



IPART Independent
Pricing and Regulatory
Tribunal | NSW

Licence compliance under the
Water Industry Competition Act 2006
(NSW)

Annual Compliance Report to the Minister

October 2024

Water »

Acknowledgment of Country

IPART acknowledges the Traditional Custodians of the lands where we work and live. We pay respect to Elders both past and present.

We recognise the unique cultural and spiritual relationship and celebrate the contributions of First Nations peoples.

Tribunal Members

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The Independent Pricing and Regulatory Tribunal

IPART's independence is underpinned by an Act of Parliament. Further information on IPART can be obtained from [IPART's website](#).

Contents

Executive summary	1
1 Licensee compliance in 2023-24	5
1.1 Network operators	5
1.2 Retail suppliers	10
2 Changes in the water industry and operating statistics	11
2.1 The private water sector	11
2.2 Changes in the sector over time	11
2.3 Licences granted, varied or cancelled in 2023-24	12
2.4 The amended WIC Act	15
2.5 Trends and impacts on the development of the industry	16
3 Our role in monitoring licence compliance	18
3.1 Risk-based approach to monitoring compliance	19
3.2 Monitoring compliance during 2023-24	22
A Audits undertaken in 2023-24	25
B Annual operating performance statistics – network operators	26
C Annual operating performance statistics – retail suppliers	28
Glossary	30

Executive summary

This is the Independent Pricing and Regulatory Tribunal's (IPART's) annual report on licence compliance under the *Water Industry Competition Act 2006* (WIC Act) for the 2023-24 financial year.³ It sets out our findings on licence compliance of the network operators and retail suppliers licensed under the WIC Act during 2023-24. It also summarises how the private water industry^a in NSW has changed over the reporting period and our associated compliance activities.

Compliance overview

As in previous years, the compliance performance of most of the 32 licensees under the WIC Act during the reporting period was high. We required fewer audits this year due to the reduced audit frequency granted to some licensees resulting from their good compliance history. Also, fewer new schemes came into operation.

Non-compliances

We audited 12 network operator licences. Four of these had no non-compliances. We identified 8 non-compliances across the remaining 8 licences, but only one of these non-compliances was assessed as material. The remaining 7 non-compliances were non-material.²

12

Network operator
licences audited

- 1 material non-compliance
- 7 other non-compliances
- 4 without non-compliances

The material non-compliance was identified for Aquacell Pty Ltd's, Bligh St scheme. It related to inadequate public and worker safety protections within the treatment area. The remaining non-compliances (non-material) were generally related to incomplete implementation of water quality plans and infrastructure operating plans.

We did not take compliance action against Aquacell to address the material non-compliance as Aquacell took immediate action to address the non-compliance and we considered the risk to public health and safety to be low. Aquacell has reported that they have improved chemical handling procedures and completed plant upgrades to address leaks and reduce spill risks. We will check that the non-compliance has been addressed in Aquacell's next compliance audit. Outside of the audit process, licensees self-reported 2 non-compliances (regarding being a member of an approved ombudsman's scheme) and reported 4 incidents during the reporting period.

^a 'Industry' in this context refers to the supply of recycled water, and/or the treatment and reuse/disposal of sewage by private companies (water utilities) that are regulated by IPART under the *Water Industry Competition Act 2006*.

None of the non-compliances posed an immediate risk to public health or the environment. We did not take enforcement action in relation to any non-compliances this year. However, we will continue to monitor progress to ensure any risk is addressed quickly. We will test the completeness of activities undertaken to address non-compliances in the next round of audits.

We discuss non-compliances in greater detail in Chapter 1 of the report.

Use of recycled water grew steadily over the 12 months to 30 June 2024

The total number of customers receiving recycled water services from a WIC Act licenced scheme has increased by 11% and the volume of recycled water produced by WIC Act licensees increased by 9%.



We have seen an increase in recycled water use in NSW since 2020, indicating an increase in interest and acceptance of recycled water and the private water industry. The NSW Government released the *Greater Sydney Water Strategy (GSWS)* in August 2022. The GSWS aims (among other things) to:

- continue planning for new rainfall-independent supply sources to support growth and to reduce the risk of reaching low dam levels during drought, by investigating recycled water where appropriate
- make much greater use of stormwater and recycled water to cool and green the city and support recreational activities.³

The private water industry remains a key contributor to achieving the aims of the Greater Sydney Water Strategy. This is discussed further in Section 2.1 of this report.



Drinking water production decreased

Drinking water produced by WIC Act licensees decreased this year, mainly because the Sydney Desalination Plant (SDP) did not operate at full capacity for the entire period. When operating to capacity, the SDP supplies Sydney with up to 15% of its drinking water.⁴ We provide the operating statistics in Table B.1 and Table C.1 of this report.

New applications

We processed 4 licence applications: 2 applications for new licences (True Water network and retail licences) and 2 applications to vary current licences (Huntlee's network licence and Altogether Group's retail licence). Of these:

- The 2 True Water licence application assessments were completed during this reporting period.^b
- The 2 Huntlee licence variation applications were assessed during the reporting period but not granted until after the reporting period.

We discuss licence applications further in section 2.3.

Amended WIC Act commenced

The WIC Act was amended by the *Water Industry Competition Amendment Act 2021* to create a new regulatory framework for the private water industry. The amended WIC Act and the new *Water Industry Competition (General) Regulation 2024* (WIC Reg) commenced on 1 March 2024.

The new framework introduces state-wide operator and retailer licences, moving away from scheme-specific licences. These licences are granted by the Minister. Licensed operators have the authority to construct and operate a specified number of schemes of a specified size and type. Licensed retailers are authorised to sell the provision of water and sewerage services to small retail customers. Under the new framework each scheme will have its own approval, separate to the operator and retailer licence. The approvals will be issued by IPART specifying the area of operations, infrastructure locations, infrastructure class, design capacity, and staging of the scheme.

The new framework will also provide for last resort operators to step in and provide essential services should a WIC Act licensee fail. This arrangement provides additional protections for customers of private water utilities. A new deemed customer contract also increases protections for customers.

We have begun transitioning existing licences to the amended WIC Act licensing and approvals framework which will take effect from 1 March 2025. There will be 4 schemes that will no longer require licensing under the WIC regime and 2 schemes will no longer require retail licences.

We discuss the amended WIC Act further in section 2.4.

^b The Minister granted 2 new licences to True Water on 24 October 2023.

Table 1 summarises compliance for WIC Act licences, industry trends and related activities for 2023-2024.

Table 1 Compliance Summary 2023-2024

Item	Result	Comments
No. of licences	32	<ul style="list-style-type: none"> ↑ An increase of 2 from previous year • 20 network operator licences • 12 retail supplier licences
No. of audits	14	<ul style="list-style-type: none"> • 12 Operational audits • 1 New infrastructure audit • 1 Licence plan audit
NCs found through audits	8	<p>Across 8 licences, including one material NC</p> <ul style="list-style-type: none"> • 6 non-material NCs in Altogether group's licences across 7 of their schemes for minor deficiencies in fully implementing its water quality management systems • 2 NCs in Aquacell Pty Ltd's schemes: <ul style="list-style-type: none"> - One non-material NC for Kurrajong scheme for not fully implementing its sewage management plan related to inadequate sample transport procedures. - One material non-compliance for Bligh St scheme for not fully implementing its infrastructure operating plan related to inadequate public and worker safety protections within the treatment area.
NCs found by IPART	2	CPE Barangaroo, relating to late insurance report submission.
Self-identified NCs	2	2 in Kooragang Industrial Water Scheme (KIWS) regarding membership of an approved ombudsman scheme.
Self-identified incidents	4	2 for sewage overflows and 2 for water quality.
No. of new licence applications processed	2	<ul style="list-style-type: none"> • One True Water network operator licence • One True Water retailer licence.
No. of licence variation applications processed	2	2 for Huntlee scheme (both granted after the reporting period).
Customers experiencing an uncontrolled wastewater overflow	8	One customer at Cooranbong, one customer at Huntlee, one customer at Pitt Town and 5 customers at Box Hill.

