



Huntlee scheme

LICENCE PLAN AUDIT **REPORT**

Altogether (formerly Flow Systems)

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Executive Summary

Audit scope

This report presents the findings of the licence plan audit of Huntlee Water Pty Ltd (a subsidiary of Flow Systems Pty Ltd), conducted in April 2021, consistent with the audit requirements set out in IPART's *Audit Guideline, Water Industry Competition Act 2006 (NSW)* (July 2020).

The audit scope includes the adequacy and currency of the Huntlee Licence Plans.

The licence plans subject to audit are the:

- Huntlee Scheme Management Plan
- Recycled Water Quality Plan
- Drinking Water Quality Plan.

Audit findings

Flow Systems (now called Altogether) have a Drinking Water Quality Plan (DWQP) and a Recycled Water Quality Plan (RWQP) that details how the ADWG Framework and AGWR Framework elements, components and actions are met. The Plans' structure is simple yet comprehensively documents how Flow Systems meets the requirements of the ADWG and AGWR Frameworks. Documents specific to individual schemes are referenced in the Scheme Management Plan. As the overarching water quality plans (DWQP and RWQP) were audited in November 2020 for the Cooranbong Licence plan audit, the scope of the Huntlee audit was reduced to:

- Audit scheme specific documentation referenced in the RWQP and DWQP, including the scheme management plans and relevant supporting documentation
- Confirmation of the process flow diagrams on site
- Assess progress of the recommendations relating to the overarching RWQP and DWQP.

A summary of compliance for the Huntlee Water Quality Plans (drinking and recycled) is shown in Table i-i.

The Licence Plans as a whole are considered adequate, with a few deficiencies noted in relation to scheme descriptions and updating of documentation following scheme expansion. These are considered non-material. Recommendations have been included to address these shortcomings.

Table i-i. Summary of compliance with Huntlee Water Quality Licence Plans

Requirement	Licence Plan	Compliance
WIC Regulation Schedule 1 clause 7(1) (a)	Water quality plan (drinking)	Non-compliant non material
WIC Regulation Schedule 1 clause 7(1) (b)	Water quality plan (recycled)	Non-compliant non material

Recommendations

Three audit recommendations were made for the Huntlee Quality Licence Plans:

- Recommendation DW 2.1: Review and update the Huntlee potable water process flow diagrams to accurately reflect current arrangements.
- Recommendation RW 2.1: Review and updated the Huntlee recycled water process flow diagrams to accurately reflect current arrangements.
- Recommendation RW 5.1: Review and update the Huntlee DIZ Standard operating procedure reference to the automatic control valve to commence irrigating.

Opportunities for improvement were also identified and are summarised in sections 4.1.4 and 4.2.4.

Contents

1	Introduction.....	1
1.1	Objectives.....	1
1.2	Licensee’s infrastructure, systems and procedures.....	1
2	Audit method.....	1
2.1	Audit scope.....	1
2.1.1	Audit standards.....	6
2.2	Audit steps.....	7
2.3	Audit grades.....	8
2.4	Audit team.....	8
2.5	Quality assurance process.....	9
3	Audit plan.....	10
4	Audit findings.....	10
4.1	Water quality plan.....	10
4.1.1	Summary of findings.....	10
4.1.2	Detailed findings.....	12
4.1.3	Summary of recommendations.....	19
4.1.4	Summary of opportunities for improvement.....	19
4.2	Recycled water quality plan.....	19
4.2.1	Summary of findings.....	19
4.2.2	Detailed findings.....	21
4.2.3	Summary of recommendations.....	30
4.2.4	Summary of opportunities for improvement.....	30
Appendix A	Audit evidence.....	A-1

Tables

Table i-i. Summary of compliance with Huntlee Water Quality Licence Plans	i
Table 2-1. Summary of licence plan audit requirements	2
Table 2-2. Drinking water licence plan audit reduced scope summary	3
Table 2-3. Recycled water licence plan audit reduced scope summary	4
Table 2-4. Audit steps	7
Table 2-5. Audit grades	8
Table 2-6. Audit team	8
Table 3-1 Huntlee Water Scheme Management Plan licence plan audit plan	10
Table 4-1. Drinking water quality plan audit requirements	10
Table 4-2. Audit findings against the ADWG Framework – reduced scope	12
Table 4-3. Recycled water quality plan audit requirements	19
Table 4-4. Audit findings against the AGWR Framework – reduced scope	21

1 Introduction

1.1 Objectives

This report presents the findings of the licence plan audit of Huntlee Water Pty Ltd, consistent with audit requirements set out in IPART's *Audit Guideline, Water Industry Competition Act 2006 (NSW)* (July 2020).

1.2 Licensee's infrastructure, systems and procedures

Huntlee Water Pty Ltd is wholly owned by Flow Systems Pty Ltd. On 12 January 2021 Flow Systems changed its name to Altogether. We refer to Flow Systems as the service provider throughout this report as it was Flow Systems' licence plans that were audited.

Flow Systems operations and obligations are managed through an integrated Business Management System (BMS), independently certified to:

- AS/NZS ISO 9001 Quality Management Systems
- AS/NZS ISO 14001 Environmental Management System
- AS/NZS 4801 Work Health and Safety Management Systems
- OHSAS 18001:2007 Occupational Health and Safety Management Systems.

The BMS is managed through a SharePoint site. As Flow Systems operate a number of schemes under the WIC Act it has a cross-functional approach to its systems and procedures. It has overarching documents including its:

- Drinking Water Quality Plan
- Recycled Water Quality Plan
- Infrastructure Operating Plan
- Incident Management Plan
- Asset Management Plan
- Monitoring and Sampling Plan

These are supported by both utility-wide and scheme-specific documentation. The documents that detail how Flow Systems meets their licence plan requirements are called up in these plans. We have recorded the documents we audited as part of these plans in Appendix A.

2 Audit method

2.1 Audit scope

The audit scope includes the adequacy and currency of the Huntlee Water Licence Plans.

The licence plans subject to audit were the:

- Huntlee Scheme Management Plan
- Recycled Water Quality Plan

- Drinking Water Quality Plan.

Verification of onsite infrastructure to test the accuracy of the process flow diagram was conducted as part of this audit.

The following informed the audit criteria:

- Audit Guideline, Water Industry Competition Act 2006 (NSW) (IPART July 2020)
- Water Industry Competition Regulation requirements
- AS/NZS 19011:2019 Guidelines for Auditing Management Systems.

Table 2-1. Summary of licence plan audit requirements

Requirement	Details
Audit Guidelines	<p>Water Quality Plan audit</p> <p>Audits the adequacy of a licensee’s Water Quality Plan, and its compliance with legislative requirements, in accordance with the requirements of Schedule 1 clause 7(1) of the WIC Regulation.</p> <p>A licensee’s Water Quality Plan for drinking water or non-potable water must be consistent with the actions outlined in the 12 framework elements of the ADWG (for drinking water) and the AGWR (for non-potable water).</p>
WIC Regulation Schedule 1 clause 7(1)	<p>7 Water quality plans</p> <p>(1) Before commencing to operate water infrastructure commercially, the licensed network operator for the infrastructure must prepare, and forward to IPART, a water quality plan, in relation to the water supplied from the infrastructure, that specifies:</p> <p>(a) if the water so supplied is drinking water, how the 12 elements of the framework for the management of drinking water quality, as detailed in the Australian Drinking Water Guidelines, have been addressed and will be implemented, and</p> <p>(b) if the water so supplied is non-potable water, how the 12 elements of the framework for the management of recycled water quality and use, as detailed in the Australian Guidelines for Water Recycling, have been addressed and will be implemented and, having regard to those guidelines, the purposes for which the water may be used and the purposes for which the water may not be used.</p>

As the overarching water quality plans (DWQP and RWQP) were audited in November 2020 for the Cooranbong Licence plan audit, the scope of the Huntlee audit was reduced to:

- Audit scheme specific documentation referenced in the RWQP and DWQP, including the scheme management plans and relevant supporting documentation (see Table 2-2 and Table 2-3)
- Confirmation of the process flow diagrams on site
- Assess progress of the recommendations relating to the overarching RWQP and DWQP

A summary of the elements and documents to be audited are shown in Table 2-2 for the DWQMP and Table 2-3 for the RWQMP.

