



Western Corridor  
Recycled Water  
Scheme

Recycled Water  
Management Plan  
Annual Report  
2024-2025

Scheme Reference Number SRN013

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# 1. Executive Summary

The Queensland Bulk Water Supply Authority trading as Seqwater (Seqwater) (SPID SRN013), is the Scheme Manager of the multiple-entity Western Corridor Recycled Water Scheme (WCRWS or the Scheme). On 13 December 2023, Water Supply Regulation (Regulator) issued an Information Notice for the Decision (current Information Notice for the Decision) approving Seqwater's amended WCRWS Recycled Water Management Plan (RWMP) for the continued supply of purified recycled water (recycled water or PRW) for electricity generation and industrial uses. The current Information Notice for the Decision does not include approval for augmentation of a supply of drinking with recycled water.

The purpose of this annual report is to provide the Regulator with information on the overall performance of the Scheme for the reporting period (1 July 2024 to 30 June 2025 - reporting period). This annual report was produced in accordance with section 273 of the *Water Supply (Safety & Reliability) Act 2008* (the Act) and the Department of Local Government, Water and Volunteers (DLGWV) *Annual Reporting Guidelines for Recycled Water Schemes (2010)* (Guidelines). This report also provides an accountability mechanism to PRW customers and the community.

The WCRWS has a design capacity of 230 ML/d and a full operational capacity of 180 ML/d. Luggage Point Advanced Water Treatment Plant (AWTP) remains the only current operable plant in the Scheme, having a design capacity of 70 megalitres per day (ML/d) and a current reduced capacity of 46 ML/d. During the reporting period, the Luggage Point AWTP supplied 2,442 ML of PRW to CleanCo's Swanbank Power Station and Stanwell Corporation's Tarong Power Station. Supply of PRW to Urban Utilities, for the purpose of on-supply for industrial use, did not occur in the reporting period.

A total of 47,891 external laboratory tests were performed on PRW in the reporting period at the Luggage Point AWTP and Lake Wivenhoe Points of Supply (PoS). Three tests returned results for which the concentration of a parameter was more than the value stated in Section 53 of *Public Health Regulation 2018* (Qld) (PHR), and details of each were given to the Regulator under section 270 of the Act. Two of these tests were for dichloromethane (methylene chloride) for the Lake Wivenhoe PoS which were due to contamination from storage 'eskies' supplied by the external laboratory. Test results were subsequently retracted by the external laboratory and additional controls are now in place. One test result for *Clostridium perfringens* for the Luggage Point AWTP PoS returned a result for which the concentration was more than the value stated in the PHR. Considering factors investigated, and the AWTP treatment processes capability and performance, it is considered to be sample or analytical error and investigation is ongoing in this area.

There were 26 tests which returned results greater than an Interim Water Quality Value (IWQV) for the reporting period. The parameters were bromochloroacetic acid, dibromoacetic acid and n-Nitrosodibutylamine (NDBA). There were no tests missed in the reporting period for the Luggage Point AWTP or Lake Wivenhoe PoS. Missed tests to a PoS for energy generation are noted in this report and replacement samples were collected.

A regular review of the RWMP was performed in the reporting period and an application for amendment submitted to the Regulator.. The amendment incorporated updates to the Risk Assessment, Monitoring Program, process for deriving and applying IWQVs, derivation of additional IWQVs, Improvement Plan and various other updates to ensure currency of documentation relevant to Seqwater and Urban Utilities operations of the WCRWS.

An internal audit of the RWMP to assess compliance with the RWMP and its conditions was completed in the reporting period. There were no non-conformances, however, 12 opportunities for improvement (OFIs) were identified to strengthen treatment operations and management of PRW quality. No regular (external) audits of the RWMP were required to be conducted during the reporting period.

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## 2. Introduction

The 2024-2025 annual report for the WCRWS outlines the operation of the Scheme under the approved RWMP to supply purified recycled water for energy generation and industrial supply. The report includes:

- The outcome of any review or amendments of the RWMP and how matters raised in the review have been addressed;
- Details of findings of, and any recommendations stated in, an internal or regular (external) audit given to the Regulator in the financial year; and
- Summary of the quality of purified recycled water and details of any notifications to the Regulator under section 270 or 271 of the Act.