The rest of this report discusses licence compliance in 2023-24, changes in the industry and IPART's role in compliance monitoring in more detail.

1 Licensee compliance in 2023-24

Most licensees demonstrated a high level of compliance with their licence conditions in 2023-24 through operational audits. Four out of the 12 audited network operator licences had no non-compliances. Seven licences had non-material non-compliances, and one licence had a material non-compliance.⁵ The non-compliances were generally related to incomplete implementation of water quality plans and infrastructure operating plans.

The Bligh St scheme was found to have a material non-compliance. The auditor found there were inadequacies in meeting current safety standards. Specifically, there were slow drip leaks of sewage and chemicals, and inadequate bunding and labelling of chemicals observed.

The licensee advised that it addressed the audit findings within a month of the auditor advising its audit findings. We consider that this finding did not warrant enforcement action and will follow up on the non-compliance rectification actions at the next operational audit. We discuss the non-compliances further in section 1.1.1.

The sections below provide detail on the licensed network operators' and retail suppliers' relevant activities during the year, their individual compliance performance and how they addressed any non-compliance findings.

We are reporting non-compliances identified in operational audits or reported by the licensee, rather than issues that may otherwise develop into non-compliances if not corrected.^c

1.1 Network operators

Table 1.1 lists the 20 network operators and their non-compliances and how they were identified.

We audited 12 of the 20 network operators licensed under the WIC Act during the year. Of the licensees we did not audit:

- 2 were non-operational during the period^d,
- 4 are audited every second year because they have previously established a high level of compliance,^e and
- 2 schemes, Darling Quarter and Narara were not audited as they will not be regulated under the WIC Act framework and will instead be regulated under the *Local Government Act 1993*. The Narara scheme did not produce recycled water during the period, and we consider it to be a low risk scheme. The Darling Quarter scheme was audited in 2023 and achieved a high level of compliance for the 2022-23 audit period. In accordance with IPART's Audit Guideline (WICA)⁶, we reduce compliance audit frequency for schemes that maintain a high level of compliance. Therefore, we did not audit these schemes during 2023-24.

^c Prior to 2015-16 we reported on potential non-compliances identified in licence plans, new infrastructure and operational audits that would have become non-compliances if the issue was not addressed prior to commercial operation.

^d Glossodia and True Water schemes had not begun operations during the reporting period.

^e Orica, Rosehill Network, Kooragang Industrial Water Scheme and the Sydney Desalination Plant are currently on reduced audit frequency and were not audited in the reporting period.

- 4 schemes - Orica, Rosehill Network, Kooragang Industrial Water Scheme and the Sydney Desalination Plant are audited every second year because they have previously established a high level of compliance. They were not audited in this reporting period.^f

1.1.1 Self-reported non-compliances

We simplified the way licensees report self-identified non-compliances when we updated the [Network Operator's Reporting Manual and Retail Supplier's Reporting Manual under Water Industry Competition Act 2006 \(Reporting Manual\)](#) in April 2022. Last year we saw an increase in self-reported non-compliances. This year licensees continued to proactively report potential issues, however there was a decrease in the number of self-identified non-compliances.

For this reporting period one licensee self-identified an additional 2 non-compliances (regarding being a member of an approved ombudsman scheme). The licensee concerned does not have any small retail customers and will not be required to belong to an ombudsman scheme after 1 March 2025. As there is no material impact on customers, we have decided not to undertake enforcement action in relation to this non-compliance.

One licensee also self-reported a non-compliance in relation to a licensee not providing an insurance expert's report by the due date as directed. We were aware of this non-compliance and decided that enforcement action was unwarranted in this case as the report was subsequently provided.

1.1.2 Self-reported incidents

Licensees also reported 4 incidents during the reporting period. Reportable incidents include events in the conduct of Licensee's activities that threaten, or could threaten, water quality, public health or safety. An incident doesn't always involve a non-compliance with the licence.

Incident reports include immediate reporting and follow-up by the licensee to provide sufficient information for us and other regulators to understand whether there is an imminent risk that needs to be managed. We did not consider any of the reported incidents to be licence non-compliances requiring further action. They did not impact on water quality, public health or safety.

We will follow up on all reported incidents in the next round of audits to ensure that the licensees' responses were appropriate and any outstanding risks are being addressed by the licensees.

^f Orica, Rosehill Network, Kooragang Industrial Water Scheme and the Sydney Desalination Plant are currently on reduced audit frequency and were not audited in the reporting period.

Table 1.1 Compliance for network operator licenses 2023-2024

Licensee	Scheme	Non-compliance identified by			Total
		Licensee	Audit	IPART	
Rosehill Network Pty Ltd	Fairfield-Rosehill	0	NA	0	NA
Aquacell Pty Ltd	1 Bligh St	0	1	0	1
Veolia Water Solutions and Technologies (Australia) Pty Ltd (VWST)	Darling Quarter	0	NA	0	NA
Sydney Desalination Plant Pty Ltd	Sydney Desalination Plant	0	NA	0	NA
Altogether Pitt Town Pty Ltd	Pitt Town	0	1	0	1
Orica Australia Pty Ltd	Orica groundwater scheme	0	NA	0	NA
Altogether Central Park Pty Ltd	Central Park	0	1	0	1
Altogether Discovery Point Pty Ltd	Discovery Point	0	1	0	1
CPE Barangaroo Recycled Pty Ltd	Barangaroo	0	0	1	1
Altogether Huntlee Pty Ltd	Huntlee	0	1	0	1
Aquacell Pty Ltd	Kurrajong	0	1	0	1
Altogether Cooranbong Pty Ltd	Cooranbong	0	1	0	1
Catherine Hill Bay Water Utility Pty Ltd	Catherine Hill Bay	0	0	0	0
Altogether Operations Pty Ltd	Box Hill North	0	1	0	1
Kooragang Water Pty Ltd	KIWS	1	NA	0	1
Narara Ecovillage Co-operative Ltd	Narara	0	NA	0	NA
Altogether Operations Pty Ltd	Shepherds Bay	0	0	0	0
Altogether Operations Pty Ltd	Glossodia	NA	NA	NA	NA
Kyeema Water Pty Ltd ⁹	Gundaroo	0	0	0	0
True Water DTR Pty Ltd	Ashbourne	NA	NA	NA	NA
Total		1	8	1	10

Note: NA means that no audit was undertaken during this reporting period.

Source: IPART analysis.

1.1.3 Network operator that had material non-compliance

Bligh Street scheme material non-compliance

Requirement to implement infrastructure operating plans (WIC Reg Sch 1 cl. 6(2)a): The auditor found that Aquacell had failed to implement its infrastructure operating plan in relation to the maintenance of infrastructure and associated equipment. Several inadequacies in containment of sewage and chemicals and labelling of chemicals collectively resulted in a material non-compliance.

⁹ Formerly known as Kyeema Wastewater Pty Ltd.

While each inadequacy was considered small, if left untreated, the cumulative risk of sewage, chemical or liquid spills, substandard containment of those spills, and of first responders or persons entering the site and being unaware of the nature of those liquids or chemicals was material. While we are concerned about these inadequacies, we note that the Bligh St scheme is located in a basement of a building and is unstaffed unless an alarm is triggered. The risk to workers was low and any spills and leaks will not impact public safety.

Aquacell reports that it has completed the following works to address the issue:

- Leaking pipework has been replaced.
- All chemical tanks are now bunded and an additional floor barrier has been installed at the entrance to the plant room.
- All chemical tanks have a laminated Safety Data Sheets (SDS) attached to them. There is also a hard copy of each SDS kept in a folder at the entry to the plant room.
- The chemical manifest for the building is held at security in case it is required for emergency services.

In light of Aquacell's response and the low risk to public health we have not taken enforcement action. This scheme will not be regulated under the WIC Act framework once transition to the new framework is complete by 1 March 2025. We will follow up on Aquacell's actions to provide assurance that the infrastructure is now fully maintained and fit for purpose before 1 March.