Table 2-2. Drinking water licence plan audit reduced scope summary

Element	Component	Scope	System documents	
1	Commitment to drinking water quality management	1.1 Drinking water quality policy	×	
		1.2 Regulatory and Formal Requirements	×	
		1.3 Engaging Stakeholders	✓	Stakeholder and emergency contact list
2	Assessment of the drinking water supply system	2.1 Water Supply System Analysis	✓	Risk assessment documentation
		2.2 Assessment of Water Quality Data	✓	System description Process flow diagram
		2.3 Hazard Identification and Risk Assessment	✓	
3	Preventive measures for drinking water quality management	3.1 Preventative Measures and Multiple Barriers	✓	Scheme risk register
		3.2 Critical Control Points	✓	Critical control point documentation
4	Operational procedures and process control	4.1 Operational Procedures	✓	O&M Manual Operational procedures
		4.2 Operational Monitoring	✓	Scheme specific monitoring and sampling programme
		4.3 Corrective Action	✓	Critical control point documentation Scheme - Out of Specification Corrective Action Work Instruction
		4.4 Equipment Capability and Maintenance	✓	O&M Manual
		4.5 Materials and Chemicals	✓	O&M Manual
5	Verification of drinking water quality	5.1 Drinking Water Quality Monitoring	✓	Scheme sampling plan
		5.2 Consumer Satisfaction	×	
		5.3 Short-term Evaluation of Results	×	
		5.4 Corrective Action	×	

Element	Component	Scope	System documents		
6	Management of incidents and emergencies	6.1	Communication	✓	Stakeholder and emergency contact list
		6.2	Incident and Emergency Response Protocols	✓	Scheme notification forms Scheme - Out of Specification Corrective Action Work Instruction Scheme emergency manual
7	Employee awareness and training	7.1	Employee Awareness and Involvement	×	
		7.2	Employee Training	×	
8	Community involvement and awareness	8.1	Community Consultation	×	
		8.2	Communication	×	
9	Research and development	9.1	Investigative Studies and Research	×	
		9.2	Validation of Processes	×	
		9.3	Design of Equipment	×	
10	Documentation and reporting	10.1	Management of Documentation and Records	×	
		10.2	Reporting	×	
11	Evaluation and audit	11.1	Long-Term Evaluation of Results	×	
		11.2	Audit of Drinking Water Quality	×	
12	Review and continual improvement	12.1	Review by senior executive	×	
		12.2	Drinking Water Quality Management Improvement Plan	×	

Table 2-3. Recycled water licence plan audit reduced scope summary

Elements	Component	Scope	System documents		
1	Commitment to responsible use and management of recycled water quality	1.1	Responsible use of recycled water	×	
		1.2	Regulatory and Formal Requirements	✓	WICA Responsibilities and Authorities Matrix
		1.3	Partnerships and engagement of stakeholders (including the public)	✓	Stakeholder and emergency contact list

Elements	Component	Scope	System documents		
	1.4	Recycled water policy	×		
2	Assessment of the recycled water system	2.1	Source of recycled water, intended uses, receiving environments and routes of exposure	✓	Risk assessment documentation System description Process flow diagram
		2.2	Recycled water system analysis	✓	
		2.3	Assessment of Water Quality Data	✓	
		2.4	Hazard Identification and Risk Assessment	✓	
3	Preventive measures for recycled water management	3.1	Preventative Measures and Multiple Barriers	✓	Scheme risk register
		3.2	Critical Control Points	✓	Critical control point documentation
4	Operational procedures and process control	4.1	Operational Procedures	✓	O&M Manual Operational procedures
		4.2	Operational Monitoring	✓	Scheme specific monitoring and sampling programme
		4.3	Operational corrections	✓	Critical control point documentation Scheme - Out of Specification Corrective Action Work Instruction
		4.4	Equipment Capability and Maintenance	✓	O&M Manual
		4.5	Materials and Chemicals	✓	O&M Manual
5	Verification of recycled water quality and environmental performance	5.1	Recycled Water Quality Monitoring	✓	Scheme specific monitoring and sampling programme
		5.2	Application site and receiving environment monitoring	✓	Irrigation Management Plans
		5.3	Documentation and reliability	✓	Scheme specific monitoring and sampling programme
		5.4	Consumer Satisfaction	×	
		5.5	Short-term Evaluation of Results	×	
		5.6	Corrective responses	×	
6	Management of incidents and emergencies	6.1	Communication	✓	Stakeholder and emergency contact list

Elements		Component		Scope	System documents
		6.2	Incident and Emergency Response Protocols	✓	Scheme notification forms Scheme - Out of Specification Corrective Action Work Instruction Scheme emergency manual
7	Operator, contractor and end user awareness and training	7.1	Operator, contractor and end user awareness and involvement	×	
		7.2	Operator, contractor and end user training	×	
8	Community Involvement and awareness	8.1	Consultation with users of recycled water and the community	×	
		8.2	Communication and education	×	
9	Validation, research and development	9.1	Validation of processes	×	
		9.2	Design of equipment	×	
		9.3	Investigative studies and research monitoring	×	
10	Documentation and reporting	10.1	Management of Documentation and Records	×	
		10.2	Reporting	×	
11	Evaluation and audit	11.1	Long-Term Evaluation of Results	×	
		11.2	Audit of recycled Water Quality management	×	
12	Review and continual improvement	12.1	Review by senior managers	×	
		12.2	Recycled Water Quality Management Improvement Plan	×	

2.1.1 Audit standards

In conducting this audit, we adopted the audit standard *AS/NZS ISO 19011:2019 Guidelines for auditing management systems*. This standard ensures that the audit is conducted in accordance with an established and recognised audit protocol.

Regard was also given to the following standards/guidelines, especially where these provide specific detail that are appropriate to this audit:

- Audit Guideline, *Water Industry Competition Act 2006* (NSW) (IPART July 2020)
- ASAE 3100 (2017) Compliance Engagements issued by the Auditing and Assurance Standards Board

- ISO/IEC 17021-1:2015 Conformity Assessment – Requirements for bodies providing audit and certification of management systems (contains principles and requirements for the competence, consistency and impartiality of the audit and certification of management systems of all types).

2.2 Audit steps

A summary of audit steps is shown in Table 2-4.