This report is submitted to the Regulator to fulfil the legislative requirements of the Act and is made available to the public through the Seqwater website or for inspection upon request at Seqwater’s Head Office during office hours on business days.

### 2.1. Purpose

This annual report has been prepared in accordance with section 273 of the Act and the Regulator’s Guidelines (Table 1). The purpose of this annual report is to provide the Regulator with information on the overall performance of the Scheme for the period 1 July 2024 to 30 June 2025 and provide an accountability mechanism to purified recycled water customers and the South East Queensland community.

**Table 1 Annual Report Requirements**

Annual report requirements	Act section	Annual Reporting Guideline	Seqwater compliance
The relevant entity for a recycled water scheme must prepare an annual report for each financial year after a recycled water management plan for the Scheme has been approved.	s273(1) of the Act	Section 2.3	This report is for the 2024-2025 financial year.
The annual report must– a. be prepared in accordance with the guidelines, if any, made by the Regulator about the preparation of annual reports.	s273(2)(a) of the Act	Section 1 to section 2.12 (inclusive)	This report is aligned with the Guidelines.
b. state the outcome of any review of the recycled water management plan in the financial year to which the annual report relates, and how the matters raised in the review have been addressed.	s273(2)(b) of the Act	Section 2.4	Section 6 of this report – a review of the RWMP was completed in the reporting period, the outcome and how the matters raised in the review have been addressed are in section 6.

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Annual report requirements	Act section	Annual Reporting Guideline	Seqwater compliance
c. contain details of the findings of, and any recommendations stated in, an internal audit report under section 260 or a regular audit report under section 261 given to the Regulator in the financial year.	s273(2)(c) of the Act	Section 2.4	Section 7 of this report – an internal audit under section 260 of the Act was completed in the reporting period. No regular (external) audits of the RWMP were required to be conducted during the reporting period however details of one Opportunity for Improvement (OFI) that is progressing but remains yet to be closed from the regular audit report given to the Regulator on 11 December 2022 is noted in Section 7 of this report.
d. contain details of the information given to the Regulator under section 270 or 271 in the financial year.	s273(2)(d) of the Act	Section 2.4	Section 3 of this report – Three tests returned a result for which the concentration of a parameter was more than the value stated in in Section 53 of the PHR and details were given to the Regulator under s 270 of the Act. Two of these results were retracted by the independent external laboratory. Section 4 of this report – There were no reportable instances in which a ‘no result’ or ‘laboratory error’ were given to the Regulator under s 270 of the Act for Luggage Point AWTP or Lake Wivenhoe PoS as per the current Information Notice. Section 4.3 of this report – There were no prescribed incidents under s 271 of the Act.

## 2.2. Plan overview

The Scheme’s RWMP was developed under the Act and consists of a Scheme Manager Plan (SMP), Seqwater Scheme Provider Plan and Urban Utilities Scheme Provider Plan (together, the SPPs). Seqwater and Urban Utilities must comply with the Scheme’s RWMP approved by the Regulator. The RWMP has been developed to be consistent with DLGWV’s *Recycled Water Management Plan and Validation Guidelines (2008)*.

A Critical Scheme Declaration was issued on 2 July 2021 by the Regulator following restart of a single process train during 2018, following a period in ‘care and maintenance’ mode that began in 2013. The current Information Notice for the Decision for the reporting period, dated 13 December 2023 as amended 22 January 2024, approves the RWMP incorporating the SMP and the SPPs for supply of PRW for electricity generation and industrial uses.

## 2.3. Scheme overview and status

The Scheme is one of the largest water recycling schemes in Australia, increasing and diversifying South East Queensland’s water sources. At full operational capacity, the WCRWS can deliver up to 180 ML of purified recycled water a day. The Scheme has three AWTPs, owned by Seqwater and operated under contract by Veolia, located at

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Bundamba, Gibson Island and Luggage Point. To produce PRW, these plants combined treat water supplied from six of Urban Utilities' Sewage Treatment Plants (STP) located at Bundamba, Gibson Island, Goodna, Luggage Point, Oxley Creek and Wacol. More than 200 kilometres of large diameter pipelines connect the STPs, AWTPs, Lake Wivenhoe, power stations and Urban Utilities' infrastructure (for on-supply for industrial use).