1.1.4 Network operators that had non-material non-compliances

Altogether Group

The audit identified 6 non-material non-compliances spread across 6 of Altogether's 7 operating schemes.^h

Requirement to implement water quality plans (WIC Reg Sch 1 cl. 7(4)a): In general, the auditor found that Altogether Group had demonstrated a high level of competence in implementing its water quality plans and had minor deficiencies with implementing some elements of the drinking water guidelines and the recycled water guidelines.

Altogether Group's Drinking Water Quality Plan (DWQP) and Recycled Water Quality Plan (RWQP) had not been fully implemented across all relevant operating schemes. The auditor found non-material non-compliances against elements of the *Australian Drinking Water Guidelines* (ADWG) for the Central Park, Cooranbong, Discovery Point, and Huntlee schemes and the *Australian Guidelines for Water Recycling* (AGWR), for the Box Hill, Central Park, Cooranbong, Discovery Point, Huntlee, and Pitt Town schemes.

The matters of concern included:

- Minor CCP operational deviations which require Altogether to re-test CCP's at several sites
- CCP inspection methodology for storage tanks at the land and housing schemes is inadequate to reliably identify a critical limit breach
- Isolated preventative maintenance tasks missed or delayed

^h The auditor did not make findings against the Shepherds Bay scheme and Glossodia is not operational at the time of writing this report.

- Contradictory instructions in procedures relating to management of customer complaints
- Lack of signage at Huntlee Park (recycled water irrigation site)
- pH probe calibration solutions not tracked for expiry date.

While we consider these matters to be relatively minor we will follow up on the actions that Altogether Group has taken to address these issues at the next annual audit of these schemes to ensure an ongoing high level of compliance.

Kurrajong

Requirement to fully implement sewage management plans (WIC Reg Sch 1 cl. 14(3)a): The auditor identified one non-material non-compliance at Kurrajong. The transport procedure for samples taken to monitor the treatment processes did not reliably ensure the samples were kept within their recommended temperature and time boundaries enroute to the analytical laboratory, which resulted in a non-compliance. This was considered non-material due the nature of the samples being analysed. We will follow up with the licensee in the next operational audit to review its improved procedures.

Barangaroo

Failure to respond to a request for information (Licence condition B2.6): IPART identified one non-material non-compliance in relation to CPE Barangaroo's insurance requirements. We requested CPE Barangaroo provide an insurance expert's report to ensure that adequate insurance remained in place after transfer of ownership of the Barangaroo scheme. CPE Barangaroo did not provide the report by the due date.

CPE Barangaroo has since provided the report and upgraded its environmental liability insurance in line with our recommendation. We decided not to take enforcement action in relation to this non-compliance.

11.5 Correction to the 2023 Annual Compliance Report to the Minister

Kyeema Water (KW)ⁱ

The 2022-23 audit findings and recommendations in relation to the Water Quality Plan (WQP) for Kyeema's Gundaroo scheme, as reported in the *2023 Annual Compliance Report to the Minister - licence compliance under the WIC Act*, should be disregarded due to an error in the audit scope.

The 2022 operational audit identified non-material non-compliances with the requirement to implement the WQP. We have treated the audit findings from the 2022 compliance audit that relate to the WQP as opportunities for improvement (OFI). This is because the findings themselves are valid observations about how Kyeema's treatment process could be improved, but do not constitute non-compliances as there was no requirement to have a WQP. We are further addressing the error in the transitioning of Kyeema's operator licence under the amended WIC Act.

ⁱ Formerly known as Kyeema Wastewater Pty Ltd.

Table 1.2 Compliances for retail supplier licences 2023-24

Licensee	Scheme	Non-compliance identified by			
		Licensee	Audit	IPART	Total
Kyeema Water Pty Ltd	Gundaroo	0	0	0	0
Sydney Desalination Plant Pty Ltd	Sydney Desalination Plant	0	0	0	0
Solo Water	Catherine Hill Bay	0	0	0	0
Aquacell Pty Ltd	Blight St & Kurrajong	0	0	0	0
Orica Australia Pty Ltd	Orica groundwater scheme	0	0	0	0
True Water DTR Pty Ltd	Ashbourne	0	0	0	0
Kooragang Water	KIWS	1	0	0	1
Narara Ecovillage	Narara	0	0	0	0
Altogether Group Pty Ltd	Box Hill, Central Park, Cooranbong, Discovery Point, Huntlee, Shepherds Bay, Pitt Town	0	0	0	0
AquaNet Sydney	Fairfield - Rosehill	0	0	0	0
CPE Barangaroo Recycled Water	Barangaroo	0	0	1	1
Veolia Water Solutions and Technologies (Australia) Pty Ltd (VWST)	Darling Quarter	0	0	0	0
Total		1	0	1	2

Ten of the 12 retail suppliers had no non-compliances. Kooragang Water identified that it was non-compliant with the requirement to be a member of an approved ombudsman scheme as set out in section 1.1.1 above. This was a breach of their retail licence as well as their network operator licence. Kooragang Water, as well as SDP, will not require retailer licences in the amended WIC regime as they do not have small retail customers.

The non-compliance relating to CPE Barangaroo not providing an insurance expert's report by the due date identified in section 1.1.4 above was a breach of their retailer licence as well as their operator licence.

Because of the lower risk associated with retail licence compliance, we generally undertake audits when information arises that indicates an issue of concern. We did not undertake any audits of retail licenses this year. IPART can undertake audits at any time to confirm licensees' compliance with their regulatory requirements.⁷

2 Changes in the water industry and operating statistics

In the 16 years since the WIC Act commenced, the private water industry in NSW has grown steadily. In this chapter, we provide an overview of the changes in the industry and the issues that continue to impact the development of the private water market and recycled water market in particular.

2.1 The private water sector

The WIC Act was introduced as part of the NSW Government's strategy for a sustainable water future to harness the innovation and investment potential of the private sector in the water and wastewater industries.⁸

Over the ensuing years, the market for recycled water use has grown, and continues to expand. This year has seen an increase in customer numbers and recycled water volumes reported to IPART as the established schemes continue to grow.

2.2 Changes in the sector over time

Since 2008 the Minister has granted 29 network operator licences and 18 retail supplier licences. The Minister has cancelled 9 network operator licences and 6 retail supplier licences, each at the licensee's request.⁹ The number of retail supplier licences is lower than network operator licences because retail suppliers tend to hold one licence across multiple schemes.^j

Figure 2.1 and Figure 2.2 show trends in the number of licences and the number of customers serviced by licensees. During the reporting period we completed our assessment of 2 licence applications. The Minister^k granted both licences; one network operator licence and one retail supplier's licence. A dip in recycled water use in 2022-23 corresponds with a reduction in licences as schemes moved to different regulatory frameworks. For example, Sydney Water assumed operations at the Bingara Gorge Recycled Water Plant in mid-2022.¹⁰

We have observed a steady upward trend in the number of customers and the volume of recycled water supplied over the last 12 years. This growth reflects the maturation and successful completion of stages of the larger schemes. We discuss the increase in licence numbers in section 2.5.

^j When a new scheme is approved by the Minister (as a network operator's licence), it is added to the existing retail supplier's licence under a separate application to vary the retail supplier's licence.

^k At the time, the Minister for Lands and Water.

2.3 Licences granted, varied^l or cancelled in 2023-24

Assessment of WIC Act licences is complex and requires consideration of possible impacts on customers, communities, the environment and public health. While some licence applications provide the necessary information when submitted, most licence applications we receive are incomplete, and we seek further information from the applicants. Some licence applications require changes to scheme design, additional information or amended environmental assessment reports that result in resubmission of applications. We undertake a high level of scrutiny and make a recommendation to the Minister to grant a licence when we are satisfied that all the requirements for operating safely under a licence can be met. To do so, we ensure that the schemes are safe, particularly where recycled water is being supplied to residential customers for non-drinking purposes. We also ensure that small retail customers are protected from schemes that may not be viable in the long term.