Table 2-4. Audit steps

Step	Item	Details
Step 1	Initiation	Licensee initiates audit via WILMA (Water Industry Licence Management Application)
	Engagement of approved auditor	Licensee engages approved auditor to undertake audit
	Audit proposal	Auditor develops audit proposal and provides it to licensee for submission to IPART via WILMA
		Licensee submits the audit proposal to IPART for approval via WILMA IPART reviews proposal IPART approves audit proposal
Step 2	Opening meeting	Auditor conducts opening meeting
	Audit interviews	Auditor undertakes interviews
Step 3	Draft audit report	Auditor prepares draft audit report and submits it via WILMA
		Licensee and IPART review draft audit report Opportunity for comment on the draft audit report
	Final audit report	Auditor finalises audit report
	Final audit report submission	Auditor submits final report to IPART via WILMA
Step 4	Non-compliance matters	Non-compliance matters will be addressed in accordance with IPART's Compliance and Enforcement Policy

Source: Audit Guideline, *Water Industry Competition Act 2006* (NSW) (IPART, July 2020)

2.3 Audit grades

The audit grade definitions used in assessing the auditee's performance against the requirements are set out in Table 2-5.

Table 2-5. Audit grades

Grade	Detail
Compliant	Sufficient evidence is available to confirm that the requirements have been met.
Non-compliant (non-material)	Sufficient evidence is not available to confirm that the requirements have been met and the deficiency does not adversely impact the ability of the licensee to achieve defined objectives or assure controlled processes, products or outcomes.
Non-compliant (material)	Sufficient evidence is not available to confirm the requirements have been met and the deficiency does adversely impact the ability of the licensee to achieve defined objectives or assure controlled processes, products or outcomes.
No requirement	There is no requirement for the licensee to meet this criterion within the audit period.

Source: Audit Guideline, *Water Industry Competition Act 2006* (NSW) (IPART, July 2020)

2.4 Audit team

The audit team qualifications are shown in Table 2-6.

Table 2-6. Audit team

Team Member	Details
Dr Annalisa Contos Lead Auditor	<p>Dr Annalisa Contos holds the following auditor qualifications:</p> <ol style="list-style-type: none"> 1. A registered Exemplar Global lead auditor (Certificate No. 113465): <ol style="list-style-type: none"> a. Exemplar Global -DW (Drinking Water) b. Exemplar Global -RW (Recycled Water) c. Exemplar Global TL-AU (Lead Auditor) 2. NSW IPART (Independent Pricing and Regulatory Tribunal) qualified: <ol style="list-style-type: none"> a. Lead Auditor and Area Specialist Drinking Water Quality b. Lead Auditor and Area Specialist Licence and Regulatory Compliance c. Lead Auditor and Area Specialist Infrastructure Performance d. Lead Auditor and Area Specialist Recycled Water Quality e. Lead Auditor and Area Specialist Sewage Management f. Area Specialist Environmental Management

Team Member	Details
David Bartley Auditor	David Bartley holds the following auditor qualifications: <ol style="list-style-type: none"> 1. A registered Exemplar Global lead auditor (Certificate No. 206802): <ol style="list-style-type: none"> a. Exemplar Global -DW (Drinking Water) b. Exemplar Global -RW (Recycled Water) c. Exemplar Global TL-AU (Lead Auditor) 2. NSW IPART (Independent Pricing and Regulatory Tribunal) qualified: <ol style="list-style-type: none"> a. Area Specialist Infrastructure Performance b. Area Specialist Recycled Water Quality c. Area Specialist Sewage Management d. Area Specialist Environmental Management
Natalie Crawford Peer Review	Natalie Crawford holds the following auditor qualifications: <ol style="list-style-type: none"> 3. A registered Exemplar Global lead auditor (Certificate No. 130608): <ol style="list-style-type: none"> a. Exemplar Global -DW (Drinking Water) b. Exemplar Global -RW (Recycled Water) c. Exemplar Global TL-AU (Lead Auditor) 4. NSW IPART (Independent Pricing and Regulatory Tribunal) qualified: <ol style="list-style-type: none"> a. Auditor Licence and regulatory compliance b. Drinking Water Quality Auditor and Area Specialist c. Recycled Water Quality Auditor and Area Specialist d. Environmental management Auditor and Area Specialist
Steven Contos Peer Review	Steven Contos holds the following auditor qualifications <ol style="list-style-type: none"> 1. A registered Exemplar Global auditor (Certificate No. 122777): <ol style="list-style-type: none"> a. Exemplar Global -DW (Drinking Water) b. Exemplar Global -RW (Recycled Water) c. Exemplar Global -AU (Auditor)

2.5 Quality assurance process

Checks of information received were conducted and included aspects such as veracity of information, coverage of the subject area being audited and document adequacy. Professional scepticism (as per ASAE 3100) was applied as part of the document review. The quality assurance approach to this audit involved independent peer review from a qualified auditor (Steven Contos) who was not part of the audit, and review by the lead auditor.

3 Audit plan

The audit is shown in Table 3-1 for Huntlee Water Licence Plan audit.

Table 3-1 Huntlee Water Scheme Management Plan licence plan audit plan

Task	Details	Timeline
Task 1 Audit Preparation	Develop audit plan	1 December 2020
	Data request, Project management	11 January 2021
Task 2 Desktop Audit	Licence Plan provided to Auditor and IPART Information review and desktop audit	15 March 2021
Task 3 Audit Interviews/site visit	Site visit (verify PFD)	20 April 2021
	Interviews and close out meeting	23 April 2021
Task 4 Reporting	Draft report to Flow Systems and IPART	7 May 2021
	Comments received	21 May 2021
	Final Report	28 May 2021

4 Audit findings

4.1 Water quality plan

A summary of the water quality plan audit requirements and the compliance grade is shown in Table 4-1.

Table 4-1. Drinking water quality plan audit requirements

Ref	Requirement	Compliance
WIC Regulation Schedule 1 clause 7(1)	<p>7 Water quality plans</p> <p>(1) Before commencing to operate water infrastructure commercially, the licensed network operator for the infrastructure must prepare, and forward to IPART, a water quality plan, in relation to the water supplied from the infrastructure, that specifies:</p> <p>(a) if the water so supplied is drinking water, how the 12 elements of the framework for the management of drinking water quality, as detailed in the Australian Drinking Water Guidelines, have been addressed and will be implemented</p>	Non-compliant (non-material)

4.1.1 Summary of findings

Flow Systems have a Drinking Water Quality Plan (DWQP) that addresses the ADWG Framework elements, components and actions. A table is included for each component, that details how the requirement of each action is met (*Discussion* column). Evidence to meet the requirements is detailed for Documents, Records and Responsibility/Monitoring. This approach clearly and comprehensively documents how Flow System meets the requirements of the ADWG Framework. Documents specific to individual schemes are referenced in the Scheme Management Plan.

The overarching DWQP was audited as part of the Cooranbong Licence Plan Audit (November 2020). The adequacy of information specific to the Huntlee scheme is discussed below.

The Licence Plan as a whole is considered adequate, with a few deficiencies noted in relation to scheme description and documentation of deviation from DWQP requirements. These are considered non-material. Recommendations have been included to address these shortcomings.

4.1.2 Detailed findings

Adequacy of the overarching DWQP is discussed in the Cooranbong Licence Plan Audit (November 2020). The adequacy of information specific to the Huntlee scheme is discussed in Table 4-2 for each relevant ADWG Framework element. A sample of documents referenced as evidence (in both the DWQP and Huntlee Scheme Management Plan) were tested as part of the audit process. A summary of audit evidence is included in Appendix A.

