

Friday, 16 May 2008

The Dept of Water and Energy  
Water For Life Plan  
Draft Water Industry Competition

To Whom It May Concern:

I am writing to comment on the draft Water Industry Competition (General) Regulation 2008.

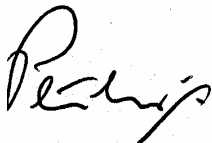
The Public Health Unit supports the use of strict licensing rules to ensure that recycled water is "fit for purpose" and is delivered in a safe, reliable manner with minimal environmental impacts.

Schedule 1 Part 2 Additional conditions for licences for water Infrastructure is key in this regard and specifically identifies water quality plans as an element to achieve this. Section 7 Water Quality Plans d) refers to the Australian Guidelines for Water Recycling as a framework for these plans and this provides a strong basis upon which to consider and manage health risks.

**18 Exemptions from the requirement for a licence: section 5 (4) (b) part d)** provides an exemption for "water or sewerage infrastructure:  
(i) that is wholly situated on premises owned by the one person or body, whether or not the whole or any part of those premises are leased to, or occupied by, some other person or body, and  
(ii) that is owned or controlled by the person or body by whom those premises are owned,"

The Public Health Unit recommends that the above infrastructure should still be expected to develop appropriate water quality plans as outlined in the Australian Guidelines for Recycling in order to ensure that any recycled water is delivered safely. Should these be exempted from the licencing system an alternate mechanism to ensure the development and use of such plans should be required that is more robust than the current Section 68 approval under the Local Government Act.

Yours sincerely,



Dr Peter Lewis  
Area Director Public Health  
Medical Officer of Health