The Minister granted 2 new licences this year. In addition, we processed 2 licence variation applications and made recommendations for the Minister to vary these 2 licences. However, commencement of the amended WIC Act before the Minister had granted the varied licences resulted in the variations to the Huntlee scheme approval being granted by IPART instead.^m

Overall, there have been fewer licence applications submitted to us this year. The delayed commencement of the amended WIC Act is likely to have affected the number of applications received. We have received several enquiries regarding new applications now that the regulatory environment is more certain under the amended WIC Act.

Table 2.1 and Table 2.2 summarise the network operators and retail suppliers licensed under the WIC Act as of 30 June 2024, and the activities they were licensed to undertake.

Table 2.1 Network operator licences as of 30 June 2024

Date licence first granted	Licensee	Scheme	Recycled water	Drinking water	Sewage
27 Apr 2009	Rosehill Network Pty Ltd	Fairfield-Rosehill	✓		
2 Feb 2010	Aquacell Pty Ltd	1 Bligh St			
24 Jun 2010	Veolia Water Solutions and Technologies (Australia) Pty Ltd	Darling Quarter ^a	✓		
9 Aug 2010	Sydney Desalination Plant Pty Ltd (SDP)	Sydney Desalination Plant		✓	
11 Nov 2010	Altogether Pitt Town Pty Ltd ^b	Pitt Town			✓
23 Apr 2012	Orica Australia Pty Ltd	Orica groundwater scheme	✓		
4 Jan 2013	Altogether Central Park Pty Ltd ^b	Central Park	✓	✓	✓
4 Dec 2013	Altogether Discovery Point Pty Ltd ^b	Discovery Point	✓	✓	✓
28 Feb 2015	Lend Lease Recycled Water (Barangaroo South) Pty Ltd	Barangaroo	✓		✓

^l Does not include 5-year licence reviews, which is a statutory obligation under the WIC Act.

^m This approval was granted outside the reporting period covered by this report, in August 2024.

Date licence first granted	Licensee	Scheme	Recycled water	Drinking water	Sewage
3 Mar 2015	Altogether Huntlee Pty Ltd ^b	Huntlee	✓	✓	✓
26 July 2015	Aquacell Pty Ltd	Kurrajong	✓		✓
6 Aug 2015	Cooranbong Water Pty Ltd ^b	Cooranbong	✓	✓	✓
22 Mar 2016	Catherine Hill Bay Water Utility Pty Ltd	Catherine Hill Bay	✓	✓	✓
12 May 2016	Altogether Operations Pty Ltd ^b	Box Hill North	✓		✓
4 July 2017	Narara Ecovillage Co-operative Ltd	Narara	✓	✓	✓
13 Oct 2017	Altogether Operations Pty Ltd ^b	Shepherds Bay	✓	✓	✓
26 June 2020	Altogether Operations Pty Ltd ^b	Glossodia	✓		✓
25 Sep 2020	Kyeema Water Pty Ltd	Gundaroo			✓
4 Nov 2022	Kooragang Water Pty Ltd	Kooragang	✓		
24 Oct 2023	True Water DTR Pty Ltd	Ashbourne			✓

Note: The WIC Act licensees authorised to provide drinking water (other than SDP) resell the drinking water sourced from Sydney Water and Hunter Water.

a. Also known as Darling Walk.

b. Each licensee is a subsidiary company of Altogether Group Pty Ltd.

Source: IPART, [Register of licences granted under the WIC Act](#).

Table 2.2 Retail supplier licences as of 30 June 2024

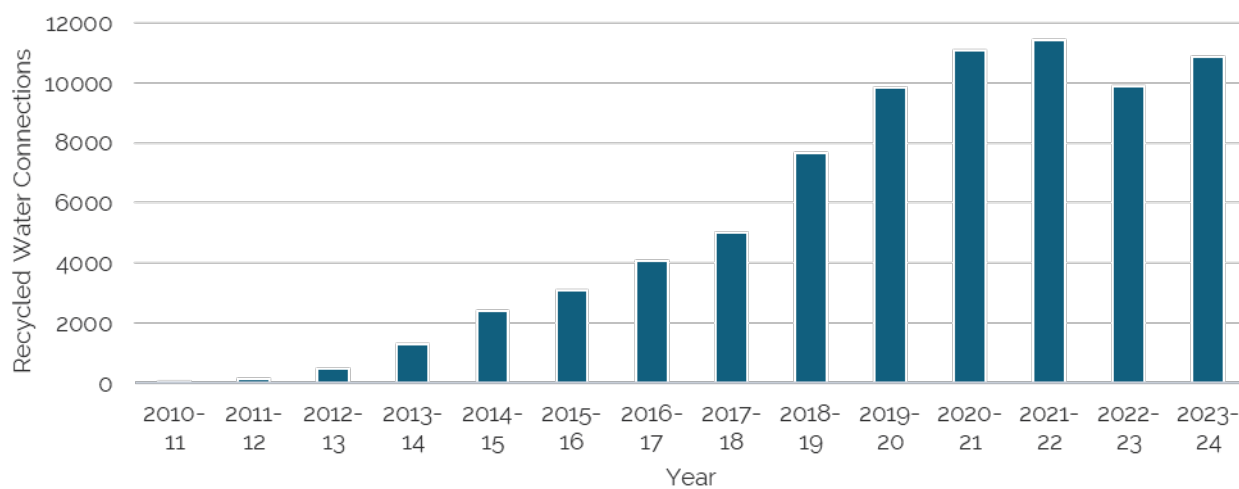
Date licence first granted	Licensee	Scheme	Recycled water	Drinking water	Sewerage
2 Feb 2010	Aquacell Pty Ltd	1 Bligh Street	✓		
26 July 2015	Aquacell Pty Ltd	Kurrajong			✓
10 Mar 2010	AquaNet Sydney Pty Ltd	Fairfield-Rosehill	✓		
24 Jun 2010	Veolia Water Solutions and Technologies (Australia) Pty Ltd	Darling Quarter	✓		
9 Aug 2010	Sydney Desalination Plant Pty Ltd (SDP)	Sydney Desalination Plant		✓	
23 Apr 2012	Orica Australia Pty Ltd	Orica groundwater scheme	✓		
3 July 2012	Altogether Pitt Town Pty Ltd	Pitt Town	✓		✓
4 January 2013	Altogether Central Park Pty Ltd	Central Park	✓	✓	✓
4 December 2013	Altogether Discovery Point Pty Ltd	Discovery Point	✓	✓	✓
6 August 2015	Altogether Cooranbong Pty Ltd	Cooranbong	✓	✓	✓
3 March 2015	Altogether Huntlee Pty Ltd	Huntlee	✓	✓	✓

Date licence first granted	Licensee	Scheme	Recycled water	Drinking water	Sewerage
12 May 2016	Altogether Operations Pty Ltd	Box Hill North	✓		✓
13 October 2017	Altogether Operations Pty Ltd	Shepherds Bay	✓	✓	✓
26 June 2020	Altogether Operations Pty Ltd	Glossodia	✓		✓
13 July 2015	Lend Lease Recycled Water (Barangaroo South) Pty Ltd	Barangaroo	✓	✓	✓
22 Sept 2016	Solo Water Pty Ltd	Catherine Hill Bay	✓	✓	✓
4 July 2017	Narara Ecovillage Co-operative Ltd	Narara	✓	✓	✓
25 Sep 2020	Kyeema Water Pty Ltd	Gundaroo			✓
4 Nov 2022	Kooragang Water Pty Ltd	Kooragang	✓	✓	
24 Oct 2023	True Water DTR Pty Ltd	Ashbourne			✓

Note: The WIC Act licensees authorised to provide drinking water (other than SDP) resell the drinking water sourced from Sydney Water and Hunter Water.