Seqwater's Water Security Program 2023 sets out the plan to ensure South East Queensland communities have access to a safe, secure and valued water supply now, and for future generations. The WCRWS is an important drought supply asset, which can be considered to augment a drinking water supply during a severe drought when the combined level of Seqwater's Water Grid storages reach 40%. Purified recycled water continues to be provided to power stations for energy generation. Seqwater's Water Security Program 2023 also includes the strategy for Seqwater to continue to explore further opportunities to utilise the Scheme to supply to industry and agricultural customers to offset some potable demand.

### 2.3.1. Bundamba AWTP Point of Supply

The Bundamba AWTP was non-operational and did not produce or supply purified recycled water at any time during the reporting period. As such, no monitoring from the Bundamba AWTP Point of Supply was required.

### 2.3.2. Gibson Island AWTP Point of Supply

The Gibson Island AWTP was non-operational and did not produce or supply purified recycled water at any time during the reporting period. As such, no monitoring from the Gibson Island AWTP Point of Supply was required.

### 2.3.3. Luggage Point AWTP Point of Supply

The Luggage Point AWTP was the only operable plant in the Scheme and produced a cumulative volume of 2,442 ML of purified recycled water for the reporting period. The Luggage Point AWTP was available to supply purified recycled water to power stations and Urban Utilities during the reporting period. However, no supply to Urban Utilities occurred during the reporting period as there was no demand.

The Scheme is currently not approved to supply purified recycled water to augment a supply of drinking water. However, under the current Information Notice for the Decision, the quality standard for recycled water intended to augment a supply of drinking water as per Section 53 of the PHR applies at this Point of Supply. This assessment is provided below in Section 3.

The Luggage Point AWTP has an installed capacity of 70 ML/day however the plant was operated at a reduced capacity of 46 ML/day through the reporting period due to decreased demand.

During the reporting period, the following volumes of purified recycled water were supplied<sup>1</sup> to:

- CleanCo's Swanbank Power Station: 776 ML
- Stanwell Corporation's Tarong Power Station: 1,666 ML
- Urban Utilities (for on-supply to Incitec Pivot): 0 ML.

### 2.3.4. Lake Wivenhoe Point of Supply (augmentation of drinking water supply)

Purified recycled water was not supplied to Lake Wivenhoe during the reporting period, however, Seqwater undertakes sampling from the Lake Wivenhoe Point of Supply when PRW is being supplied to Stanwell

<sup>1</sup> Volumes produced and supplied are based on Seqwater Operations billing data.

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Corporation's Tarong Power Station. The Scheme is currently not approved to supply purified recycled water to augment a supply of drinking water via the Lake Wivenhoe Point of Supply. However, under the current Information Notice for the Decision, the quality standard for purified recycled water at this Point of Supply is the standard for recycled water intended to augment a supply of drinking water described in Section 53 of the PHR. This assessment is provided below in Section 3.

### 2.3.5. Points of Supply for energy generation and industrial uses

The RWMP encompasses water supplied by the Scheme for energy generation and industrial uses. The quality standard for purified recycled water supplied for energy generation and industrial use are set out in individual Bulk Water Supply Agreements with customers. An assessment of purified recycled water quality to these customers is provided in accordance with these Bulk Water Supply Agreements, and therefore not detailed in this report.

Stanwell Corporation's Tarong Power Station is located at the end of the purified recycled water pipeline supply system. Water quality in the pipeline must be maintained to meet water quality requirements under the Bulk Water Supply Agreement with Stanwell Corporation. To mitigate any decline in water quality due to water age in the pipeline during times of low demand from Stanwell Corporation, purified recycled water supply is maintained at a minimum flow rate (referred to as flushing water).

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### 3. Quality standard for recycled water intended to augment a supply of drinking water

Seqwater’s WCRWS Monitoring Program (Monitoring Program) details the Verification Monitoring component of the Scheme Monitoring Program. It represents a final assessment of the performance of the WCRWS, verifying purified recycled water meets the quality criteria; and monitors any long-term trends or changes in quality of purified recycled water. Verification Monitoring is separate to Operational Monitoring and is undertaken by independent laboratories that are National Association of Testing Authorities (NATA) accredited for most of the analyses. Analysis that is not NATA-accredited, where specialised analysis is required, is undertaken typically at research laboratories, under a robust quality system.

