

# Inspection guidance – water carters

This factsheet has been developed by the Department for Health & Ageing (DHA) to provide assistance to approved Level 2 auditors and Level 3 inspectors when inspecting water carters under The *Safe Drinking Water Act 2011* (the Act) and *Safe Drinking Water Regulations 2012* (the Regulations). This fact sheet should be referred to when completing the “Safe Drinking Water Act 2011 Audit / Inspection Report”.

## Introduction

Audits / inspections are to be performed by persons approved under Section 15 of the Act as Level 2 auditors or Level 3 inspectors. Under section 20 (1) of the Act drinking water providers are subject to audit or inspection every 1 to 2 years depending on the size and complexity of the scheme and the vulnerability of the population supplied. Water carters are subject to inspection once every two years. The scheme for audits and inspections was published in the Government Gazette and is also available on the Safe Drinking Water Act website.

*Please note that under the Act the process for audit and inspection is the same. Review of the risk management plan and related procedures and records must be undertaken as required by the Act. Inspections are expected to be less comprehensive than audits.*

## Duties of an Auditor / Inspector

Under section 21 of the Act and Section 10 of the Regulations an auditor or inspector has the following duties:

- To determine whether the drinking water provider has complied with the requirements of part 3 of the Act relating to risk management plans
- To carry out follow up audits / inspections if necessary
- To report on the outcome of the audit / inspection
- To make recommendations as to changes to any component of the RMP and the reasons for such recommendations
- To make recommendations as to any other matters that require improvement or remedial action or are otherwise of concern to the auditor or inspector
- To determine whether any remedial action has been taken by the drinking water provider in relation to circumstances of non-compliance



## The Inspection

The following section provides explanatory notes for each question within the Safe Drinking Water Act 2011 Audit / Inspection Report

### Implementation and Review of Risk Management Plans (RMPs)

#### 1. Is there evidence that a drinking water RMP has been implemented?

Under Section 12 of the Act, a drinking water provider must prepare and implement a risk management plan. In most cases this requirement can be met by adopting a standard RMP (see below).

#### 2. Has a standard RMP been adopted?

Standard risk management plans have been developed by DHA for water carters carting bore water, rainwater and / or mains water and water carters carting mains water only. These can be accessed from [www.sahealth.sa.gov.au/safedrinkingwateract](http://www.sahealth.sa.gov.au/safedrinkingwateract).

#### 3. Has the RMP been revised where revision was found to be required as a result of internal review or the previous audit / inspection?

Under section 21 of the Act, auditors and inspectors are required to identify any deficiencies in the RMP. Under section 12 (1) of the Act the drinking water provider must revise any aspect of the RMP that requires revision.

### RMP Content

#### 4. Are all sections of the RMP complete?

Under section 13 (1) of the Act a risk management plan should include:

- a detailed description of the system of supply
- Identified risks that have the potential to impact on the quality of water provided
- An assessment of the identified risks
- Preventative measures adopted to manage the risks
- A monitoring program outlining testing and monitoring requirements to maintain and verify a safe drinking water supply
  - In the standard RMP this is split into 2 sections- operational monitoring and verification monitoring
- Incident identification, notification and response procedures
- Maintenance schedules for the drinking water supply

If a standard RMP has been adopted all sections of the standard RMP template should be filled in. Custom RMPs must contain each of the above sections.



## 5. Is the level of detail adequate for the size and complexity of the supply?

This guidance document relates to the inspection of water carters. For more complex systems that include multiple source waters or extensive treatment, this inspection fact sheet is not appropriate.

Questions to consider include:

- Is the description of the system of supply complete and accurate?
- Have all hazards and risks that have the potential to impact on drinking water quality been identified?
  - For rainwater and bore water specific risks see the relevant guidance documents (small bore water or small rainwater supplies).
  - Refer to the standard RMP for water carting or water carting (mains water) for additional potential hazards
- Is the monitoring and testing plan adequate?
  - Operational monitoring i.e. inspection and maintenance of the water cart should be undertaken at least every 3 months
  - All water supplies should be chlorinated prior to the point of supply and the chlorine residual recorded

## 6. Is there evidence that a hazard identification and risk assessment process has been carried out?

General hazards have been identified in the standard RMPs. In some instances, additional, supply specific hazards may be present that require identifying and managing.

## 7. Is there evidence that preventative measures have been established and are in operation to manage all risks?

Preventative measures are established and undertaken to manage risks. Refer to the RMP to ensure preventative measures have been identified. Copies of monitoring records should be sighted to ensure preventative measures are operating.