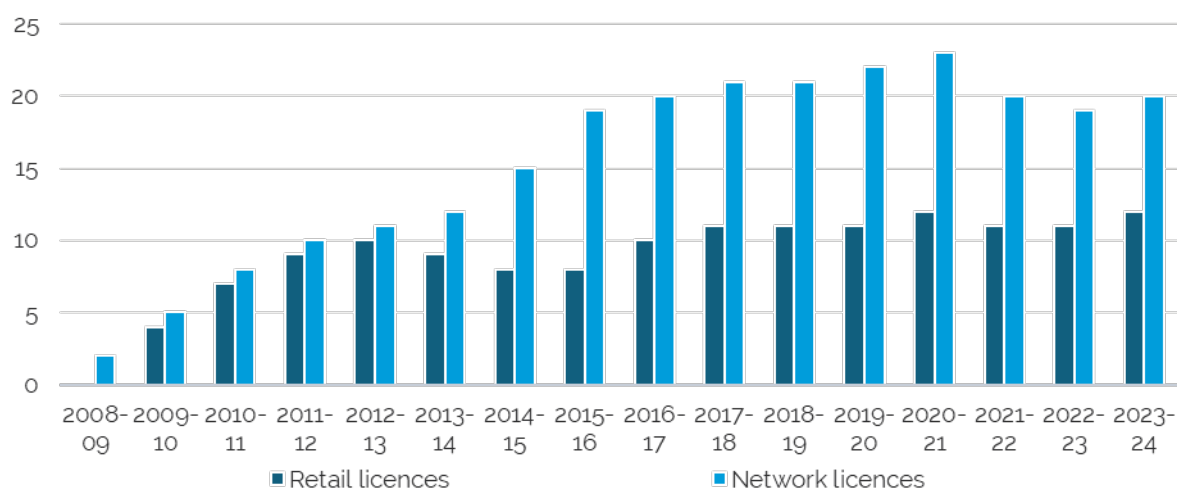
Source: IPART, [Register of licenses granted under the WIC Act](#) .

Figure 2.1 Recycled water connections since 2010



Source: IPART analysis

Figure 2.2 Number of retail and network licences since 2008



Source: IPART analysis

2.4 The amended WIC Act

The WIC Act was amended by the *Water Industry Competition Amendment Act 2021* to create a new regulatory framework for the private water industry. The amended WIC Act and the new *Water Industry Competition (General) Regulation 2024 (WIC Reg)* commenced on 1 March 2024.

The new framework introduces state-wide operator and retailer licences, moving away from scheme-specific licences. These licences are granted by the Minister.¹¹ Operators have the authority to construct and operate a specified number of schemes of a specified size and type.¹² Retailer licences enable the provision of water and sewerage services to small retail customers.¹³

Under the new framework each scheme has its own approval, issued by IPART specifying the area of operations, infrastructure locations, infrastructure class, design capacity, and staging of the scheme.¹⁴ Further approvals are required to commence operations once construction is completed. Both licences and approvals can be amended to accommodate changes in schemes or infrastructure.¹⁵

An important addition is the requirement for last resort arrangements for essential services whereby a last resort provider is designated by the Minister to take over in the case of a failed licensee, for example through insolvency.¹⁶ The Contingency Plan is required which sets out the information needed by the Last Resort Provider to operate the infrastructure and continue to provide the essential services.¹⁷

The new framework also enhances customer protection and service standards for small retail customers through the establishment of a deemed customer contract,¹⁸ which aligns with the standard contracts used by Sydney Water and Hunter Water.

Additionally, the framework strengthens IPART's oversight capabilities by expanding its auditing and reporting functions and increasing its investigative powers and penalties for violations.¹⁹

Since 1 March 2024, we have been transitioning existing licences to instruments under the amended WIC Act. Some small lower risk schemes will no longer be regulated under the WIC Act and will be regulated by local councils under the *Local Government Act 1993* in future.

2.5 Trends and impacts on the development of the industry

Water security and sustainable water management remain significant challenges for NSW, intensified by climate change. The NSW Government has established the *Greater Sydney Water Strategy* (GSWS) and the *Lower Hunter Water Security Plan* (LHWSP) to enhance sustainable and resilient water services in these regions. These plans aim to increase rainfall-independent water supply and recycled water use, effectively manage limited resources, and maintain system resilience against climate change.

These aims integrate with the aims of the WIC Act, namely *'to encourage competition in relation to the supply of water and the provision of sewerage services and to facilitate the development of infrastructure for the production and reticulation of recycled water; and for other purposes'*.²⁰

However, a number of challenges continue to impact the ability of businesses to develop and maintain viable private recycled water schemes in NSW. As the NSW Government and the industry find ways to address some of these challenges we expect greater growth of the recycled water market and increased competition over coming years.

2.5.1 Purified recycled water for drinking

The development of markets for recycled water is also impacted by the cost of constructing separate pipework to deliver recycled water separately to drinking water. In jurisdictions around the world where recycled water is supplied for both non-drinking and drinking purposes, this constraint has been reduced.

The newly constructed Purified Recycled Water (PRW) Demonstration Plant and Discovery Centre opened in October 2023 and is one of Sydney Water Corporation's actions under the Greater Sydney Water Strategy. The facility is designed to demonstrate the performance, cost effectiveness and reliability of the treatment technology used to treat recycled water to a quality suitable to supplement Sydney's raw water sources which can then be treated to produce drinking water and potentially pave the way for an expanded market for recycled water in NSW.

This facility is intended to help build community understanding and acceptance of PRW, while enabling Sydney Water Corporation's employees to build their capability and operational experience with the technology. Water produced at this PRW Demonstration Plant does not contribute to Sydney's drinking water supply. We note that any future decision to include PRW as part of Sydney's drinking water supply would involve community consultation and further approvals.

2.5.2 Introduction of developer charges and impact on private water market

Developer charges are location-specific charges that developers must pay to cover the costs of providing, upgrading and augmenting infrastructure, including water infrastructure to support growth in NSW. Water infrastructure developer charges play a crucial role in limiting the increases in water bills for existing customers as Sydney and Hunter populations grow.

Water infrastructure developer charges have been in place since 1995 but were set to zero by Ministerial direction in 2008 for Sydney and Hunter Water areas. In 2021 the then Treasurer began a process of phased re-introduction of non-zero developer charges. Since then, Sydney Water Corporation and Hunter Water Corporation have published and consulted on Development Servicing Plans which set water infrastructure developer charges.

Given the phasing process over 4 years, it is too early to assess the full impact of this policy change. However, we expect that these non-zero developer charges will provide an opportunity for the private water schemes to offer services to developers at a price that competes with developer charges for water infrastructure. Greater depth in the water utility market should facilitate the delivery of the water and sewerage infrastructure needed to underpin growth, particularly in the urban fringes of Sydney and Newcastle.

2.5.3 Water balance and contingency for excess recycled water

An inability to discharge excess recycled water to nearby waterways or to find other reliable end uses may impact the viability of some potential stand-alone recycled water systems. Managing excess recycled water can be a challenging issue at some recycled water schemes where the production of recycled water exceeds the demand for recycled water at the end use point. This has continued to be a challenge for some potential new schemes during 2023-24.

Existing operators have found solutions although they often come at some cost. For example, one scheme has constructed a pipeline to deliver excess recycled water to a Council sewage treatment plant for disposal. Another licensee has offered excess recycled water to off-site landholders at reduced cost during times of high supply. Another option is to obtain licences to discharge excess recycled water to the environment or irrigate to unused land.

3 Our role in monitoring licence compliance

Licensees are responsible for complying with the conditions of their licence and other obligations under the WIC Act and WIC Regulation. Our aim in monitoring and reporting on the extent of their compliance with these obligations is to ensure the provision of safe, reliable water and sewerage services to their customers. We achieve that aim by holding licensees accountable for their compliance performance and encouraging a culture of full compliance. We also seek to encourage compliance by educating and informing licensees, by facilitating engagement between licensees and other stakeholders or regulators and engaging directly with licensees on issues of concern.

The Minister or IPART may take enforcement action against any licensee that fails to comply with its obligations.²¹ Such enforcement action may include imposing a monetary penalty or requiring the licensee to take certain actions. Recent amendments to the WIC Act have expanded the actions IPART and the Minister may take in response to a contravention of the Act or regulations.²²

The following box summarises the WIC Act and IPART's role.

