

Mr Hugo Harmstorf Chief Executive Officer Independent Pricing and Regulatory Tribunal PO Box Q290 QVB POST OFFICE NSW 1230

Dear Mr Harmstorf

I am writing regarding the Review of the Operating Licence for Sydney Water Corporation Water Licensing - Issues Paper 2014.

NSW Health supports the retention of obligations relating to water quality, fluoridation and the Memorandum of Understanding in the Operating Licence. NSW Health considers the Licence to be the most appropriate mechanism to set out key Government requirements of public interest in a succinct and accessible form.

For many years, the Operating Licence has required risk-based drinking water management. IPART's process to audit this requirement is well established and well regarded. NSW Health recommends that the drinking water management obligation be retained. To address duplication between the Operating Licence and the *Public Health Act 2010*, the Chief Health Officer has exempted Sydney Water from the requirement for a quality assurance program for the duration of the current Operating Licence.

NSW Health supports proposed Operating Licence amendments to the requirement to maintain drinking water quality and recycled water quality management systems consistent with the *Australian Drinking Water Guidelines* and the *Australian Guidelines for Water Recycling*. This would simplify the granting of any future exemption under the *Public Health Act 2010*.

NSW Health agrees that the outputs of a drinking water quality management system could adequately address reporting requirements and additional reporting such as the 5-year Drinking Water Quality Management Plan would no longer be necessary.

Thank you for the opportunity to make a submission. NSW Health looks forward to the opportunity to discuss with IPART and to participate in the public workshop. Should officers of IPART require further information, please contact Leslie Jarvis, Water Unit on (02) 9391 9939.

Yours sincerely

20/8/14

Dr Wayne Smith

Director, Environmental Health Branch