



Our Reference: 75/445/017

21 October 2004

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

Dear Dr Hall,

RE: PROPOSED SAFE DRINKING WATER REGULATIONS

Thank you for your letter dated 24 September 2004 inviting Southern Rural Water (SRW) to provide comments on the above draft regulations.

SRW is a Victorian Government Authority responsible for managing rural water resources across southern Victoria. Under the Safe Drinking Water Act 2003, we have a role as a Water Storage Manager, supplying water to Regional Urban Water Authorities.

Regulation 6 (2) (a):

SRW recommends that 'the risk to human health that arises from the presence in water' be changed to 'the risk to human health that arises from the presence in *drinking* water'.

However, changing to 'drinking water' might restrict the intended meaning of this regulation. It should be noted that there are only two definitions of water in the Safe Drinking Water Act 2003 – drinking water and regulated water. To remain consistent with the Act and to provide clarity and consistency within the Regulations, it is suggested that these two defined terms are used where appropriate. The use of the word 'water' would require additional definition.

If left unchanged, this clause is unclear and implies that SRW risk management plans must for example include risks to human health from recreational exposure, which is not the purpose of the Act.



Regulation 7 (c) (iii) (B):

SRW recommends that 'emergencies, incidents or events that result in, ... in the case of a water storage manager, water being supplied that poses a risk to human health' be rephrased as follow:

(iii) emergencies, incidents or events that result in-

- (A) in the case of a water supplier, drinking water being supplied that poses a risk to human health;
- (B) in the case of a water storage manager, water being supplied that, even following adequate treatment by water supplier, poses a risk to human health.

As currently written, the clause is misleading and implies that the raw water that we supply should meet drinking water quality standards. However, raw water being supplied to water suppliers would pose a risk to human health if used as drinking water without or before treatment.

Thank you for the opportunity to participate in the development of this valuable document, please contact Isabelle Gabas, our Environmental Supervisor, on 51 393 163 if you wish to clarify any point.

Yours sincerely

(DR) MARTIN KENT
Chief Executive