

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 new development in Box Hill North 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 Box Hill North 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 assessment, technology assessment and the development of the recycled water management plan. 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 adequately 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 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. The risks from flooding, including impacts on the pressurised sewage pumping system, and the risk of mosquito breeding and the potential for mosquito borne disease due to stormwater management have not been assessed. There is some confusion in the document regarding the water utility. Agreements with both Hunter Water and Sydney Water are mentioned for the Box Hill development.

NSW Health's response to the application 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 plans and compliance with the *Australian Guidelines for Water Recycling*. NSW Health recommends that verification monitoring of the recycled water system be conducted at a frequency consistent with the *Australian Guidelines for Water Recycling*.

NSW Health

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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 Paul Byleveld, Manager Water Unit on [REDACTED]. Should the applicant require further information they may contact Helen Noonan, Environmental Health Manager, Western Sydney Public Health Unit on [REDACTED].

Yours sincerely

[REDACTED]

3/Nov/15

Dr Wayne Smith
Director Environmental Health Branch

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