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22 October 2004

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

Dear Dr Hall

Proposed Drinking Water Regulations – Additional Submission

G-MW has previously provided a submission on the proposed Safe Drinking water Regulations. However a concern with the Regulatory Impact Statement has only recently been pointed out.

Specifically, Table 3 of the Regulatory Impact Statement, which summarises estimated costs of elements of the regulatory framework, records zero cost against Rural Water Authorities.

This could be due to:

- a) an assumption that the costs would be passed through directly to Rural Urban Authorities and that they therefore appear in the Regional Urban ROW

OR

- b) there is a belief that Rural Authorities will not incur costs associated with implementing the requirements of the Act.

If a) is the case this should be stated explicitly in the Table. It is our expectation that costs incurred will be passed directly onto Urban Authorities (the beneficiaries of implementation of the requirements of the Act), although the mechanism to achieve this is currently unclear.

If b) is the case I can advise that the costs associated with Rural Authorities implementation of the Act will be substantial. We have already spent \$20 000 preparing a Guide to developing Risk Management Plans and expect to spend up to \$80 000 this year in developing Risk Management Plans. There will be on-going costs associated with RMP audit, implementation, consultation, reporting and implementation. It is difficult to estimate annual costs but \$40 - \$60 000 per year would not be unreasonable. It is important to understand that these are costs that can be directly attributed to our implementation of the requirements of the Act. We would not be incurring this expense if the Act did not require it.

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Again it is our expectation that these costs will be passed on to Urban Authorities.

Whilst these costs may not be great in the overall context of Table 3 it is important, from our perspective, that they be included.

I am sure other Rural Water Authorities will have similar concerns.

Please contact me if you wish to discuss this issue further.

Yours sincerely



Pat Feehan

MANAGER ENVIRONMENT AND NATURAL RESOURCES