

**G R A M P I A N S   W I M M E R A   M A L L E E  
W A T E R   A U T H O R I T Y**

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25 October 2004

Mr Brian Labza  
Public Health Group  
Department of Human Services  
GPO Box 1670N  
MELBOURNE 3001

Dear Brian

**Safe Drinking Water Regulations 2004**

Grampians Wimmera Mallee Water (GWMW) thanks you for the opportunity to comment on the Exposure Draft for Safe Drinking Water Regulations and the associated Regulatory Impact Statement (RIS). GWMW also supports the comments made in the VicWater submission on both the Regulations and RIS.

*Part 2 Management of Risks to Water Supply*

**9. Approval of risk management plan auditors**

In subsection 1(a), the required accreditation to be held by an auditor is unnecessarily vague.

*Suggest* that membership of a specific institution, such as the Institute of Risk Management, or the Risk Management Society of the Institution of Engineers Australia, or equivalent, be substituted as a minimum qualification.

In subsection (2), the applicant for an auditor's approval must provide a written declaration that there is no conflict of interest. This implies that approval will need to be sought for every audit, as otherwise it is impossible to determine beforehand whether or not there will be a conflict.

*Suggest* that the requirement be that the declaration is made part of the audit certificate, rather than at the approval stage.



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### *Part 3 Drinking Water Quality Standards*

#### **10. Drinking water quality standards**

Turbidity is proposed as an aesthetic standard only. It is in fact the only aesthetic standard. Turbidity is an important indicator of system performance and is routinely measured at various points throughout the system.

A NATA accredited turbidity result adds very little in terms of risk management or consumer confidence. The actual turbidity value is not particularly important, only the quantum of the result. System operators are typically concerned with the change in turbidity between the water treatment plant and the reticulation.

By way of example the difference between a turbidity of 0.5 and 0.6 is not significant, but an increase in turbidity from less than 1 to somewhere near 5 may indicate issues in the reticulation that need to be addressed.

*Suggest* that on-line turbidity monitoring be allowed in lieu of the weekly random grab sample, with reporting indicating the minimums and maximums. The detail of this proposal would need to be included in a sample collection protocol, yet to be developed by DHS.

#### **11. Frequency of sampling for drinking water**

In subsection (2), it is implied that a water sample cannot be taken from the same location twice in succession. Some of the smaller towns only have two sampling points, making the implied randomness of the testing a complete nonsense. Suggest that the wording be amended to include the proviso that the sampling points be selected at random and not negate the possibility that the same sampling point be used twice.

#### **13. Accreditation of water analysts**

In subsection (1), the requirement to accredit water analysts is unnecessarily restrictive and adds no value to the process.

DHS representatives have made the comment that utilizing NATA accredited laboratories is not sufficient as previous experience has found significant variation between laboratories and between tests. Accrediting analysts will not remedy this anomaly. The anomaly is to be expected, as laboratories utilise differing equipment and are provided with differing water samples. Expecting perfectly consistent results on all occasions assumes that samples are all completely homogenous and that there is a single precise answer for all parameters tested. This is not the case.

By far the greatest source of variation in results will spring from the sample collection and delivery process, not the analysis.

*Suggest* that the requirement be to utilise NATA accredited laboratories. The NATA registration and accreditation process is a recognised and credible process that has served the needs of the water industry for many years. It is a model for accreditation in other industries. This will also ensure consistency in approach across the country.

Other Comments

The Regulatory Impact Statement refers to the eventual accreditation of sample collectors and the development of sample collection protocols. These measures will do much more to ensure consistency of the results than the requirement to accredit analysts.

*Suggest* that these matters be given priority in the first revision of the Regulations.

GWMW would appreciate it if you could advise on the decision made with respect to each of the points in the above submission, and the reason for the decision.

For further information or clarification regarding this submission, please contact the undersigned on (03) 5382 4611 or 0418 727 936.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Stephen Jewell', with a large 'X' mark at the bottom.

**Stephen Jewell**  
General Manager Urban Operations