



CENTRAL  
HIGHLANDS  
WATER

25 October 2004

Dr Robert Hall  
Director, Public Health and Chief Health Officer  
Department of Human Services  
GPO Box 1670N  
MELBOURNE VIC 3001

Dear Robert,

**RE: Proposed Safe Drinking Water Regulations**

I refer to your letter of 24 September 2004 concerning the publicly released Regulatory Impact Statement in connection with the proposed Safe Drinking Water Regulations.

Central Highlands has reviewed details of the documentation and wish to inform the Department that apart from some minor issues clearly support the movement from traditional guidelines to regulation and the application of risk management principles. The Safe Drinking Water Regulations Workshop held on Friday 8 October clarified many of our issues and I must say that your Brian Labza handled this session in a very professional and informed manner.

With regard to you seeking feedback on the draft documentation we provide the following comments.

**Regulation 9 – Approval of risk management plan auditors**

I understand that details for certification of approved auditors is yet to be finalised, however Central Highlands Water suggest our preferred position is to utilise experienced technical professionals that understand the working of the water industry, in particular drinking water quality. We believe that a HACCP food industry background may not fully complement the drinking water quality audit process and outcomes. An additional issue for concern is the potential constraint placed on water engineering consultants that have been actively involved in the development of the water quality risk management plans, and the fact that they may be prevented from becoming auditors due to potential conflict of interest.

**Regulation 10 – Drinking water quality standards**

Given the transition to regulated standards the adoption of consistent analytical methodologies and detection limits should be considered. This becomes even more critical given discrepancies in chloroacetic testing recently undertaken by Melbourne Water across various NATA laboratories.

**Schedule 2 – Drinking Water Quality Standards “Ozone and Chlorine Based Chemicals”**

One issue that motivated discussion and to my knowledge remained unresolved at the recent workshop was the proposal to include mandatory monthly Bromate and Formaldehyde testing in all systems. Central Highlands Water highly recommend that monitoring be specified to only include treatment technologies that may generate such chemical by-products.

In addition, where treatment technologies are employed that potentially may generate by-products, however through monitoring it can be demonstrated that such by-products do not exist, then relaxed monitoring should apply. In the case of monitoring for chlorine-based chemicals in chloraminated supplies, the same situation should apply. The allowance for relaxed monitoring may require a variation to Regulation 11 – Frequency of Sampling for Drinking Water. All remaining drinking water quality standards are supported.

#### **Main Report – Section 4.0 “ Nature and Extent of Problem”**

As detailed in Section 4, the Act and the proposed regulations has identified and addressed many major deficiencies in the regulatory regime. In addition to this list there are other positives where significant business benefits have been realised across Central Highlands Water through the regulatory transition period.

- Greater staff awareness and focus on water quality issues extending to Executive Management, Board of Directors, customers and stakeholders
- Recruitment of staff that provides a more professional, flexible and multi skilled water quality business approach.
- Restructuring of business areas to provide additional water quality focus.
- Injection of significant capital and operational budget to undertake major water quality improvement programs in line with determined long-term strategies.
- Compiling intellectual knowledge and information from across the business to complement and support an integrated quality system approach.

#### **Accreditation of Water Samplers**

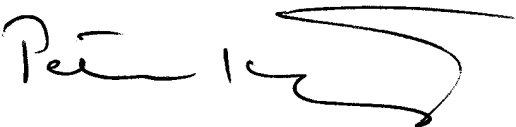
We note that the need to accredit samplers has been removed from the proposed Regulations, however I wish to advise that Central Highlands Water will ensure that our water samplers are routinely trained through our NATA Certified Laboratory.

#### **Annual Reporting**

An issue was raised at the recent workshop regarding perceived increased workload that will be placed on the Non Metropolitan Urban Sector through the mandatory production of prescribed Annual Reports. Central Highlands Water has been extremely pro-active over the past two years producing annual reports that are in accordance with the Office of the Regulator General “Melbourne Water Retailer” template. Although formatting the initial report was time consuming we have found the outcomes to be most beneficial to our staff, customers and stakeholders. We do not consider this initiative to cause significant workload.

Central Highlands Water would like to commend the department regarding the consultation process undertaken to date and furthermore look forward to continued close working relationships into the future. We trust this information meets your requirements, however if you have any enquiries concerning the issues raised or any other matter please do not hesitate to contact me on 5320 3225.

Yours sincerely



**PETER KITNEY**  
Water Manager