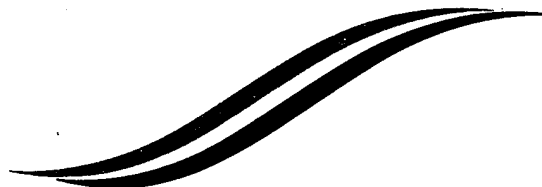


12<sup>th</sup> October 2004

Ref: 110/008/031



**SOUTH GIPPSLAND WATER**

Brian Labza  
Public Health Group  
Department of Human Services  
GPO box 1670N  
MELBOURNE VIC 3001

Dear Brian,

**RE: Safe Drinking Water Regulation 2004 – Submission**

Our comments on the draft regulations are as follows:

Regulation 6

In part 1, the phrase “a risk management plan must contain the following matters” is used, followed by a list of 6 areas of detail.

South Gippsland Water would prefer the phrase to use the expression “a risk management plan must address, and provide references to the following matters” or similar wording.

The reason for this comment is that South Gippsland Water wishes to keep its Risk Management Plan clear and succinct. We have therefore provided much of the information in separate documents. We feel this makes it more approachable to our staff, who are a major customer of this plan.

Regulation 8 – Schedule 1

We feel that the Audit Certificate does not address the issues in a satisfactory manner. In the early part of the application of the new regulations, it is likely that all authorities will meet the requirements of the Act. The issue will be identification of areas of the plan that require more work rather than outright compliance.

Regulation 10 – Schedule 2 Ozone based chemicals

We believe that the sampling frequency for zones that do not use ozone as a disinfectant should be annually unless a problem is identified.

Regulation 15 (d) (i)


It is not clear from this regulation what constitutes an event. We would wish to avoid both under, and over reporting incidents to be consistent with other Authorities.

Regulation 15 (h)

It is not clear from this regulation, at what point information on response complaints, should be provided within the annual report.

As the document is a public document, it might give the impression that not all complaints are treated seriously even though official responses may only be given for more major incidents. This is contrary to our actions where all complaints are responded to.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Brian Ashworth". The signature is fluid and cursive, with a large initial "B" and a stylized "A".

**BRIAN ASHWORTH**  
**Manager Operations**

Cc: Jason Walker  
Victorian Water Industry Association  
Suite 1, Level 6, 2 Collins Street  
MELBOURNE VIC 3121