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25/10/2004 13:45

To: <Brian.labza@dhs.vic.gov.au>
cc: (bcc: Brian Labza/HeadOffice/DHS)
Subject: Safe Drinking Water Regulations 2004 – Submission

Dear Brian,

I would like to offer the following comments on section 13 – Accreditation of Water Analysts.

We believe that the process in place by NATA of accreditation and auditing signatories is the best way to ensure laboratories are performing their duty of care. If the regulations insist on the accreditation of water analysts we feel very strongly that the accredited analysts should be a supervisory position rather than the individual analyst. If the regulations call for accreditation of individual analysts there will be a large administrative burden placed on both the laboratories and the Department as we have for example approximately 50 analysts at our Richmond site who would need to be accredited. There would also need to be several accreditation visits required per year to account for staff movements. The EPA has a system of EPA Accredited Analysts in place that could be used as a model by the Department and EPA have produced a "Guide for Analysts Appointed under the Environment Protection ACT 1970 - Publication Number 685". The EPA system was put in place for different reasons (i.e. litigation) though it would still be a useful guide for the Department to consider. If you wish to discuss these matters further please do not hesitate to call.

Regards,
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