Under the Monitoring Program, a total of 25,622 tests were performed on samples from the Luggage Point AWTP Point of Supply and a total of 22,269 tests were performed on samples from the Lake Wivenhoe Point of Supply. The summary statistics from the Monitoring Program for all parameters for source water to the AWTP (treated wastewater) and purified recycled water at the Luggage Point AWTP Point of Supply and the Lake Wivenhoe Point of Supply is provided within Enclosure 1 and Enclosures 2a and 2b.

Under the current Information Notice for the Decision, the quality of the purified recycled water produced or supplied by the WCRWS must be tested for the presence of each required parameter at the frequency specified in the Monitoring Program at the Lake Wivenhoe Point of Supply and at the AWTP Points of Supply. Each sample of the water taken at the Point of Supply and tested for a parameter must comply with the quality standard for purified recycled water intended to augment a supply of drinking water prescribed in Section 53 of the PHR. Details of notifications to the Regulator under section 270 of the Act where the quality of purified recycled water produced or supplied under the Scheme did not comply with the water quality criteria for the purified recycled water relevant to the Scheme for the reporting period are provided in Section 3.1 below.

The current Information Notice for the Decision also requires where a parameter is detected that does not have a quality standard prescribed in Section 53 of the PHR, Seqwater must undertake a risk assessment for the parameter which includes obtaining or deriving an interim water quality value (IWQV). Several IWQVs have been obtained or derived and incorporated into the Monitoring Program. Details of tests for which the quality of purified recycled water produced or supplied returned a result above an IWQV are provided in Section 3.2 below.

#### 3.1. Non-compliance with water quality criteria

Three samples returned results for which the concentration of a parameter was more than the value stated in Section 53 of the PHR. Two of these samples were for dichloromethane (methylene chloride) for the Lake Wivenhoe Point of Supply and one sample was for *Clostridium perfringens* for the Luggage Point AWTP Point of Supply. Table 2 summarises the details of the non-compliances given to the Regulator.

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**Table 2 Non-compliance with water quality criteria: regulated standard for purified recycled water intended to augment a supply of drinking water**

Incident Number and date(s) reported	Parameter	Regulated Standard	Type of sample and frequency required	Actual value(s) and date(s) sample(s) collected	Point(s) of Supply	Circumstances, corrective actions and preventative measures
RWI-SRN013-24-11015  Initially reported 11 June 2024 (previous reporting period)	Dichloromethane (methylene chloride)	0.004 mg/L	Not required but tested as part of suite of other tests required under the WCRWS Monitoring Program	0.010 mg/L for sample collected 28 November 2024  0.015 mg/L for sample collected 3 December 2024	Lake Wivenhoe Point of Supply <sup>1</sup>	<p>The Australian Drinking Water Guidelines 2011 (ADWG) describes dichloromethane (methylene chloride) as being a widely used organic solvent which readily volatilises into air and degrades in the atmosphere. In the previous reporting period, it was reported that the cause for the presence of dichloromethane (methylene chloride) was not identified.</p> <p>Investigation has since found dichloromethane (methylene chloride) is a de-nesting agent for polyurethane foam 'esky' insulation. Sample bottles are stored in these 'eskies' for more than two weeks before being used to take source water and PRW samples. The bottles comprise of a permeable septum bottle cap. The presence of dichloromethane (methylene chloride) in the 'esky' insulation, the sample bottle storage time and sample cap type, resulted in contamination of the sample bottles and subsequent exceedances.</p> <p>The independent external laboratory now sources eskies that are confirmed by the supplier and re-confirmed by the external laboratory through verification testing (representative of storage practices) to be free from contaminants.</p> <p>The external laboratory retracted results where a detection of dichloromethane (methylene chloride) was measured and was linked to the investigation.<sup>2</sup></p>
RWI-SRN013-25-11779  24 January 2025	<i>Clostridium perfringens</i>	<1 spores /100mL	Grab sample Weekly	2 spores /100mL  21 January 2025	Luggage Point AWTP Point of Supply	<p>No corresponding AWTP treatment process issues, points of ingress or contamination relevant to this PoS have been attributed to being the cause for the presence of <i>Clostridium perfringens</i> in the sample.</p> <p>It is considered to be sample or analytical error and investigation is ongoing in this area.</p> <p>The treatment process continues to be operated within limits and assets continue to be inspected and maintained to prevent ingress and external contamination.</p>

