

Submission to National Water Reform 2026 Interim Update 2

Ian Fisher BEng (Hons), PhD, CPEng

I made an earlier submission on the definition of the safety of drinking water and how it should be better monitored and reported, in response to Interim Update 1. This submission is concerned with progress towards the assessment and reporting of safety of drinking water, as described in Interim Update 2 (“the Update”).

Under the heading of “urban water not formally regulated” (p9), the Update states that “Updated National Performance Report (NPR) indicators and expanded reporting requirements for small providers have increased information about pricing and service outcomes.” For water suppliers of >10,000 connections, the annual compliance indicators H3 and H4 (E. coli and health-based chemical respectively) have been required for many years – at least since 2013-14. Although “very small” providers (<10,000 connections) were included in the NPR for the first time in 2025-26, they are still not required to report on these compliance indicators, (only on whether they have a water quality management plan – indicator H1). From a viewpoint of reporting safety, this is very minor progress.

If the health-based chemical substances for H4 are to be selected for monitoring by a hazard identification and risk assessment conducted by each water provider, as recommended by NHMRC (2011), then at least the number of substances selected should also be reported to give some indication of the range of surveillance undertaken (with a link to the list of actual substances monitored).

As argued in my submission on Update 1, the same compliance indicators (H3 and H4) need to be reported by the “very small” providers before the service outcome of safety can be said to be “largely achieved”. This is much more urgent than indicated by the Performance benchmarking section of the Update, which states that “the NPR technical reference group will discuss expanding this subset of indicators in coming years”.

The Inquiry’s Terms of Reference (Update Appendix E p35) states that “The Commission should also examine all jurisdictions’ water policy and regulatory settings required to support the long-term sustainability of Australia’s water services industry, having regard to ... other key priorities (... National Closing the Gap targets...). In relation to drinking water, Target 9b includes access to safe and reliable drinking water. However, this target does not seem to be considered specifically in this Update. It is urgent to do so, as this is the only one of 18 socio-economic outcomes that does not have one (or more) indicators on the Productivity Commission’s dashboard even though the National Agreement on Closing the Gap is more than halfway through its 10-year life.

The submission by Aboriginal Housing NT suggests a range of indicators for the essential services that are included in Target 9b but it does not include any for drinking

water safety, which at a minimum could be represented by a combined indicator of H3 and H4 of the NPR. However, this is not possible until the NPR is extended to require all very small water providers to report H3 and H4.

In the meantime, an interim indicator for Target 9b could be derived from the recently launched (updated) Australian Drinking Water Record (Le et al. 2026), as Fisher et al. (2025) did from the original ADWR (Wyrwoll et al. 2022). As noted by Update 1, these include only publicly available data, so that a full national assessment can only be obtained when the NSW and QLD jurisdictions are willing to make their drinking water quality data public.

It should also be noted that Target 9b has two parts – an indicator based on the ADWR could only address the first part, which concerns discrete Aboriginal communities. The second part is concerned with supplying Aboriginal communities with services comparable to those provided to nearby town communities. To make such a comparison for drinking water safety requires nomination of sampling sites that are representative of each community's supply. There is no such sampling program currently on public record and a Commonwealth FOI request for information on the formulation of Target 9b was refused recently.

At an international level, Australia is a signatory to the UN 2030 Agenda for Sustainable Development. Similar compliance data for a restricted number of health-related variables are needed to report on Australia's performance in achieving Sustainable Development Goal 6.1.1 (<https://ourworldindata.org/sdgs/clean-water-sanitation>). How will Australia report its compliance with Guidelines for these substances without all water suppliers providing their data to the NPR?

No data are reported from Australia up to 2024 on the UN SDG6.1 web page (<https://ourworldindata.org/explorers/water-and-sanitation>) . The 2024 snapshot for Australia (<https://www.sdg6data.org/en/country-or-area/australia>) has no data for drinking water target 6.1, but claims 100% of the population is using safely managed drinking water services, even though the metrics for safety of these services are supposed to include freedom from harmful levels of faecal matter (e.g. *E. coli*) and priority toxic chemicals (e.g. arsenic and fluoride). There can be little progress on reporting safety of drinking water at this international level without requiring all jurisdictions to make their relevant data available for this purpose.

About the Author

Dr Ian Fisher was Principal Scientist – Drinking Water for Sydney Water Corporation (SWC) for over 15 years, initially with responsibility for its drinking water quality surveillance. This included designing and implementing SWC's first trace contaminant

monitoring program. He was subsequently foundation Coordinator for the distribution system research program of the national CRC for Water Quality and Treatment, within which he led the development, validation and publication of mathematical models of chlorine reactions in bulk water and with pipe walls.

Ian has also been a Professor of Engineering (Research) at CDU and an Adjunct Professor at WSU. He is currently Director of Watervale Systems, a small company that has continued the modelling development and now provides consulting services to water utilities to achieve chlorine residuals in distribution systems sufficient to control microbiological agents, while keeping disinfection by-products below regulated limits.

References

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