

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 Flow Systems for a new development in Glossodia under the *Water Industry Competition Act 2006*. Flow Systems has requested a new network operator licence to develop recycled water and sewerage infrastructure. Flow Systems has also applied for a variation to their existing retail licence to add Glossodia recycled water retail services, and provision of sewerage services.

NSW Health supports the application provided that the matters raised below are addressed and NSW Health is consulted by IPART during the detailed recycled water risk assessments, technology assessments and the development of a management plan for 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 Flow Systems adapt their generic *Incident Notification Protocol* to include 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 proposed water recycling scheme lists both sewage and stormwater as potential sources. However the source water has not been adequately characterised and the resulting risks are not identified or addressed in the risk assessment. NSW Health recommends further characterisation of the source water quality is undertaken as recommended by the *Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (2006)* and *Australian Guidelines for Water Recycling: Stormwater Harvesting and Reuse (2006)*. The risk assessment should be updated to reflect any additional information on the source water.

The applicant claims that the scheme will achieve 100% effluent disposal through reuse or losses and that no environmental discharge licence is required at this stage. It is unclear how recycled water will be managed during periods of wet weather or before the retail supply commences.

The risk from consumption of recycled water due to a cross-connection has been inconsistently addressed in the risk assessment and requires careful attention. Flow Systems should implement effective controls to protect against cross-connection. There is some confusion in the document regarding the water utility. Agreements with both Hunter Water and Sydney Water are mentioned for the Glossodia. The Log Reduction Values (LRV) achieved by different process units are inconsistent in the application. The applicant needs to ensure the proposed treatment train will meet the target LRV for the proposed end-uses in accordance with the *Australian Guidelines for Water Recycling*.

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 recycled water management plan and compliance with the *Australian Guidelines for Water Recycling*. NSW Health advises that verification monitoring of the recycled water system is required at a frequency recommended by the *Australian Guidelines for Water Recycling*.

I note that IPART has required Flow Systems to exclusively use the term 'recycled water' rather than 'refined water', in line with a request made by NSW Health. The term 'refined water' appears in the current application.

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 James Plant, Environmental Health Officer, Nepean Blue Mountains Public Health Unit on [REDACTED]

Yours sincerely

[REDACTED]

23.8.16

Dr Ben Scalley
Director Environmental Health Branch

NSW Health

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