<sup>1</sup>Purified recycled water was not supplied to Lake Wivenhoe, however, Seqwater undertakes sampling from the Lake Wivenhoe Point of Supply when PRW is being supplied to Stanwell Corporation's Tarong Power Station.

<sup>2</sup>Note this does not represent a missed test for the WCRWS Monitoring Program as dichloromethane (methylene chloride) is not required in the Monitoring Program.

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### 3.1.1. Public health risk assessment

In accordance with the WCRWS Recycled Water Management Plan (RWMP), an assessment of the risk to public health from PRW is required if in any sample of PRW (excluding points of supply to energy generation), the concentration of a parameter is more than the value stated in the standard. The Scheme Manager's component of the health risk assessment involves assessment of the likely concentration and volume of PRW supplied as well as the fate of the parameter within Lake Wivenhoe.

Two public health risk assessments were provided to the regulator in the reporting period for dichloromethane (methylene chloride) on 2 October 2024 and for *Clostridium perfringens* on 16 May 2025.

The Wivenhoe Dam Wall Offtake is representative of source water to the Wivenhoe Water Treatment Plant (currently offline) and a conservative assessment of source water to the Lowood and Mount Crosby Water Treatment Plants. For the Lowood and Mount Crosby Water Treatment Plants, this does not factor in any further inputs (dilution) or fate along the Mid-Brisbane River.

#### Dichloromethane (methylene chloride)

The fate of the parameter within Lake Wivenhoe is a function of dilution and fugacity (removal) processes within the lake. Where a parameter has at least eight quantified concentrations, the Probability Distribution Function and Fate tool (PDFF tool) can be used to provide a quantitative probability of exceedance of the standard of a parameter from PRW at the Lake Wivenhoe Dam Wall Offtake. However, in the case of dichloromethane (methylene chloride) there was, at the time of submitting the Public Health Risk Assessment to the Regulator, only a single sample with a quantified concentration, this significantly increases the uncertainty of the PDFF to the extent that it is unable to provide a quantitative probability of exceedance value (Leusch, 2012). Instead, the maximum quantified result is assessed by applying the fugacity model developed by Hawker *et al.* (2011) and the predicted % PRW (dilution) at the Dam Wall from Yu *et al.* (2021) hydrodynamic model, which are 99.77% and up to 1.4% respectively.

In this instance, after applying these predicted fate and dilution processes in Lake Wivenhoe for dichloromethane (methylene chloride) the probability of exceeding the PHR standard at the dam wall is considered Low.

#### *Clostridium perfringens*

Research undertaken for the Scheme including the project *Purified Recycled Water and Lake Wivenhoe modelling of pathogen fate and transport (2021)* includes *Cryptosporidium* as the representative group for protozoa and found at least (minimum) 2 log<sub>10</sub> reductions are achieved at the Lake Wivenhoe Dam Wall Offtake. Based on the *Clostridium perfringens* concentration in PRW supplied of 2 spores/100mL and the application of 2 log<sub>10</sub> reductions, the probability of exceedance of *Clostridium perfringens* from PRW at the Lake Wivenhoe Dam Wall Offtake is low.

The research undertaken for the Scheme concluded in general that pathogen inputs from the Lake Wivenhoe catchment played a more important role in source water pathogen risk at the Lake Wivenhoe Dam Wall Offtake than from a hypothetical low probability multibarrier failure of an AWTP.

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## 3.2. Interim Water Quality Values

There were 26 instances in which samples returned a test result greater than an IWQV for the reporting period. The parameters were bromochloroacetic acid, dibromoacetic acid and n-Nitrosodibutylamine (NDBA) and the number of tests and dates are listed in Table 3.

While not being results for which the concentration of a parameter was more than the value stated in Section 53 of the PHR, these screening values are used to inform the Monitoring Program and may be used to identify parameters for future development of standards for Section 53 of the PHR.