Version 11.3 of the DWQP was audited for the Huntlee Scheme. While the overarching DWQP was not reaudited, we checked that the scheme specific requirements set out in the DWQP are met. Elements with recommendations or opportunities for improvement from the Cooranbong Audit are also included in Table 4-2.

The current documents are currently being progressively updated to be rebranded as Altogether and a number of these were issued during the period of this audit. These updates should continue to ensure they consistently reflect the new company name.

Table 4-2. Audit findings against the ADWG Framework – reduced scope

Element	Component	Audit findings	Evidence
Element 1 Commitment to drinking water quality management	Engaging stakeholders	The scheme specific documentation referenced in the DWQP for this component is adequate. Stakeholders specific to Huntlee scheme are listed in the Scheme Specific Stakeholder and Emergency Contact List. Key stakeholders for Huntlee relevant to the drinking water supply include IPART, NSW Health, NSW Department of Planning, Industry and Environment, Sydney Water and Cessnock City Council. The stakeholders listed are appropriate to the scheme.	DWQP Section 1.3 Huntlee Stakeholder and Emergency Contact List
Element 2 Assessment of the drinking water supply system	Water supply system analysis Assessment of water quality data	The scheme specific documentation referenced in the DWQP for this component is adequate apart from an inconsistency noted on the process flow diagram. A process flow diagram was provided for the drinking water scheme from source (Hunter Water) to customer consistent with requirements of the	DWQP Section 2.1 and 2.2 Responsibilities and Authorities Matrix FS-WAT-AUS-FM-OPS-1316

Element	Component	Audit findings	Evidence
		<p>ADWG. The process flow diagram was verified through a site visit and discussion with staff.</p> <p>Pertinent system information and key characteristics are included in Section 2.2.1 of the Huntlee Scheme Management Plan and summarised for workshops in workshop briefing material. An opportunity for improvement is noted to improve specific scheme characteristics in the scheme management plan, including detailing customer numbers, including across stages.</p> <p>OFI DW 2.1: Ensure that the customer numbers for the drinking water scheme are included in the Scheme Management Plan</p> <p>Briefing material for the Huntlee Risk Assessment was provided as evidence during the Cooranbong Audit that included water. The briefing pack included operational water quality data trends and observations.</p> <p>The process flow diagram was verified onsite during the audit. The process flow diagrams were generally correct, with a few errors identified:</p> <ul style="list-style-type: none"> • Sodium hypochlorite dose point and free chlorine monitoring is located incorrectly • Bypass of Flow Systems storage and dosing should start and finish in Hunter Water's compound • No details of Hunter Water's assets are shown even though Flow Systems maintain the RPZD and collect samples from this area <p>Recommendation DW 2.2: Review and update the Huntlee potable water process flow diagrams to accurately reflect current arrangements.</p>	<p>Huntlee Process Flow Diagram Drinking Water HU -WAT-NSW-DR-OPS-2607</p> <p>Risk Assessment Briefing Pack FS-WAT-NSW-RE-OPS-3199</p>
	Hazard identification	The scheme specific documentation referenced in the DWQP for this component is adequate.	<p>DWQP Section 2.3</p> <p>Huntlee Scheme Risk Register HU -NSW-WAT-RG-OPS-2657</p>

Element	Component	Audit findings	Evidence
	and risk assessment	<p>Briefing material for the Huntlee Risk Assessment provided as evidence during the Cooranbong Audit was consistent with the Risk Assessment Protocol for Water Products and Services.</p> <p>The risk register is satisfactory in terms of risks considered, control measures and assessment of uncertainty.</p>	Huntlee Risk Register HU-WAT-NSW-RG-OPS-2657
Element 3 Preventive measures for drinking water quality management	Preventive measures and multiple barriers	<p>The scheme specific documentation referenced in the DWQP for this component is adequate.</p> <p>General controls are included in Attachment B of the DWQP and all controls included in the scheme risk register. The Huntlee Scheme Risk Register was provided as evidence for this component. Controls are included from source to end use for each hazardous event and categorised as either preventive, detective or reactive controls. The sample of controls reviewed are consistent with the ADWG. Additional control measures were identified in the risk assessment and documented in the 'Specific actions and ALARP considerations' column of the risk register.</p>	<p>DWQP Section 3.1 and Attachment B</p> <p>Huntlee Scheme Risk Register HU - NSW-WAT-RG-OPS-2657</p>
	Critical control points	<p>The scheme specific documentation referenced in the DWQP for this component is adequate.</p> <p>Critical control points and quality control points are identified as part of the risk assessment process. Documentation of this assessment was confirmed in the Huntlee Scheme Risk Register where CCPs and QCPs are recorded in the "CCP / QCP?" column. No critical control points have been identified for the drinking water supply system. This is adequate as sodium hypochlorite is added for residual top up not primary disinfection. The free chlorine residual is identified as a QCP.</p>	<p>DWQP Section 3.2</p> <p>Huntlee Scheme Risk Register HU - NSW-WAT-RG-OPS-2657</p> <p>Huntlee Control Points Table HU-WAT-NSW-PL-OPS-2581</p>
Element 4 Operational procedures	Operational procedures	<p>The scheme specific documentation referenced in the DWQP for this component is adequate apart from a deficiency in documenting deviations from the overarching DWQP in the scheme management plan.</p>	<p>DWQP Section 4.1</p> <p>Register of Operational Procedures FS-WAT-NSW-RG-OPS-2725</p>

Element	Component	Audit findings	Evidence
and process control		The DWQP states that schemes will be operated in accordance with the scheme operations and maintenance manual. A register of Flow Systems operational procedures was provided. The register lists all procedures, marking those relevant to all systems and specific to the Huntlee system.	
	Operational monitoring	The scheme specific documentation referenced in the DWQP for this component is adequate. Operational monitoring requirements are detailed in the Monitoring and Sampling Plan.	DWQP Section 4.2 Monitoring and sampling plan FS-WAT-AUS-PL-OPS-1288 Huntlee Monitoring and Sampling Program HU -WAT-NSW-PL-OPS-1713
	Corrective action	The scheme specific documentation referenced in the DWQP for this component is adequate. The DWQP references the Huntlee Control Point table for corrective actions relating to CCPs and QCPs. Deviations for operational monitoring activities are described in the Huntlee Drinking Water Out of Specification Work Instruction.	DWQP Section 4.3 Huntlee Drinking Water Out of Specification Work Instruction HU -WAT-NSW-WI-OPS-3498 Huntlee Control Points Table HU-WAT-NSW-PL-OPS-2581
	Equipment capability and maintenance	Equipment capability and maintenance is addressed by the Infrastructure operating plan and the Flow Systems Asset Management Plan. Checklists are generated of operator's tasks from the computerised maintenance management system.	DWQP Section 4.4
	Materials and chemicals	Flow Systems manages the process of ensuring only approved chemicals and materials are used through the Evaluating Products Materials and Chemicals Procedure. The Evaluating Products Materials and Chemical Procedure includes a requirement for materials that come into contact with recycled or drinking water to be AS/NZS 4020 compliant. No scheme specific documentation was audited in relation to material usage for Huntlee.	DWQP Section 4.5