Box 3.1 About the WIC Act and IPART's role

The WIC Act commenced in August 2008. Its stated aims are to encourage competition in relation to the supply of water and the provision of sewerage services, to facilitate the development of infrastructure for the production and reticulation of recycled water, to make provision for the continuity of essential services provided by the industry, and to establish an access regime for significant water industry infrastructure.²³

The WIC Act establishes a licensing, approval and compliance regime for water and sewerage service providers that are not public water utilities. We administer this regime on behalf of the Ministerⁿ and make recommendations to the Minister to license new operators or retailers. We also approve new schemes. Where necessary we take enforcement action to address compliance issues.

We determine pricing for services provided by declared monopoly suppliers (such as SDP) and conduct periodic reviews of pricing policies in respect of such services, where the Minister refers those matters to us.

Our role in monitoring licensees' compliance protects public health, public safety, consumers and the environment, and encourages competition in the market by maintaining market confidence and integrity.

ⁿ Presently the Minister for Water is the Minister administering the WIC Act.

Currently we monitor compliance with the conditions of a licensee's network operator's or retail supplier's licence. As required under the amended WIC Act, these licences will transition to the new framework of state-wide operator and retailer licences and scheme-level approvals by 1 March 2025. We will then monitor compliance with the conditions of the new instruments under the amended WIC Act and new WIC Reg.

The sections below outline our risk-based approach to monitoring compliance under the WIC Act and the number and type of audits undertaken this year as part of this approach.

3.1 Risk-based approach to monitoring compliance

Our approach includes a range of proactive and responsive measures such as:

- a risk-based independent audit program^o
- investigating incidents, complaints or inadequacies identified through audits or other means
- requiring licensees to immediately report incidents^p
- requiring licensees to submit annual compliance reports, including
 - non-compliance exception reporting (i.e. requiring the licensee to report only non-compliances, instead of reporting against all licence conditions)
 - declarations for maintaining financial capacity and adequate insurance
- proactive engagement with other regulators.

We aim to keep regulated entities accountable in accordance with their regulatory requirements. Compliance is the responsibility of the regulated entities, and we encourage licensees to strengthen their compliance culture.

3.1.1 Independent audit program

This year licensees conducted one new infrastructure audit, one licence plan audit and we initiated 12 operational audits for specified licensees. In our compliance monitoring and enforcement role, we continued to hold licensees accountable for their compliance performance using a risk-based auditing regime and enforcement actions where appropriate.

Our primary objective is to ensure safe, reliable water and sewerage services. We do this by fostering a strong compliance culture within the regulated entities. We are mindful of this objective when deciding how to address instances of non-compliance. A high level of compliance supports the WIC Act's dual objectives of competition and development of the recycled water market by ensuring that market participants (WIC Act licensees and public water utilities) can compete on a level playing field, and the community feels confident in using recycled water for non-drinking purposes.²⁴

^o We focus on licence conditions which seek to manage the biggest risks to safety, public health, customers, consumers and the environment and on licensees with poor records of compliance. We also reduce audit frequency or scope for licensees who demonstrate good compliance.

^p We note that incidents may not necessarily be licence non-compliances.

To monitor compliance of licensees, we conduct audits of licence conditions and assess whether licensed schemes are constructed, operated and maintained in a manner that effectively manages the risks to public health, the environment and consumers.

We continued to proactively monitor and enforce WIC Act licensees' compliance with their licence conditions. We expect licensees to be proactive in identifying potential problems and to work with us to resolve issues and minimise any risks posed by their activities.

Operational audits: We monitor licensees' compliance with the WIC Act, the WIC Regulation and their licence conditions through periodic, risk-based operational audits.⁹ We initiate the audit and the licensee selects independent auditors from a panel of auditors that we pre-approve to undertake audits.

Before licensees commence commercial operation, we also require them to undertake pre-operational audits – namely, new infrastructure audits and licence plan audits.





New infrastructure audits: These audits are undertaken prior to the Minister granting commercial operation, to determine if the infrastructure is safe to operate, and to check that the new infrastructure complies with all licensing and legislative requirements. A network operator must pass its new infrastructure audit before the Minister can grant approval for the licensee to commence commercial operation.²⁵ These audits apply to network operator's licences.

Licence plan audits: These audits review the adequacy of a licensee's water quality, sewage management, infrastructure operating and retail supply management plans. Licence plan audits are undertaken prior to commencing commercial operation, as directed by IPART or in response to a significant change to the plan(s).²⁶ These audits apply to both network operator's and retail supplier's licences.

Auditors must undertake all audits in accordance with our [audit guidelines](#). The audit grades from the audit guidelines applicable this year are presented in [Figure 3.1](#).

⁹ For more information refer to our [Audit Guidelines](#).

Figure 3.1 WIC Act audit grades

Grades of compliance	Description
 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: IPART Audit Guideline – WIC Act, July 2020, pp 10-11.

Where relevant, we re-audit any licence conditions where a licensee was previously found to be non-compliant to check that the licensee has rectified the non-compliances. For high-risk non-compliances, we may require a re-audit or immediate action.

Audit findings inform our decisions on matters of compliance with licensees' legal obligations. However, we may consider a range of information before deciding whether we are satisfied that a non-compliance has occurred and the materiality of the non-compliance. We may reach a different conclusion from an auditor on the matter of compliance or materiality.

3.1.2 Immediate incident reporting

Licensees must immediately report to IPART incidents that occur in the conduct of their activities that threaten, or could threaten, water quality, public health or safety, in accordance with the relevant reporting manual. A reported incident may not necessarily involve licence non-compliances.

This year, we received 4 immediate incident reports from licensees.

We did not consider any of the reported incidents to be licence non-compliances requiring further action. We assessed that these incidents did not impact on water quality, public health or safety, and so have not reported on them in this annual report.

3.1.3 Annual reporting and non-compliance reporting

In addition to immediate incident reporting, licensees are required to submit an annual compliance report to IPART by 1 September each year in accordance with our [reporting manual](#). Each licensee's annual compliance report is to include information on any non-compliance with its licence conditions, and declarations for maintaining financial capacity and adequate insurance.

Licensees must declare that they have maintained insurance arrangements appropriate for the nature and size of the activities under their licence and provide certificates of currency for key insurances and details of material changes made during the year.

Licensees that provide small retail customers with essential services (potable water or sewage services) must also include a statement of financial capacity.

Licensees are also required to immediately report all non-compliances that could potentially have a serious impact on water quality, continuity of supply, public health, safety, other licensees or the Government's policy objectives.

3.1.4 Engagement with other regulators

We work closely with NSW Health, seeking advice on matters that may affect public health and facilitating NSW Health's input on key audits, risk assessments undertaken by licensees and for their licence plans.

We also co-ordinate with other regulators where our licensing or compliance monitoring function identifies issues related to their area of expertise or responsibility. This includes:

- The Water Group of the NSW Department of Climate Change, Energy, the Environment and Water (DCCEE)
- NSW Fair Trading and the Building Commission NSW
- SafeWork NSW
- Fire and Rescue NSW
- NSW Environment Protection Authority
- Local councils.

3.2 Monitoring compliance during 2023-24

We employed a range of compliance tools to keep regulated entities accountable and to consider the risk associated with their activities and the expected level of compliance during 2023-24. Further information on these tools is in the [IPART *Compliance and Enforcement Policy*](#).

3.2.1 Audits undertaken

Independent auditors completed a total of 12 operational audits, one licence plan audit and one new infrastructure audit during or covering the reporting period. A detailed breakdown of the types of audits undertaken is shown in Appendix A.

