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NORTH EAST WATER

22 October 2004

Mr Brian Labza
Public Health Group
Department of Human Services
GPO Box 1670N, Melbourne VIC 3001

Dear Brian,

SAFE DRINKING WATER REGULATIONS 2004 - SUBMISSION

Thank you for the opportunity to comment on the draft Safe Drinking Water Regulations. We have reviewed the *Exposure Draft* and submit the following comments for your consideration. In general, we support the principles and general thrust of the regulations but believe that they would benefit from more clearly defined clauses in some cases in order to reduce ambiguity and individual interpretation.

Exposure Draft for Safe Drinking Water Regulations

PART 1 - PRELIMINARY

4. Water sampling localities

(3)-(4) The area of a water sampling locality must be described by reference to its boundaries, using for example, roads or geographic coordinates.

COMMENT

What exactly constitutes a locality? The specified boundaries of some localities will require frequent updating. With new subdivisions/connections, at what point does one locality become two separate localities? This needs to be defined further, perhaps with reference to the number of connections, population or land area per locality.

5. Water sampling points

(1) The Secretary may specify as a water sampling point – a tap connected to the water supplier's system of supply within a water sampling locality.

COMMENT

This clause should specify that a water sample must be taken at the customer's tap.



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(2)(a) The number of taps specified as water sampling points for each water sampling locality must not be a number that is greater than a number that is reasonably necessary.

COMMENT

How do we determine whether the number of sample points is greater than the number reasonably necessary? A schedule showing the required number of water sampling points per number of connections, population or land area would provide clarification.

PART 3 – DRINKING WATER QUALITY STANDARDS

11. Frequency of sampling for drinking water

(1) A water supplier must, in respect of each parameter, collect a sample of drinking water at the relevant sampling frequency. Penalty: 20 units.

COMMENT

If we are using an external party (the laboratory) to sample, and they miss a sample from our agreed sampling regime, or a sample is lost or damaged, how does the penalty apply?

SCHEDULE 2 Drinking Water Quality Standards

COMMENT

The quality standards and statistical methods for assessing the standards are confusing. We have read and support the comments provided by Goulburn Valley Water and Vic Water (VWIA) on this matter.

PART 4 – OTHER MATTERS

15. Additional details to be included in annual reports of water suppliers or water storage managers

(1)(b) The annual report must include information on any issues the water supplier had with the operation of, and compliance with, regulations 10, 11 and Schedule 2.

COMMENTS

What constitutes an “issue” should be clearly defined.

There is a vast amount of information to be included in annual reports. A format for summarising all this information would be extremely helpful considering the number and variety of supplies we have.

We would be pleased to elaborate on any of the above comments if the opportunity arises and look forward to the completion of the process and release of the final regulations.

Yours sincerely



Tamsin Rutsch
Water Quality Officer