Element	Component	Audit findings	Evidence
Element 5 Verification of drinking water quality	Drinking water quality monitoring	<p>The Cooranbong Water Quality Plan Licence audit identified a deficiency in the process as described in Section 5.1 of the DWQP. The deficiency noted was the process for identifying additional sample and monitoring locations following scheme expansion. The DWQP has been updated to include that <i>“Any updates required to the Monitoring and Sampling Plan and Program due to scheme changes will be triggered by the System Change checklist”</i>.</p> <p>The scheme specific documentation referenced in the DWQP for this component is adequate. Parameters, locations and frequency of sample sites are detailed in the Huntlee Monitoring and Sampling Program. Verification sampling is conducted at the Point of Supply and Point of Use. Frequency of sampling is dependent on population being supplied. For Huntlee 52 samples per year are required at the Point of Use.</p>	<p>DWQP Section 5.1</p> <p>Monitoring and sampling plan FS-WAT-AUS-PL-OPS-1288</p> <p>Huntlee Monitoring and Sampling Program HU -WAT-NSW-PL-OPS-1713</p>
Element 6 Management of incidents and emergencies	Communication	<p>The scheme specific documentation referenced in the DWQP for this component is adequate.</p> <p>The Huntlee Scheme Management Plan references the Huntlee stakeholder and emergency contact list and Figure 8-1 of that document sets out how incidents and emergencies are generally managed.</p> <p>Key stakeholders for Huntlee relevant to the drinking water supply include IPART, NSW Health, NSW Department of Planning, Industry and Environment, Sydney Water and Cessnock City Council. The stakeholders listed are appropriate to the scheme.</p>	<p>DWQP Section 6.1</p> <p>Huntlee Stakeholder and Emergency Contact List</p>
	Incident and emergency response protocols	<p>The scheme specific documentation referenced in the DWQP for this component is adequate.</p> <p>The DWQP refers to the Water Operations Incident Management, Reporting and Investigation Procedure and the Incident Notification and Response Protocol with NSW Health. These documents refer to scheme specific WICA Form A and B (which are the IPART Form A and B pre filled with relevant contact details). Scheme specific notification forms for</p>	<p>DWQP Section 6.2</p> <p>WICA Form A – Incident Initial Notification Huntlee</p> <p>WICA Form B – Incident Initial Notification Huntlee</p>

Element	Component	Audit findings	Evidence
		<p>Huntlee (WICA Form A and B) were provided as evidence. The Huntlee Scheme Management Plan does not currently include a reference to the scheme specific Huntlee Incident Notification forms (Form A and B). The Incident Notification and Response Protocol with NSW Health references these forms and describes when they should be used.</p> <p>The Drinking Water Out of Specification Corrective Actions Work Instruction for Huntlee is adequate.</p>	<p>Huntlee Drinking Water Out of Specification Work Instruction HU - WAT-NSW-WI-OPS-3498</p> <p>Incident Notification and Response Protocol with NSW Health for Supply of Sewerage, Recycled Water and Drinking Water Services AG-WAT-AUS-PR-INC-1277</p>
Element 9 Research and development	Investigative studies and research monitoring Validation of processes Design of equipment	<p>The Cooranbong Water Quality Plan Licence audit assessed that the process for research and development is adequately described in Section 9.1, 9.2 and 9.3 of the DWQP. An opportunity for improvement in the process as described in Section 9 of the DWQP. An observation was noted that the while the WICA Change checklist refers to change that would require significant change to a licence plan, referencing to requirements for when revalidation should occur could be more explicit.</p> <p>OFI DW 9.1: Include explicit requirements for when revalidation will need to occur.</p>	<p>DWQP Section 9</p> <p>WICA Change checklist FS-WAT-NSW-FM-GOV-2690</p>
Element 10 Documentation and reporting	Reporting	<p>The Cooranbong Water Quality Plan Licence audit identified a deficiency in the process as described in Section 10.2 with the DWQP silent on annual reporting to consumers. The DWQP has been updated to included that an annual report will be made available via the Flow website and be produced in concurrence with the annual IPART compliance report. This component is considered adequate.</p> <p>There is no procedure listed that describes the activities required to develop the reports. While there is no explicit requirement for this, we are unable to confirm that annual report content would meet the requirements of this clause as the implementation of the licence plan is outside the scope of this audit. An area for improvement is to include further details on IPART compliance reporting regulations, such as</p>	<p>DWQP Section 10.2</p>

Element	Component	Audit findings	Evidence
		<p>reference to the Network Operator Reporting Manual and Retail Supplier's Reporting Manual.</p> <p>The Huntlee Water Scheme Management Plan had style reference errors in some cross references.</p> <p>OFI DW 10.1: Develop procedures that describe the activities required to develop external reports and reference these in the DWQP.</p> <p>OFI DW10.2: Review the Huntlee Water Scheme Management Plan to ensure cross references are accurate.</p>	
Element 11 Evaluation and audit	Long-term evaluation of results	<p>The Cooranbong Water Quality Plan Licence audit identified a deficiency in the process as described in Section 11.1 of the DWQP, that the DWQP was silent on the assessment of water quality performance as part of an annual review reporting process.</p> <p>Section 11.1 of the DWQP has been updated to include that an annual review of long-term water quality performance will be conducted at the same time as annual reporting and that this will be recorded in review meeting minutes and the risk review briefing pack.</p> <p>This component is now considered adequate following completion of the identified recommendation.</p>	DWQP Section 11.1

4.1.3 Summary of recommendations

There is one drinking water recommendation:

- Recommendation DW 2.1: Review and update the Huntlee potable water process flow diagrams to accurately reflect current arrangements.

4.1.4 Summary of opportunities for improvement

A summary of opportunities for improvement are detailed below:

- OFI DW 2.1: Ensure that the customer numbers for the drinking water scheme are included in the Scheme Management Plan
- OFI DW 9.1: Include explicit requirements for when revalidation will need to occur.
- OFI DW 10.1: Develop procedures that describe the activities required to develop external reports and reference these in the DWQP.
- OFI DW10.2: Review the Huntlee Water Scheme Management Plan to ensure cross references are accurate.

4.2 Recycled water quality plan

A summary of the water quality plan audit requirements and the compliance grade is shown in Table 4-3.

Table 4-3. Recycled water quality plan audit requirements

Ref	Requirement	Compliance
WIC	7 Water quality plans	Non-compliant
Regulation Schedule 1 clause 7(1)	<p>(1) Before commencing to operate water infrastructure commercially, the licensed network operator for the infrastructure must prepare, and forward to IPART, a water quality plan, in relation to the water supplied from the infrastructure, that specifies:</p> <p>(b) if the water so supplied is non-potable water, how the 12 elements of the framework for the management of recycled water quality and use, as detailed in the Australian Guidelines for Water Recycling, have been addressed and will be implemented and, having regard to those guidelines, the purposes for which the water may be used and the purposes for which the water may not be used.</p>	(non-material)

4.2.1 Summary of findings

Flow Systems have a Recycled Water Quality Plan (RWQP) that addresses the AGWR Framework elements, components and actions. A table is included for each component, that details how the requirement of each action is met (*Discussion* column). Evidence to meet the requirements is detailed for Documents, Records and

Responsibility/Monitoring. This approach clearly and comprehensively documents how Flow System meets the requirements of the AGWR Framework. Documents specific to individual schemes are referenced in the Scheme Management Plan.

The overarching RWQP was audited as part of the Cooranbong Licence Plan Audit (November 2020). The adequacy of information specific to the Huntlee scheme is discussed below.