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**Table 3 Tests which returned a result greater than an Interim Water Quality Value from 13 December 2023**

Incident Number and date(s) reported	Parameter	IWQV	Type of sample and frequency required	Point(s) of Supply	Actual value(s) and date(s) sample(s) collected	Actual value(s) and date(s) sample(s) collected
Non-reportable	Bromochloroacetic Acid	0.03 µg/L	Grab sample Monthly	Lake Wivenhoe Point of Supply <sup>1</sup>	1 µg/L	2/07/2024
					0.4 µg/L	6/08/2024
					1 µg/L	30/09/2024
					0.3 µg/L	1/10/2024
					1.5 µg/L	5/11/2024
					0.5 µg/L	6/01/2025
					0.6 µg/L	7/01/2025
					0.8 µg/L	11/02/2025
					0.6 µg/L	17/03/2025
					0.4 µg/L	8/04/2025
					0.4 µg/L	6/05/2025
					0.9 µg/L	3/06/2025
					Grab sample Monthly	Luggage Point AWTP Point of Supply
			0.5 µg/L	7/11/2024		
0.2 µg/L	13/03/2025					
Non-reportable	Dibromoacetic Acid	0.1 µg/L	Grab sample Monthly	Lake Wivenhoe Point of Supply <sup>1</sup>	0.3 µg/L	2/07/2024
					0.2 µg/L	6/08/2024
					0.7 µg/L	30/09/2024
					0.2 µg/L	1/10/2024
					0.5 µg/L	6/01/2025
					0.6 µg/L	11/02/2025
					0.4 µg/L	17/03/2025
					0.2 µg/L	6/05/2025
					Grab sample Monthly	Luggage Point AWTP Point of Supply
			0.2 µg/L	7/11/2024		
Non-reportable	NDBA (n-Nitrosodibutylamine)	6 ng/L	Grab sample Monthly	Luggage Point AWTP Point of Supply	6.6 ng/L	23/07/2024

<sup>1</sup>Purified recycled water was not supplied to Lake Wivenhoe, however, Seqwater undertakes sampling from the Lake Wivenhoe Point of Supply when PRW is being supplied to Stanwell Corporation's Tarong Power Station.

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## 4. Monitoring Program compliance

It is a condition of the current Information Notice for the Decision that if the quality of purified recycled water produced by the Scheme is tested for the presence of a parameter in accordance with the Monitoring Program at the:

- AWTP Points of Supply; and
- Lake Wivenhoe Point of Supply,

and a test result of 'no result' or 'laboratory error' is recorded, a supplementary sample must be conducted and instances of a test result of 'no result' or 'laboratory error' is reported to the Regulator in this report.

This report must contain the details of all instances of a test result of 'no result' or 'laboratory error' and explanation if a supplementary sample was conducted prior to the next scheduled test. Compliance for the Luggage Point AWTP Point of Supply and Lake Wivenhoe Point of Supply is described in Section 4.1.

In addition, Seqwater is reporting instances where a test result of 'no result' or 'laboratory error' has been recorded for the Points of Supply for energy generation in Section 4.2 and a summary of source water (treated wastewater) testing in Section 4.3.

### 4.1. Non-compliance with water quality criteria: failure to test or missing data

A total of 47,891 tests for 720 parameters were undertaken in the reporting period at the Luggage Point AWTP and Lake Wivenhoe Points of Supply. There were no tests in the reporting period that returned a result equivalent to 'no result' or 'laboratory error' for Luggage Point AWTP or Lake Wivenhoe PoS .

### 4.2. Points of supply for energy generation where test result of 'no result' or 'laboratory error' occurred

A total of 2,456 tests were undertaken at the points of supply for energy generation. One sample event, totalling 18 tests, occurred in the reporting period in which the scheduled weekly suite of tests was unable to be collected in the week that PRW was supplied to the Tarong Power Station Point of Supply. This is noted in Table 4 along with contributing factors and corrective actions. Replacement samples were collected.

