

24 January 2024

Naomi Menon
Director
Competition Exemptions
Australian Competition and Consumer Commission (ACCC)
GPO Box 3131
CANBERRA ACT 2601

Dear Ms Menon

Water Services Association of Australia Limited – Application for authorisation AA1000657 – interested party consultation

Thank you for your letter, dated 21 December, 2023, to interested parties in relation to the Water Services Association of Australia's (WSAA's) Application for Authorisation (AA1000657) that was submitted to the Australian Competition and Consumer Commission (ACCC) on 13 December 2023.

I am writing to you in my capacity as Principal Specialist Water Quality at Coliban Water, a regional Victorian water corporation, based in Bendigo, which supplies treated drinking water to 49 towns across north-central and northern Victoria. Coliban Water is also a current and longstanding member of WSAA.

Under Victoria's *Safe Drinking Water Act 2003*, Coliban Water has a range of legal obligations with respect to the supply of safe drinking water, including the preparation and implementation of a drinking water quality risk management plan. A key aspect of this risk management plan is subjecting water to adequate treatment to ensure that it is safe to use as drinking water.

An integral part of the treatment processes that are used to produce safe drinking water is use of gaseous chlorine to disinfect water prior to supplying it to customers. A lack of a secure supply chain for the timely delivery of gaseous chlorine would mean that Coliban Water would not be able to reliably produce safe drinking water. This would have a range of undesirable consequences for the communities that we service, given how fundamental the supply of safe drinking water is to the health and wellbeing of these communities.

Given the high level of community benefit that is derived from having a secure supply chain for the timely delivery of gaseous chlorine, Coliban Water would like to register its support for WSAA's Application for Authorisation AA1000657.

Yours sincerely



David Sheehan
Principal Specialist Water Quality