The Licence Plan as a whole is considered adequate, with a few deficiencies noted in relation to document errors and processes relating to the updating of documentation following scheme expansion. These are considered non-material. Recommendations have been included to address these shortcomings.

4.2.2 Detailed findings

Adequacy of the overarching RWQP is discussed in the Cooranbong Licence Plan Audit (November 2020). The adequacy of information specific to the Huntlee scheme is discussed in Table 4-4 for each relevant AGWR Framework element. A sample of documents referenced as evidence (in both the RWQP and Huntlee Scheme Management Plan) were tested as part of the audit process. A summary of audit evidence is included in Appendix A.

Version 14.3 of the RWQP was audited for the Huntlee Scheme. While the overarching RWQP was not reaudited, we checked that the scheme specific requirements set out in the RWQP are met. Elements with recommendations or opportunities for improvement from the Cooranbong Audit are also included in Table 4-4.

The current documents are currently being progressively updated to be rebranded as Altogether and a number of these were issued during the period of this audit. These updates should continue to ensure they consistently reflect the new company name.

Table 4-4. Audit findings against the AGWR Framework – reduced scope

Element	Component	Audit findings	Evidence
Element 1 Commitment to responsible use and management of recycled water quality	Regulatory and formal requirements	The scheme specific documentation referenced in the RWQP for this component is adequate. Scheme governance is documented in the WIC Responsibilities and Authorities matrix. Responsibilities appear to be appropriate to the included areas.	RWQP Section 1.2 WICA Responsibilities and Authorities Matrix FS-WAT-AUS-FM-OPS-1316
	Partnerships and engagement of stakeholders	The scheme specific documentation referenced in the RWQP for this component is adequate. Stakeholders specific to the Huntlee scheme are listed in the scheme specific Stakeholder and Emergency Contact List. Public and environmental health stakeholders listed are appropriate and include IPART, NSW Health, NSW Department of Planning, Industry and Environment, NSW Environment Protection Authority and Cessnock City Council.	RWQP Section 1.3 Huntlee Stakeholder and Emergency Contact List HU -WAT-NSW-RG-INC-3350
Element 2 Assessment of the	Intended uses and source of recycled water	The scheme specific documentation referenced in the RWQP for this component is adequate. Intended uses are documented in Table 7-3 of the Huntlee Scheme Management Plan with a	RWQP Section 2.1 Huntlee Scheme Management Plan HU -WAT-NSW-PL-OPS-1275

Element	Component	Audit findings	Evidence
recycled water system		reference to the Flow WICA Licences - Authorised Purposes Matrix. The approved end uses for Huntlee in the authorised purposes matrix are consistent with the approved end users in the licence.	Flow WICA Licences - Authorised Purposes Matrix FS-WAT-NSW-RG-OPS-2918 Network Operating Licence, 15_030 Huntlee Water, dated 27 August 2015
	Recycled water system analysis Assessment of water quality data	<p>Minor deficiencies were identified in scheme specific documentation referenced in the RWQP for this component relating to the process flow diagram.</p> <p>Scheme characteristics are documented in the Huntlee Scheme Management Plan. Consistent with this requirement, scheme characteristics including connections, source, treatment processes and distribution are included in Table 2-4 Recycled Water system overview description in the Huntlee Scheme Management Plan.</p> <p>A process flow diagram was provided for the recycled water scheme consistent with requirements of the AGWR to outline steps and processes from source to application. The process flow diagram was verified onsite during the audit. The process flow diagrams were correct except the return streams on the Huntlee recycled water PFD return to the wrong location.</p> <p>A further observation was a lack of consistency in showing flow meters which may impact the readers understanding of the system.</p> <p>Recommendation RW 2.1: Review and update the Huntlee process flow diagrams to accurately reflect current arrangements.</p>	<p>RWQP Section 2.2 and 2.3</p> <p>Huntlee Point Scheme Management Plan Section 7.3</p> <p>Huntlee Water Process Flow Diagram Recycled Water & Sewerage HU -WAT-NSW-DR-OPS-2613</p> <p>Huntlee Risk Register HU-WAT-NSW-RG-OPS-2657</p>
	Hazard identification and risk assessment	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>Briefing material for the Huntlee Risk Assessment provided as evidence during the Cooranbong Audit was consistent with the Risk Assessment Protocol for Water Products and Services.</p>	<p>RWQP Section 2.4</p> <p>Huntlee Scheme Risk Register HU -NSW-WAT-RG-OPS-2657</p>

Element	Component	Audit findings	Evidence
		The risk register is satisfactory in terms of risks considered, control measures and assessment of uncertainty.	
Element 3 Preventive measures for recycled water management	Preventive measures and multiple barriers	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>General controls are included in Attachment B of the RWQP and all controls included in the scheme risk register. The Huntlee Scheme Risk Register was provided as evidence for this component.</p> <p>Controls are included from source to end use for each hazardous event and categorised as either preventive, detective or reactive controls. The sample of controls reviewed are consistent with the AGWR. Additional control measures were identified in the risk assessment and documented in the 'Specific actions and ALARP considerations' column of the risk register.</p>	<p>RWQP Section 3.1</p> <p>Huntlee Scheme Risk Register HU -NSW-WAT-RG-OPS-2657</p>
	Critical control points	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>Critical control points are identified as part of the risk assessment process. Documentation of this assessment was confirmed in the Huntlee Scheme Risk Register where CCPs and QCPs are recorded in the "CCP / QCP?" column.</p> <p>Critical control points for Huntlee are documented in the Huntlee Control Points Table. Critical control points in this table are consistent against those assessed in the risk register.</p> <p>Proposed revisions to critical control points and log reduction value were provided during the audit. The UV disinfection critical limit for UVT decreased from < 55 to < 47 mJ/cm². Limit changes are appropriate to achieve the claimed 1.0 LRV reduction for viruses in accordance with the USEPA Ultraviolet Disinfection Guidance Manual (2006). Log reduction values achieved for UV disinfection were reduced from 4 to 3.5 for protozoa and bacteria. The basis for</p>	<p>RWQP Section 3.2</p> <p>Huntlee Scheme Risk Register HU -NSW-WAT-RG-OPS-2657</p> <p>Huntlee Control Points Table HU-WAT-NSW-PL-OPS-2581</p> <p>Huntlee LWC Log Reduction Values HU -WAT-NSW-PL-OPS-2795</p> <p>Email to NSW Health 'Change Notice - CCP and Log Reduction'</p> <p>Change Notice Form: Control Point and Log Reduction Review for Box Hill, Cooranbong, Huntlee and Pitt Town</p>

