

**Industry Feedback**

***qldwater*** *consolidated submission*

**Submission on Draft Revisions to the Australian Guidelines for Water Recycling: Managing Health and Environmental Risk (Phase 1)**

**23 March 2020**

# Background

As the central advisory and advocacy body within Queensland’s urban water industry, ***qldwater*** is a collaborative hub, working with its members to provide safe, secure and sustainable urban water services to Queensland communities.  We appreciate the timeframe allowed for consultation which has meant an opportunity to contact those members to seek feedback.  The response has not been strong which likely suggests general agreement with the proposed changes (the deadline was set well before COVID-19 issues became front of mind).

**Feedback**

We acknowledge the proposed changes and logic behind the inclusion of new research data to support the guidelines, particularly the knowledge generated through the WaterVal project, default pathogen concentrations, health risks from exposure and practical experiences from operating recycled water schemes.

Our feedback is limited to the following comments:

1. P54 “Where possible, accredited training programs and certification of operators should be used.”

The Queensland Water Directorate currently acts as secretariat for the Water Industry Operator Certification Taskforce (WIOCT) which is custodian of the *Water Industry Operator Certification Framework: Drinking Water, Wastewater, Recycled Water 2018.*

The term “certification” is not commonly understood and the guideline does not go into detail to explain it, or point to where readers should go for more information.  It is recommended that the document include a hyperlink to either WIOA’s (the national certifying body) relevant web page (<https://wioa.org.au/certification/>) or ***qldwater’s*** page (<https://www.qldwater.com.au/Skills_water_operator_certification>) set up for this purpose, or at least reference to the Framework name to support internet searching if this is not possible.

The work to include recycled water requirements into the national framework was also supported by the Australian Water Recycling Centre of Excellence.

Further references could be made in section 2.1.1 and 2.7.2.

1. The Queensland Department of Health released a new [*Guideline for low-exposure recycled water schemes*](https://www.health.qld.gov.au/__data/assets/pdf_file/0029/892604/guideline-low-exposure-recycled-water-schemes.pdf)and [*Model recycled water user agreement*](https://www.health.qld.gov.au/__data/assets/word_doc/0030/892605/model-recycled-water-user-agreement.docx) in November 2019 following extensive industry consultation.

While specific to Queensland’s regulatory framework covering water recycling, the materials are cognisant of the national guidelines, and well written and provide sound practical advice to our members and we commend them to you for consideration as a useful reference.