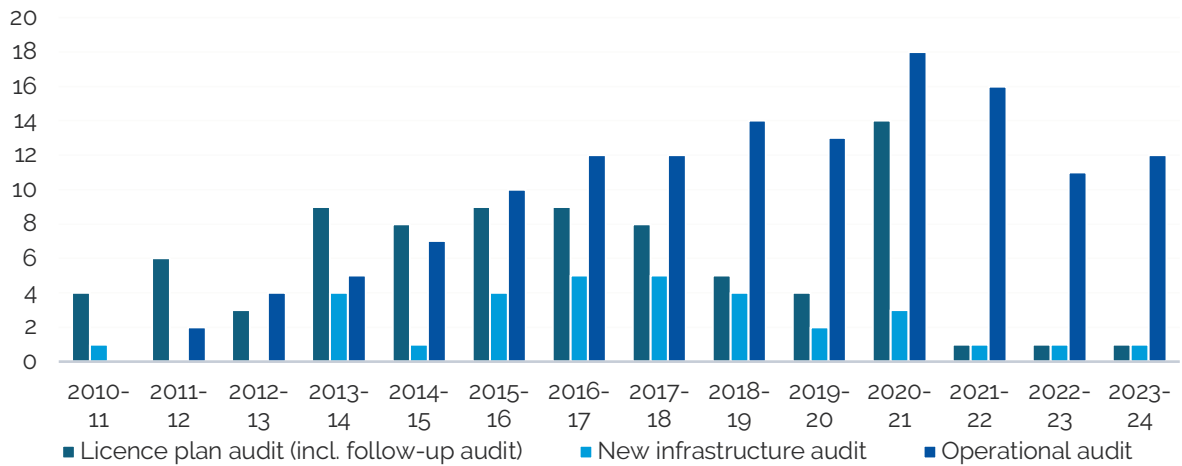


We recommenced face to face audit interviews and site visits for all schemes after taking a modified approach during the COVID pandemic.

There was one new infrastructure and one licence plan audit this year. These are generally required when new schemes are ready to commence commercial operations or when new infrastructure at existing schemes is ready to be commissioned. True Water’s new Ashbourne scheme was audited in April 2024 and was approved for commercial operational by the Tribunal in August 2024.

As we reported last year, we changed our audit framework in 2021-22 to better investigate and assess licensees’ implementation of water quality plans. Over the last 2 years we have seen a greater focus on licence plans during operational audits, and less need for specific licence plan audits. Over the last 4 years, there has been a general improvement in the quality of licence plans across the board. Figure 3.2 outlines the number of audits conducted each year.

Figure 3.2 Number of WIC Act audits per financial year



Source: IPART analysis

Appendices

A Audits undertaken in 2023-24

Table A.1 Operational audits for the 2023-24 reporting period

Licensee	Scheme	Audit period	Date final report received
Altogether Central Park Pty Ltd	Central Park	1 May 2023 – 31 January 2024	12 April 2024
Altogether Discovery Point Pty Ltd	Discovery Point	1 May 2023 – 31 January 2024	12 April 2024
Altogether Operations Pty Ltd	Shepherds Bay	1 May 2023 – 31 January 2024	12 April 2024
Altogether Huntlee Pty Ltd	Huntlee	1 May 2023 – 31 January 2024	12 April 2024
Altogether Cooranbong Pty Ltd	Cooranbong	1 May 2023 – 31 January 2024	12 April 2024
Altogether Pitt Town Pty Ltd	Pitt Town	1 May 2023 – 31 January 2024	12 April 2024
Altogether Operations Pty Ltd	Box Hill	1 May 2023 – 31 January 2024	12 April 2024
CPE Barangaroo Pty Ltd	Barangaroo	1 July 2021 – 31 January 2024	18 June 2024
Catherine Hill Bay Water Utility Pty Ltd	Catherine Hill Bay	1 November 2021 – 31 January 2024	26 April 2024
Aquacell Pty Ltd	1 Bligh St	1 April 2021 – 30 June 2023	9 October 2024
Aquacell Pty Ltd	Kurrajong	1 April 2022 – 31 May 2023	9 October 2024
Kyeema Water Pty Ltd	Gundaroo	1 October 2022 – 30 September 2023	19 January 2024

Source: IPART analysis

B Annual operating performance statistics – network operators

Table B.1 Operating statistics for WIC Act network operators in 2023-24

Licence number	Licensee	Scheme	A1	A2	A3	A4	A10	A11	A12
09_002	Rosehill Network Pty Ltd	Fairfield-Rosehill	0	0	0	0	0	0	0
09_003	Aquacell Pty Ltd	1 Bligh St	0	0	0	0	0	0	0
10_008	Veolia Water Solutions & Technologies Pty Ltd (Darling Walk)	Darling Quarter	0	0	0	0	0	0	0
10_010	Sydney Desalination Plant Pty Ltd	Sydney Desalination Plant	0	0	0	0	0	0	0
10_014	Altogether Pitt Town Pty Ltd	Pitt Town	0	0	0	0	0	1	0
12_016	Orica Australia Pty Ltd	Orica Groundwater scheme	3	3	0	0	0	0	0
12_022	Altogether Central Park Pty Ltd	Central Park	0	0	0	0	0	0	0
13_025	Altogether Discovery Point Pty Ltd	Discovery Point	0	0	0	0	0	0	0
15_029	Lend Lease Recycled water (Barangaroo South) Pty Ltd	Barangaroo	0	0	0	0	0	0	0
15_030	Altogether Huntlee Pty Ltd	Huntlee	0	0	0	0	0	1	0
15_032	Aquacell Pty Ltd	Kurrajong	0	0	0	0	0	0	0
15_033	Altogether Cooranbong Pty Ltd	Cooranbong	0	0	2	55	741	1	0
16_035	Catherine Hill Bay Water Utility Pty Ltd	Catherine Hill Bay	0	0	424 ^a	77	0	0	0
16_037	Altogether Operations Pty Ltd	Box Hill North	0	0	0	0	0	5	0
17_040	Narara Ecovillage Co-operative	Narara	0	0	0	0	0	0	0
17_042	Altogether Operations Pty Ltd	Shepherds Bay	0	0	0	0	0	0	0
19_043	Altogether Operations Pty Ltd	Glossodia	0	0	0	0	0	0	0
20_044	Kyeema Water Pty Ltd	Gundaroo	0	0	0	0	0	0	0
22_046	Kooragang Water Pty Ltd	Kooragang Industrial Water Scheme (KIWS)	0	0	0	0	0	0	0
Total			3	3	426	132	741	8	0

a. Solo Water reported 424 interruptions in its annual return. This reflects 1 interruption that lasted 77 minutes that affected 424 customers.

Source: IPART analysis

Legend: Performance indicators – definitions used in the table above

A1	Number of properties that experience an unplanned water interruption that lasts for more than five continuous hours in the financial year.
A2	Number of properties that experience three or more water interruptions that each lasts for more than one hour in the financial year.
A3	The total number of unplanned interruptions where customers are without potable water supply, during the reporting year (interruptions).
A4	The average duration for which a customer is without potable water, due to an unplanned supply interruption during the reporting year (minutes).
A10	Number of properties that experience a water pressure failure in the financial year.
A11	Number of properties (other than public properties) that experience an uncontrolled wastewater overflow in dry weather in the financial year.
A12	Number of properties (other than public properties) that experience three or more uncontrolled wastewater overflows in dry weather in the financial year.