Element	Component	Audit findings	Evidence
		<p>these changes is adequately documented in the Table 2 Change Assessment of the Change Notice Form. Evidence was provided of consultation with NSW Health, in the form of an email where updated documentation and a change notice form was provided. Changes to the critical control point and log reduction value documentation for Huntlee are adequate.</p> <p>Critical control points values are consistent across the Control Point Tables and the Log Reduction Value documents.</p> <p>The references used in the CCP justification column are considered appropriate. It was confirmed that the CCP limits (current at the time of the site visit; version 3) were consistent with those in SCADA and the UV disinfection local control panel. It was not reviewed if proposed updated CCP limit were consistent with SCADA.</p>	
Element 4	Operational procedures and process control	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>The RWQP states that schemes will be operated in accordance with the scheme operations and maintenance manual. A finalised Operations and Maintenance (O&M) Manual – Huntlee LWC Operation and Maintenance Manual was provided as evidence. SOPs and Work Instructions are documented in the register of operational procedures. The procedures identified for Huntlee in the register are appropriate.</p>	<p>RWQP Section 4.1</p> <p>Huntlee LWC Operations and Maintenance (O&M) Manual – HU -WAT-NSW-MN-OPS-2507</p> <p>Register of Operational Procedures FS-WAT-NSW-RG-OPS-2725</p>
	Operational monitoring	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>Operational monitoring requirements are detailed in the Monitoring and Sampling Plan. The Huntlee Monitoring and Sampling program was provided and sample items were cross</p>	<p>RWQP Section 4.2</p> <p>Monitoring and sampling plan FS-WAT-AUS-PL-OPS-1288</p> <p>Huntlee Monitoring and Sampling Program HU -WAT-NSW-PL-OPS-1713</p>

Element	Component	Audit findings	Evidence
		checked against the sampling plan; the items checked were found to be consistent.	
	Operational corrections	<p>The scheme specific documentation referenced in the RWQP for this component is adequate. Discussions on corrective actions are also included in Element 6 in the Incident and Emergency Response Protocols section.</p> <p>Critical control points summary corrective actions are included in the control point tables. The Huntlee Control Points Table procedures for shutdown and off specification water diversion are appropriate.</p> <p>Deviations for other operational monitoring activities are described in the Operational Monitoring Corrective Actions Procedure.</p>	<p>RWQP Section 4.3</p> <p>Huntlee Control Points Table HU-WAT-NSW-PL-OPS-2581</p> <p>Huntlee LWC Operations and Maintenance (O&M) Manual – HU -WAT-NSW-MN-OPS-2507</p>
	Equipment capability and maintenance	<p>The scheme specific documentation referenced in the RWQP for this component is adequate. The Huntlee Operations and Maintenance Manual refers to Flow's Computerised Maintenance Management System (CMMS) for maintenance schedules. A register of calibrations and control point inspections was provided as evidence of scheduling. Scheduling included annual, quarterly and weekly calibrations and checklist. An example of the Annual Control Point Checklist for Huntlee was provided as evidence of the parameters checked, which included calibrations and checks of CCP equipment included for pH, turbidity, chlorine and UVT.</p>	<p>RWQP Section 4.4</p> <p>Huntlee LWC Operations and Maintenance (O&M) Manual – HU -WAT-NSW-MN-OPS-2507</p> <p>PPM Schedules Calibration and Control Points Housing Developments from RAM Work Order Number 033714, Local Water Centre Huntlee, , Annual Instrument Calibration and completed calibration certificates, Completed date: 11/06/2020</p>
	Materials and chemicals	<p>The scheme specific documentation referenced in the RWQP for this component is adequate. Signage and labelling of chemical dosing points was noted during the site audit of Huntlee. The Huntlee Operations and Maintenance Manual specifies details of chemical dosing in the treatment process. Evaluating Products Materials and Chemical Procedure includes a requirement for</p>	<p>RWQP Section 4.5</p> <p>Scheme management plan</p> <p>Huntlee LWC Operations and Maintenance (O&M) Manual – HU -WAT-NSW-MN-OPS-2507</p>

Element	Component	Audit findings	Evidence
		materials that come into contact with recycled or drinking water to be AS/NZS 4020 compliant. No scheme specific documentation was audited in relation to material usage for Huntlee.	
Element 5 Verification of recycled water quality and environmental performance	Recycled water quality monitoring Documentation and reliability	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>Characteristics to be monitored are included within the overarching Monitoring and Sampling Plan. A check was carried out against the verification requirements in the Monitoring and Sampling Plan against the Huntlee Monitoring and Sampling Program; with the documents found to be consistent.</p> <p>The Monitoring and Sampling Plan and Huntlee Monitoring and Sampling Program is adequate for verification monitoring against the requirements of the AGWR.</p>	<p>RWQP Section 5.1 and 5.3</p> <p>Monitoring and sampling plan FS-WAT-AUS-PL-OPS-1288</p> <p>Huntlee Monitoring and Sampling Program HU -WAT-NSW-PL-OPS-1713</p>
	Application site and receiving environment	<p>The Huntlee DIZ Standard operating procedure was reviewed and refers to opening the isolation valve to commence irrigation. This valve is not identified in the procedure. Flow Systems have since advised that "This is a network valve which is normally open. It is no longer operated as part of the DIZ as there is an automatic control valve (AV1301) and manual valve in the cage which are operated instead."</p> <p>Recommendation RW 5.1: Review and update the Huntlee DIZ Standard operating procedure reference to the automatic control valve to commence irrigating.</p>	<p>RWQP Section 5.2</p> <p>Huntlee Point Scheme Management Plan</p> <p>Huntlee DIZ Standard operating procedure HU -WAT-NSW-PR-INC-2772</p> <p>Huntlee - Irrigation Management Plan for Triton Bvd</p>
Element 6 Management of incidents	Communication	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>The Huntlee Scheme Management Plan references the Huntlee stakeholder and emergency contact list and Figure 8-1 sets out how</p>	<p>RWQP Section 6.1</p> <p>Huntlee Stakeholder and Emergency Contact List</p>

Element	Component	Audit findings	Evidence
and emergencies		<p>incidents and emergencies are generally managed. Flow Systems has regulatory reporting obligations for incidents.</p> <p>Key stakeholders for Huntlee relevant to the recycled water supply include IPART, NSW Health, NSW Department of Planning, Industry and Environment, NSW Environment Protection Authority, Hunter Water and Cessnock City Council. The stakeholders listed are appropriate to the scheme.</p>	
	Incident and emergency response protocols	<p>The scheme specific documentation referenced in the RWQP for this component is adequate.</p> <p>The RWQP refers to the Water Operations Incident Management, Reporting and Investigation Procedure and the Incident Notification and Response Protocol with NSW Health. These documents refer to scheme specific WICA Form A and B (which are the IPART Form A and B pre filled with relevant contact details). Scheme specific notification forms for Huntlee (WICA Form A and B) were provided as evidence. The Huntlee Scheme Management Plan does not currently include a reference to the scheme specific Huntlee Incident Notification forms (Form A and B). The Incident Notification and Response Protocol with NSW Health references these forms and describes when they should be used.</p> <p>The Recycled Water Out of Specification Work Instruction for Huntlee provided as evidence is adequate.</p>	<p>RWQP Section 6.2</p> <p>WICA Form A – Incident Initial Notification Huntlee</p> <p>WICA Form B – Incident Initial Notification Huntlee</p> <p>Huntlee Recycled Water Out of Specification Work Instruction HU-WAT-NSW-WI-OPS-3499</p> <p>Incident Notification and Response Protocol with NSW Health for Supply of Sewerage, Recycled Water and Drinking Water Services AG-WAT-AUS-PR-INC-1277</p>
Element 8 Community involvement and awareness	Consultation with users of recycled water and the community Communication and education	<p>The Cooranbong Water Quality Plan Licence audit identified an opportunity for improvement to include further information in RWQP Component 8.1 on the assessment process used in developing the customer communication program.</p> <p>OFI RW 8.1: Include further information in the RWQP documenting the assessment requirements for developing the consultation program.</p>	RWQP Section 8.1 and 8.2

