



**Australian Government**  
**Department of Climate Change, Energy,  
the Environment and Water**

Australian Competition and Consumer Commission  
GPO Box 3131  
Canberra ACT 2601

Dear Australian Competition and Consumer Commission,

The Water Services Association of Australia (WSAA) is requesting authorisation under s88(1) of the *Competition and Consumer Act 2010* to ensure resilience and diversification of the gaseous chlorine supply chain. The Department of Climate Change, Energy, the Environment and Water (the department) supports this application as an important measure to protect supplies of safe drinking water in Australia.

The Australian water sector represents a crucial infrastructure sector for Australia. The sector plays a vital role in ensuring communities have dependable access to safe and clean drinking water and adequate sanitation services - essential for the health and well-being of all Australians. In this regard, the sector is crucial to Australia's ongoing prosperity and national security.

Presently, Australia relies on a single supplier for gaseous chlorine. Gaseous chlorination is a safe, highly effective, and widely used method to disinfect and purify drinking water for human consumption. Any disruptions in the supply chain of gaseous chlorine will impact the supply and safety of drinking water and have national consequences on public health and economic productivity. Alternate supply options, including surrogate chemicals or procuring supplies from overseas, cannot viably be implemented before national stocks of gaseous chlorine are expended.

Vulnerable communities are particularly susceptible to the health impacts of poor water quality, but all Australians would be impacted. Many parts of Australia, particularly regional and remote towns including First Nation communities, often have limited infrastructure and access to technical response capabilities to manage and respond to a water crisis. These communities will face major challenges in the event of a water quality crisis.

The economic impact of a water supply disruption would be equally significant. Water is a fundamental resource input for various industries, as well as for general consumption in workplaces. A contaminated or unreliable water supply would affect productivity, disrupt businesses, and cause economic loss.

A diverse and resilient supply chain for gaseous chlorine is vital to mitigate the risk of supply disruptions and ensuring continuous supply, even during emergencies. The department urges the Australian Competition and Consumer Commission to evaluate the implications for health, productivity, community, and national security associated with the dependence on a sole supplier of gaseous chlorine with no viable contingency solution, and to take these factors into account when assessing the application.

Thank you for your consideration of this important issue.

Yours sincerely

A handwritten signature in purple ink, appearing to read 'Sheryl Hedges', with a long horizontal line extending to the right.

Sheryl Hedges  
Acting Head, Water Policy Division  
18 January 2024