

22 January 2024

Naomi Menon
Director, Competition Exemption
Australian Competition and Consumer Commission
23 Marcus Clare St
CANBERRA ACT 2601

Dear Naomi

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

Thank you for the opportunity to provide this submission in strong support of Water Services Association of Australia Limited – Application for authorisation AA1000657.

Shoalhaven Water manages four water treatment plants (WTP) and 13 sewage treatment plants (STP) on behalf of Shoalhaven City Council. These schemes service approximately 53,000 connected properties (approximately 105,000 population) from Berry and Kangaroo Valley in the northern Shoalhaven to Lake Tabourie in the south. 14 satellite chlorinators are located throughout the LGA, used for re-chlorination of drinking water reservoirs.

Shoalhaven Water (SW) also manages a water treatment plant and a sewage treatment plant, under contract to the Federal Government, that services Jervis Bay Territory. All the above facilities use gaseous chlorine which is supplied by Ixom via 3 weekly “milk run” delivery services.

Shoalhaven’s largest WTP is Bamarang (producing approx. 90% of the potable water for the LGA), which produces approximately 10,000 ML of drinking water per year and uses 31 tonnes of gaseous chlorine per year. At Bamarang WTP, we store the equivalent of 6-8 weeks usage of gaseous chlorine. Other WTPs have a longer storage capability.

Given the criticality of the product to provide this critical resource to our communities (particularly over holiday periods) SW orders more storage vessels than would generally be required. This adds significant cost as they are charged monthly on a cost per vessel basis (vessels in transport are charged as “in our possession”). Additional building space is required to store additional vessels. The larger the building and vessels being stored, the greater the responsibility for dangerous goods.

In 2023 Shoalhaven Water used 69 x 920kg drums and 163 x 70kg cylinders of gaseous chlorine. Ixom is the sole supplier of the product and as such the risk outlined by WSAA is a real one that needs to be mitigated urgently. The WSAA proposal is a positive step in mitigating the risk by seeking resilience of supply and Shoalhaven Water strongly supports their total Application to ACCC.

Please note this submission is provided as a Shoalhaven Water submission and, given the time constraints for submissions, has not been endorsed by the Council.

Yours faithfully



Robert Horner
Executive Manager - Shoalhaven Water
Shoalhaven City Council

p [redacted]
e [redacted]
w <http://shoalhaven.nsw.gov.au>