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Table 4 Points of supply for energy generation where test result of 'no result' or 'laboratory error' was reported

Incident Number and date notified	Parameter(s)	Frequency of test	Required number of tests over the year	Number of tests taken at scheduled frequency	Number of scheduled frequency tests missed	Contributing factors and improvements
Non-reportable 1 July 2024	Boron Copper Manganese Alkalinity Aluminium Calcium Chlorine Hardness as CaCO <sub>3</sub> pH Total dissolved solids (TDS) Total Nitrogen Total Phosphorus Turbidity Zinc <i>Clostridium perfringens</i> <i>Escherichia coli</i> F-specific RNA coliphages somatic coliphages	Weekly	720	702	18	One for each parameter for Stanwell Corporation's Tarong Power Station PoS Scheduled samples: week ending 1 July 2024 Replacement samples: 3 July 2024. Weekly sampling suite missed due to no water being supplied when routine sampling was scheduled.

### 4.3. Source water (treated wastewater) testing

A total of 46,235 tests were undertaken on source water (treated wastewater) supplied from six of Urban Utilities STPs that make up the Scheme. A consolidated dataset from the source water verification monitoring program is provided within Enclosure 1. For the current reporting period, the most recent round of source water test results from passive samplers were not available at the time of this report. This is due to standard turnaround times for this analysis. These results will once again be reported in the next reporting period.

All source water test results from passive samplers for the previous reporting period (2023-2024) are issued in Enclosure 3 of this report. These results were not available to report in the previous reporting period due to delays in supply chain issues with the external testing laboratory.

## 5. Prescribed incidents

There are no incidents prescribed under the Act.

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## 6. Reviews

Seqwater conducted a regular review of the RWMP as scheduled within the reporting period. The review of the WCRWS RWMP indicated the RWMP should be changed to be consistent with best practice industry standards for the production and supply of recycled water, in accordance with Section 259 of the Act. This incorporated document and information currency of Seqwater’s Scheme Manager Plan (SMP), Seqwater’s Scheme Provider Plan (SPP), Urban Utilities Scheme Provider Plan (SPP). Updates to Appendices and Supporting Documentation included the WCRWS Risk Assessment, Monitoring Program, the process for deriving and applying Interim Water Quality Values (IWQV), derivation of additional IWQVs, updates to the Improvement Plan, relevant Opportunities for Improvement (OFIs) identified in the internal audit of the WCRWS RWMP (as described in Section 7) and various other minor updates to ensure currency of documentation relevant to Seqwater and Urban Utilities operations of the WCRWS. Overall, the review did not identify unacceptable risks.

The amendment application was made within 60 business days of the completion of the review, in accordance with Section 259 of the Act. Any amendments approved by the Regulator resulting from this review and application to amend the RWMP will apply to the 2025-2026 reporting period and are not applicable to this report.

## 7. Audits

### 7.1. Internal audits under s260 of the Act

Seqwater, as the Scheme Manager, undertook an internal audit of the RWMP to assess compliance with the RWMP and its conditions in July 2024. The audit was conducted in accordance with the *Recycled water management plan Audit reporting guideline (September 2010)* and was completed before the 31 August 2024 as required by the current Information Notice for the Decision. The audit report was submitted to the Regulator within 30 business days of completing the internal audit.

There were no non-conformances with the approved RWMP or conditions of the current Information Notice for the Decision. There were 12 opportunities for improvement (OFIs) identified during the audit to strengthen treatment operations and/or managed of recycled water quality. Details of these OFIs, recommendations and status at the end of the reporting period are summarised in Table 5.

**Table 5 Details of internal audit of RWMP relevant to the reporting period**

Regular audit finding	Details	Action taken or planned to be taken in reporting period
OFI1	<p><b>Statements and figures in the RWMP – process flow</b></p> <p>Establish a process where the process flow diagrams are verified as accurate and reflective of current operating conditions. For example, this could be undertaken as a task when the risk assessment is reviewed. In addition, consider reproducing the same process flow diagrams for consistency in the Seqwater and UU plans.</p>	<p><b>Closed.</b> The most recent Scheme Risk Assessment review was undertaken as part of the RWMP review in March 2025 and incorporated on site verification of flow diagrams. The updated verified diagrams were included in the RWMP amendment submitted in the reporting period and this verification process was additionally also described in the RWMP amendment submitted in the reporting period.</p>

