encourage, via its website or other means, any non-approved end use such as recreational use of water features.

NSW Health requests that all new uses are subject to risk assessment to ensure the risks are appropriately managed. The risk assessment must be specific to the source, treatment processes and end uses for each scheme, considering the required log reduction values (LRVs) for each end use and if any additional controls required. For end uses not considered in the *Australian Guidelines for Water Recycling*, an exposure assessment is necessary to determine the required LRVs. NSW Health also recommends that Flow Systems ensure that the users of recycled water are aware of, and agree to, any requirements to manage the risk. This could include where recycled water is supplied offsite to facilities such as schools.

NSW Ministry of Health
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NSW Health notes that IPART recently provided joint feedback from NSW Health and IPART to Flow Systems on their risk assessment methodology. The risk methodology should be updated to address the feedback prior to conducting new risk workshops. Previous risk assessments should also be reviewed using the updated methodology.

NSW Health requests that the risk assessments for drinking water, sewage and recycled water be reviewed in consultation with relevant stakeholders including NSW Health, IPART and EPA. NSW Health expects Flow Systems to provide an invitation to attend risk assessments. NSW Health requests that the management plans and incident notification protocols for drinking water, sewage and recycled water are updated if details of the scheme change. NSW Health requests that that Table 4.3.2 of the incident notification protocol is corrected to refer to Northern Sydney PHU for the Shepherds Bay scheme, not Nepean Blue Mountains PHU.

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 Regulation 2012 to develop and adhere to a drinking water management system.

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

Yours sincerely

[REDACTED]

Dr Richard Broome
Director Environmental Health Branch

21/11/19