C Annual operating performance statistics – retail suppliers

Table C.1 Operating statistics for WIC Act retail suppliers in 2023-24

Licence number	Licensee	Scheme	L1 (ML)	L2 (ML)	L3 (ML)	L4 '000	L5 '000	L6 '000	L7 '000	L8 '000	L9 '000
09_004R	Aquacell Pty Ltd	1 Bligh St and Kurrajong	10.30	5.5	13.5	0	0	0.052	0.001	0	0.001
10_01R	AquaNet Sydney Pty Ltd	Fairfield- Rosehill	1472	1472	0	0	0	0	0	0	0.011
10_009R	Veolia Water Solutions and Technologies Pty Ltd (Darling Walk)	Darling Quarter	33.33	23.05	61.46	0	0	0	0	0	0
10_011R	Sydney Desalination Plant Pty Ltd	Sydney Desalination Plant	35,216.46	0	0	0	0	0	0	0	0
12_017R	Orica Australia Pty Ltd	Orica groundwater scheme	537.68	537.68	0	0	0	0	0	0	0.005
13_001R	Altogether Group Pty Ltd	Pitt Town, Central Park, Discovery Point, Huntlee, Cooranbong, Box Hill North, Shepherds Bay	1714	924	1409	7.721	0.114	9.481	0.088	9.881	0.052
15_034R	CPE Barangaroo Pty Ltd	Barangaroo	106	106	302	0	0	0.55	0.019	0.474	0.018
15_036R	Solo Water Pty Ltd	Catherine Hill Bay	98.67	40.16	57.57	0.452	0	0.427	0	0.427	0
17_041R	Narara Ecovillage Co-operative Ltd	Narara	7.1	4.3	5.1	0.056	0.003	0.056	0.003	0.056	0.003
20_045R	Kyeema Water Pty Ltd	Gundaroo	0	0	0.864	0	0	0.023	0	0	0
22_047R	Kooragang Water Pty Ltd	KIWS	2501	2266	0.00	0	0.001	0	0	0	0.002
Total			41,696.5	5,378.7	1,849.5	8,229.0	118.0	10,589.0	111.0	10,838.0	92.0

a. Orica treats groundwater only and is not included in the operating statistics as treated groundwater does not meet the definition of recycled water in the WIC Act.

Source: IPART analysis

Legend: Licence data - definitions

L1	Total volume of water supplied (ML)	The total volume of drinking and non-potable water supplied, including for environmental flows and bulk water exports in the financial year.
L2	Total volume of non-potable water supplied (ML)	The total volume of non-potable water supplied by the utility during the reporting year, in megalitres (ML).
L3	Total volume of wastewater collected (ML)	The total volume of wastewater collected by the utility during the reporting year, in megalitres (ML).
L4	Connected residential properties – water supply (000s)	The number of connected residential properties receiving water supply services from the utility during the reporting year (properties 000s).
L5	Connected non-residential properties – water supply (000s)	The number of connected non-residential properties receiving water supply services from the utility during the reporting year (properties 000s).
L6	Connected residential properties – wastewater (000s)	The number of connected residential properties receiving wastewater services from the utility during the reporting year (properties 000s).
L7	Connected non-residential properties – wastewater (000s)	The number of connected non-residential properties receiving wastewater services from the utility during the reporting year (properties 000s).
L8	Connected residential properties – recycled water supply (000s)	The number of connected residential properties receiving recycled water services from the utility during the reporting year (properties 000s).
L9	Connected non-residential properties – recycled water supply (000s)	The number of connected non-residential properties receiving recycled water services from the utility during the reporting year (properties 000s).

Glossary

Altogether/Altogether Group	Altogether Group Pty Ltd
Amended WIC Act	<i>Water Industry Competition (Amendment) Act 2021</i>
Aquacell	Aquacell Pty Ltd
Barangaroo	Lend Lease Recycled Water (Barangaroo South) Pty Ltd
Box Hill	Box Hill scheme (licensed to Altogether Operations Pty Ltd)
Catherine Hill Bay/ CHBWU	Catherine Hill Bay Water Utilities Pty Ltd
Central Park	Altogether Central Park Pty Ltd
Cooranbong	Altogether Cooranbong Pty Ltd
Discovery Point	Altogether Discovery Point Pty Ltd
DPE	Department of Planning and Environment
Huntlee	Altogether Huntlee Pty Ltd
IPART	Independent Pricing and Regulatory Tribunal
Kooragang/KIWS	Kooragang Industrial Water Scheme
Kyeema	Kyeema Water Pty Ltd (formerly Kyeema Wastewater Pty Ltd)
Minister	Minister for Water
ML	Megalitres
Narara	Narara Ecovillage Co-operative Ltd
Panel	Technical Services and Water Licensing Audit Panel
Pitt Town	Altogether Pitt Town Pty Ltd
Rosehill Network	Rosehill Network Pty Ltd
Solo Water	Solo Water Pty Ltd
SDP	Sydney Desalination Plant Pty Ltd
Suez	Suez Water Pty Ltd
VWA	Veolia Water Australia Pty Ltd
VWST	Veolia Water Solutions and Technologies (Australia) Pty Ltd
WIC Act	<i>Water Industry Competition Act 2006 (NSW)</i>
WIC Amendment Bill	<i>Water Industry Competition Amendment Bill 2021 (NSW)</i>
WIC Amendment Regulation	<i>Water Industry Competition (General) Regulation 2022 (NSW)</i>
WIC Regulation	<i>Water Industry Competition (General) Regulation 2021 (NSW)</i>
WQP	Water Quality Plan
WUA	Water Utilities Australia Pty Ltd

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- ¹ As required under section 89(1) of the [WIC Act](#).
- ² Refer to Audit Grades in the [Audit Guideline, Water Industry Competition Act 2006, July 2020](#), pp. 10-11
- ³ NSW Department of Planning and Environment, [Greater Sydney Water Strategy](#), August 2022, p 7.
- ⁴ Sydney Water, [Desalination for Greater Sydney](#), p 2.
- ⁵ Refer to Audit Grades in the [Audit Guideline, Water Industry Competition Act 2006, July 2020](#), pp. 10-11
- ⁶ IPART [Audit Guidelines \(WICA\)](#) p 5.
- ⁷ [Water Industry Competition Act 2006](#) s 85A (1).
- ⁸ NSW Department of Planning and Environment, [Greater Sydney Water Strategy](#).
- ⁹ These included the network operator's licences of Simmonds & Bristow (09_005, cancelled on 3 July 2013), Osmoflo Water Supply Pty Ltd (11_018, cancelled on 17 December 2012), Mirvac Real Estate Pty Ltd (12_020, cancelled on 15 June 2016), Aquacell Pty Ltd (13_023 cancelled on 15 December 2017); Veolia Water Australia Pty Ltd (09_001 cancelled on 20 September 2021), Wye Water Pty Ltd (14_026 cancelled on 18 October 2021), and Veolia Water Solutions and Technologies Pty Ltd (10_012 cancelled on 28 June 2022), and Suez Water Pty Ltd (16_038 cancelled on 4 November 2022); and the retail supplier licences of Simmonds & Bristow (09_006R, cancelled on 3 July 2013), Pitt Town Water Factory Pty Ltd (10_015R, cancelled on 15 December 2014), Osmoflo Water Supply Pty Ltd (11_019R, cancelled on 17 December 2012), Mirvac Real Estate Pty Ltd (12_021R, cancelled on 15 June 2016), Veolia Water Solutions and Technologies Pty Ltd (10_013R cancelled on 28 June 2022), and Suez Water Pty Ltd (16_039R cancelled on 4 November 2022)
- ¹⁰ Sydney Water, [Annual Report 2021-2022](#), p 17.
- ¹¹ [Water Industry Competition Act 2006](#) s 8 and 8A.
- ¹² [Water Industry Competition Act 2006](#) s 8E.
- ¹³ [Water Industry Competition Act 2006](#) s 8F.
- ¹⁴ [Water Industry Competition Act 2006](#) s 7C.
- ¹⁵ [Water Industry Competition Act 2006](#) s 7K and 8M.
- ¹⁶ [Water Industry Competition Act 2006](#) pt 5A.
- ¹⁷ [Water Industry Competition Act 2006](#) s 55A.
- ¹⁸ [Water Industry Competition Act 2006](#) s 46AB.
- ¹⁹ [Water Industry Competition Act 2006](#) pt 7A.
- ²⁰ WIC Act, Long Title
- ²¹ Under section 16 of the version of the WIC Act that was in force immediately before 1 March 2024, which applied to compliance activity in FY23/24.
- ²² [Amended WIC Act, Division 6](#).
- ²³ WIC Act, long title.
- ²⁴ The long title of the WIC Act is *An Act to encourage competition in relation to the supply of water and the provision of sewerage services and to facilitate the development of infrastructure for the production and reticulation of recycled water, and for other purposes*.
- ²⁵ [WIC Regulation](#), Schedule 1, clause 2(2).
- ²⁶ [WIC Regulation](#), Schedule 1, clauses 6, 7, 13 and 14 and Schedule 2, clause 7A.