### Records Management

## 8. Is there evidence all operational monitoring has been performed?

Evidence of operational monitoring of the water cart should be in the form of records and results of monitoring. This should be undertaken every 3 months. Records should be kept for 5 years. For water carters carting rainwater or bore water see relevant guidance documents.

## 9. Is there evidence all verification monitoring has been performed?

For water carters, verification monitoring consists of testing that a chlorine residual is present prior to the point of supply to the customer. Water carters must maintain a log book with delivery details and the measured chlorine residual.

If water is carted from a bore water source, verification monitoring should also include routine monitoring for *E. coli* and health related chemicals as outlined in the RMP and DHA approval letter. Carted rainwater sources do not require *E. coli* monitoring unlike uncartered rainwater supplies. Under Section 9 (5) of the Regulations, *E. coli* monitoring results for bore water sources must be kept for 5 years.

Under section 25 of the Act and Section 13 of the Regulations testing must have been undertaken by a NATA accredited laboratory.



**10. Are records maintained for corrective actions taken where preventative measures have failed?**

Corrective actions must be outlined for failures in preventative measures. For example if during routine monitoring a hole was found in the tank, the corrective action should be to fix the hole to ensure the tank is fully sealed. All records of where corrective actions have been implemented for failures in preventative measures that are “non-incidents” should be available to view.

**11. Have any incidents or *E. coli* exceedances occurred within the inspection period and were they reported to DHA?**

Under section 13 of the Act all RMPs must include an incident identification and notification protocol. The incident identification and notification protocol outlines events that if occur would constitute a potential risk to health and require remedial action and notification of the DHA. Refer to the incident identification and notification protocol for supply specific incident notification requirements.

Failure to detect a chlorine residual is not an incident as this water **must not** be delivered. Instead, chlorine should be dosed into the cart and the residual retested and confirmed prior to delivery.

**12. Is there evidence that remedial action was taken?**

Are records available outlining the remedial action taken? Did follow up sampling indicate the risk was managed? For a microbiological incident (*E. coli* detection in bore water) remedial action would include identifying and correcting the reason for the exceedance (i.e. remove livestock grazing in bore protection zone).

**13. If applicable, has the RMP been updated to prevent future incidents?**

Under section 12 of the Act the drinking water provider must revise any aspect of the RMP that requires revision. If on review, the RMP requires updating in order to manage newly identified risks and prevent future exceedances, this should be undertaken.

### Visual Inspection

**14. Perform an inspection of the drinking water system from catchment to tap. Is the system operating in accordance with the RMP?**

Under section 21 of the Act the auditor / inspector must determine whether the drinking water provider has complied with the RMP. This includes ensuring that the drinking water system is being maintained and that identified risks have been managed in accordance with the RMP. During the inspection you should visually confirm this. For water carts, a visual inspection includes inspecting the truck, hoses and associated fittings and checking they are stored correctly, clean and in good working order. Additional inspection is to be performed for carted rainwater and bore water as per the rainwater and bore water supply audit/inspection guidance documents.

If visual inspection identifies any deficiencies in compliance with the RMP, the drinking water provider must take action to remedy this. The inspector must then, under section 21 of the Act, carry out a follow up audit or inspection to confirm that action has been taken.

**Under no circumstances should you put yourself under any danger during the visual inspection. The visual inspection must be conducted from the ground.**



## Recommendations

Using the information and answers to the checklist questions have any non-compliances in the RMP been identified? These should be listed and described in the recommendations table on page 4 of the audit / inspection report. Non-compliances must be followed up by a date made in consultation with the drinking water provider and the DHA Water Quality Unit.

## Reporting requirements

Section 10 of the Regulations requires this report to be provided to DHA within 21 days after the completion of the inspection. Additional information may be requested by DHA as required. The inspection form can be mailed via the address below or emailed to [waterquality@health.sa.gov.au](mailto:waterquality@health.sa.gov.au). A copy of the inspection report as provided to DHA must also be provided to the drinking water provider under section 22 (6) of the Act.

Water Quality Unit  
Department for Health and Ageing  
PO Box 6, Rundle Mall  
ADELAIDE SA 5000

**If as a result of this inspection, you are concerned that the drinking water may be unsafe, you must report your concerns immediately to DHA on 8226 7100 during business hours or 1300 558 657 outside of business hours. This is a requirement under section 22 (4) of the Act.**