Element	Component	Audit findings	Evidence
Element 9 Validation, research and development	Validation of processes Design of equipment Investigative studies and research monitoring	<p>The Cooranbong Water Quality Plan Licence audit assessed that the process for validation, research and development is adequately described in Section 9.1, 9.2 and 9.3 of the RWQP. An opportunity for improvement exists in the process for revalidation of equipment which occurs on system change. Processes to evaluate system change are assessed using the System Change Checklist and the WICA Change checklist. An observation was noted that while the WICA Change checklist refers to change that would require significant change to a licence plan, referencing to requirements for when revalidation should occur could be more explicit.</p> <p>OFI RW 9.1: Detail more explicit requirements for when revalidation will need to occur in the RWQP.</p>	<p>RWQP Section 9.1, 9.2 and 9.3 WICA Change checklist FS-WAT-NSW-FM-GOV-2690</p>
Element 10 Documentation and reporting	Reporting	<p>The Cooranbong Water Quality Plan Licence audit identified a deficiency in the process as described in Section 10.2 with the RWQP being silent on annual reporting to end users. The RWQP has been updated to include that the annual report will be made available via the Flow website and be produced in concurrence with the annual IPART compliance report. This component is considered adequate.</p> <p>There is no procedure listed that describes the activities required to develop the reports. While there is no explicit requirement for this, we are unable to confirm that the Annual report contents would meet the requirements of this clause as the implementation of the licence plan is outside the scope of this audit. An area for improvement is to include further details on IPART compliance reporting regulations, such as reference to the Network Operator Reporting Manual and Retail Supplier's Reporting Manual.</p>	<p>RWQP Section 10.2 Huntlee Water Scheme Management Plan</p>

Element	Component	Audit findings	Evidence
		<p>The Huntlee Water Scheme Management Plan had style reference errors in some cross references.</p> <p>OFI RW 10.1: Develop procedures that describe the activities required to develop external reports and reference these in the RWQP.</p> <p>OFI RW10.2: Review the Huntlee Water Scheme Management Plan to ensure cross references are accurate.</p>	
Element 11 Evaluation and audit	Long-term evaluation of results	<p>The Cooranbong Water Quality Plan Licence audit identified a deficiency in the process described in Section 11.1 of the RWQP. The RWQP was silent on the assessment of recycled water quality performance as part of an annual review reporting process.</p> <p>Section 11.1 of the RWQP has been updated to include that an annual review of long-term water quality performance will be conducted at the same time as annual reporting and that this will be recorded in review meeting minutes and the risk review briefing pack.</p> <p>This component is now considered adequate following completion of the identified recommendation.</p>	RWQP Section 11.1
	Audit of recycled water quality management	<p>The Cooranbong Water Quality Plan Licence audit identified an opportunity for improvement in the Audit Procedure. Internal audits are conducted at a minimum annually. The internal audit program did not explicitly specify audits of recycled water quality data. It was confirmed in interviews that quality audits included recycled water. The Internal Audit Program for 2020-21 was provided as evidence of this process.</p> <p>OFI RW 11.1: Clarify that review of recycled water quality data is covered under the internal audit objective for 'quality'.</p>	<p>RWQP Section 11.2</p> <p>Audit Procedure FS-ALL-AUS-PR-GOV-1364</p>

4.2.3 Summary of recommendations

A summary of recommendations for the Huntlee recycled water quality plan is detailed below:

- Recommendation RW 2.1: Review and updated the Huntlee recycled water process flow diagrams to accurately reflect current arrangements.
- Recommendation RW 5.1: Review and update the Huntlee DIZ Standard operating procedure reference to the automatic control valve to commence irrigating.

4.2.4 Summary of opportunities for improvement

A summary of opportunities for improvement for the Huntlee recycled water quality plan are detailed below:

- OFI RW 8.1: Include further information in the RWQP documenting the assessment requirements for developing the consultation program
- OFI RW 9.1: Details more explicit requirements for when revalidation will need to occur in the RWQP
- OFI RW 10.1: Develop procedures that describe the activities required to develop external reports and reference these in the RWQP.
- OFI RW 10.2: Review the Huntlee Water Scheme Management Plan to ensure cross references are accurate.
- OFI RW 11.1: Clarify that review of recycled water quality data is covered under the internal audit objective for 'quality'

Appendix A Audit evidence

Document name and number	Version	Date
Drinking Water Quality Plan	12	24/02/2021
Recycled Water Quality Plan	13	11/03/2021
Huntlee Scheme Management Plan HU -WAT-NSW-PL-OPS-1275	14	19/03/2021
Huntlee Drinking Water Out of Specification Work Instruction HU - WAT-NSW-WI-OPS-3498	1.0	11/03/2021
Huntlee Recycled Water Out of Specification Work Instruction - HU - WAT-NSW-WI-OPS-3499	1.0	11/03/2021
Huntlee Control Points Table HU-WAT-NSW-PL-OPS-2581	2.1	12/04/2021
Huntlee LWC Log Reduction Values HU -WAT-NSW-PL-OPS-2795	3.1	12/04/2021
Huntlee Process Flow Diagram Drinking Water HU -WAT-NSW-DR-OPS-2607	2	28/06/2019
Huntlee Water Process Flow Diagram Recycled Water & Sewerage HU - WAT-NSW-DR-OPS-2613	3	30/03/2021
Huntlee LWC Operations and Maintenance (O&M) Manual – HU -WAT-NSW-MN-OPS-2507	2.0	26/02/2021
Huntlee Monitoring and Sampling Program HU -WAT-NSW-PL-OPS-1713	1.5	21/10/2020
Huntlee Incident & Emergency Manual Table of Contents HU -WAT-NSW-MN-INC-3367	2.0	01/02/2021
Huntlee DIZ Standard operating procedure HU -WAT-NSW-PR-INC-2772	1	15/03/2021
Change Notice Form: Control Point and Log Reduction Review for Box Hill, Cooranbong, Huntlee and Pitt Town	1.0	13/04/2021
Email to NSW Health 'Change Notice - CCP and Log Reduction'		13/04/2021
Huntlee - Irrigation Management Plan for Triton Bvd	1	11/03/2021
Monitoring and sampling plan FS-WAT-AUS-PL-OPS-1288	13.1	16/12/2020
Monitoring and sampling program FS-WAT-NSW_PL-OPS-2701	1.5	21/10/2020
Huntlee Scheme Risk Register HU -NSW-WAT-RG-OPS-2657	9	29/10/2019
Huntlee Stakeholder and Emergency Contact List HU -WAT-NSW-RG-INC-3350	1	08/10/2020
Incident Management Plan (IMP)	9	25/01/2021
Flow WICA Licences - Authorised Purposes Matrix FS-WAT-NSW-RG-OPS-2918	3	08/03/2021
Recycled water irrigation monitoring plan (RWIMP) AG-WAT-NSW-PL-OPS-2299	5	3/03/2021
Risk assessment protocol for water and product services FS-WAT-NSW-PR-OPS-2466	3	16/8/2020
Register of Operational Procedures FS-WAT-NSW-RG-OPS-2725	3.1	2/2/2021
Responsibilities and Authorities Matrix FS-WAT-AUS-FM-OPS-1316	6.2	7/10/2020
WICA Form A – Incident Initial Notification Huntlee	3.0	11/03/2021

Document name and number	Version	Date
WICA Form B – Incident Initial Notification Huntlee	3.0	11/03/2021