

All communications are
to be addressed to the
Chief Executive Officer



When telephoning or calling
please ask for:

MR MICHAEL SHELLSHEAR
Our Ref: MS:TK (D12/9511)

8th November 2012

Mr Michael Crandon
The Chairman
Finance and Administration Committee
Parliament House
Alice and George Streets
BRISBANE QLD 4000



Email Sent: fac@parliament.qld.gov.au

Dear Mr Crandon,

INQUIRY INTO SOUTH EAST QUEENSLAND WATER (RESTRUCTURING) AND OTHER LEGISLATION AMENDMENT BILL 2012

The Balonne Shire Council is in favour of the proposed amendments to *Water Fluoridation Act 2008* which extend the criteria under which an exemption may be sought from the requirement to fluoridate the St George potable water supply. It is the intention of the Balonne Shire Council to make an application for exemption from the Queensland Regional Fluoridation Program.

The Balonne Shire Council is in receipt of correspondence from Dr Greg Jackson, Director – Water Quality Unit of Queensland Health which states that the Health Minister has granted approval for the removal of the current timeframes by which fluoridation must be implemented. The letter cites that the St George potable water supply is considered to be part of a small minority of potable water schemes that may face significant public health and/or infrastructure issues which may hamper the implementation of fluoridation. Further correspondence received from Queensland Health regarding the proposed amendments to the *Water Fluoridation Act 2008* shows the timeline to fluoridate has not been removed, but extended to 31st December 2013 for the Balonne Shire Council. Under these amendments it is understood that the Balonne Shire Council would still need to lodge an exemption application.

Potable water in St George is sourced entirely from a single free flowing Great Artesian Basin bore. The water quality consistently meets the Australian Drinking Water Guidelines health limits; however exceeds the aesthetic limit for pH, total dissolved solids and sodium. Whilst the water is safe for human consumption, the levels of pH, total dissolved solids and sodium can create an unpleasant taste. It is widely understood that the majority of St George residents do not consume the potable supply for drinking and utilise collected rain water as a primary source of drinking water. A recent survey sent to all residents connected to the St George potable water supply showed that approximately 20% or 554 persons out of an

estimated 2800 residents consume the potable water supply for drinking.

By satisfying any of the criteria listed under Section 8 of the *Water Fluoridation Act 2008*, a public potable water supplier may apply for an exemption from the requirement to add fluoride. Listed below is a response to each of the existing and proposed exemption criteria that the Balonne Shire Council will be utilising as part of an exemption application.

S8 (1) (a) the water supply contains naturally occurring fluoride at an average concentration that is within the minimum and maximum concentrations prescribed under a regulation or above that maximum concentration;

The St George potable water supply currently contains an average fluoride concentration of 0.36 mg/L. Whilst this concentration does not meet the mandated level of 0.8mg/L under the *Water Fluoridation Act 2008*, it could be argued that the small number of St George residents that consume bore water are already receiving and will continue to receive some dental health benefits from the naturally occurring fluoride.

S8(1) (c) both of the following apply—

(i) the addition of fluoride to the water supply is unlikely to result in a substantial ongoing oral health benefit to the community, or part of the community, of the area serviced by the water supply;

(ii) the number of members of the public who consume water from the water supply is less than 1000.

Clause (i) is considered to be a very subjective condition. A benefit or there lack of can be demonstrated quantitatively. By implementing fluoride under the Queensland Regional Fluoridation Program, an increase above the existing fluoride concentration of 0.44mg/L will be achieved for only 554 persons. The Balonne Shire Council does not consider this will result in a "substantial" ongoing oral health benefit to the community. Clause (ii) above is clearly satisfied as the 554 persons consuming water from the supply is well below the legislated threshold of 1000. The proposed amendments to S8 (1) (c) does clarify this criteria.

It is considered that the Balonne Shire Council also meets two of the proposed additional criteria in the amendments of Section 8 of the *Water Fluoridation Act 2008* including:

S8 (1) (d) the unreasonable cost, of implementing or maintaining the addition of fluoride to the water supply supplying water to an urban centre of less than 10,000 members of the public, to members of the public or the water supplier;

The capital cost of the project has been estimated at \$465,371.00 excluding GST. This cost would be fully funded by the Department Employment, Economic Development and Innovation (DEEDI) under the QFCAP arrangement. The estimated annual operating cost of the fluoride dosing facility is \$24,564.00 excluding GST. All operating costs would be met by Council. The Balonne Shire Council considers that the proposed expenditure on fluoridation at St George would be a misguided use of both State and Local Government funds. Under the existing legislation there were no grounds to apply for an exemption based

on the unreasonable cost of implementing fluoride. The Balonne Shire Council is strongly in favour of the proposed addition of section S8 (1) (d) to the *Water Fluoridation Act 2008*.

S8 (1) (e) the water supplier cannot ensure the effective and safe addition of fluoride to the water supply;

The St George potable water supply does not currently undergo any form of treatment or disinfection. As such the Balonne Shire Council does not have the need to employ any trained water treatment plant operators. Like many small Councils in western Queensland, the Balonne Shire Council faces challenges recruiting and retaining skilled employees. It is envisaged that a minimum of two (possibly three) operators would be required to operate the plant. If a fluoride dosing plant was to be installed in St George, there is no guarantee that Council would be able to recruit or train suitably qualified operators for a fluoride dosing facility.

As stated above, the Balonne Shire Council supports the proposed changes to the *Water Fluoridation Act 2008*. The Balonne Shire Council considers that there are reasonable grounds for an exemption application based on the existing legislation. Notwithstanding, the proposed amendments would further strengthen the Balonne Shire Council application for an exemption from fluoridation.

If you have any queries regarding the content of this submission, please do not hesitate to contact Council's Project Engineer, Mr Michael Shellshear on telephone (07) 4620 8814.

Yours faithfully



Scott Norman
CHIEF EXECUTIVE OFFICER