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Regular audit finding	Details	Action taken or planned to be taken in reporting period
OFI2	<p><b>Statements and figures in the RWMP – control measures</b> Review and update the Trade Waste Environmental Management Plan (MP11 2019) and the Tankered Waste Management Plan (MP75 2014, review underway). In addition, review Table 6-5 (wastewater KPIs) of UU's Plan (e.g. trade waste compliance inspections are not reported at business level).</p>	<p><b>In progress.</b> KPIs in Table 6-5 of UU SPP were reviewed with no changes required. They remain relevant and current.  The UU Trade Waste Environmental Management Plan (MP11 2019) is under review as at the end of the reporting period.</p>
OFI3	<p><b>Statements and figures in the RWMP – control measures</b> Repair the loose mesh at the side of top right-hand corner when you walk up the stairs of the Luggage Point treated water tank at the Gibson Island AWTP. In addition, consider a better sealed cover on the overflow passage walkway at the top of the Luggage Point treated water tank at the Gibson Island AWTP. There may be potential entry/gap for vermin/rodents into the tank from this point.</p>	<p><b>Closed.</b> Mesh repair at the Luggage Point AWTP PRW tank located at the Gibson Island AWTP site completed July 2024. The grid mesh walkway was replaced with a solid checker plate panel walkway. To prevent further recurrence, the contracted Operator's asset inspection item(s) were reviewed to ensure relevant to the issues identified to prevent similar issues being overlooked going forward.</p>
OFI4	<p><b>Procedures and procedural requirements of the RWMP: - incident and emergency response - communication protocols</b> Establish a process for undertaking periodic (e.g. every 2 years) recycled water quality specific incident exercise / scenario testing involving key stakeholders (Seqwater, UU, Veolia, regulators), including public health risk assessments</p>	<p><b>Closed.</b> Seqwater has a process of testing its incident and emergency response plans by conducting emergency response scenarios. Additionally, it undertakes annual exercises that include participants from other entities, regulators and disaster management organisations. Exercises are planned and audited in accordance with Seqwater's Emergency Exercise Procedure and this process has now been more thoroughly described in the RWMP amendment submitted in the reporting period.</p>
OFI5	<p><b>Procedures and procedural requirements of the RWMP: - maintenance and calibration</b> Review the follow up process and record keeping on delayed instrument calibrations at the STP. The records should contain commentary on delays. In addition, review the calibration recording form. It is not clear on what triggers a re-calibration from the standard check (the acceptable deviation range).</p>	<p><b>In progress.</b> Urban Utilities changed maintenance providers at the beginning of the subsequent reporting period. Further checks on this OFI (record keeping for maintenance calibration) will be required over the subsequent reporting period.</p>
OFI6	<p><b>Procedures and procedural requirements of the RWMP: - maintenance and calibration</b> Maintain training records for any sub-contractor who undertakes calibration activity on the instruments (e.g. a contracted electrician).</p>	<p><b>Closed.</b> The contracted Operator has implemented a critical analyser skills assessment process and procedure.</p>

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Regular audit finding	Details	Action taken or planned to be taken in reporting period
OF17	<b>Operational Monitoring</b> Establish a process to periodically (e.g. 1-2 years) test the CCP critical limit alarm and shutdown feature to verify that it is operational.	<b>Closed.</b> The contracted Operator has developed and enacted a new preventative maintenance activity for CCP critical limit alarm and shutdown.
OF18	<b>Verification Monitoring</b> Amend the Scheme Manager and Provider RWMPs, in Section 6.3.1 and any associated figure/s, in relation to the sample point for Stanwell Corp (at the next review of the RWMP or as a minor amendment).	<b>Closed.</b> Details of the sample point were updated in the RWMP amendment submitted in the reporting period. However, the sample tap relocation continued to progress to address the sample integrity and representativeness issues. It was not feasible to construct new pipework to create an air gap or install a double isolation at the existing location.
OF19	<b>Verification Monitoring</b> Review and update the RWMP in relation to monitoring, including removing references to REF 200 and REF 130 documents.	<b>Closed.</b> References to these documents were updated in the RWMP amendment submitted in the reporting period.
OF110	<b>Corrective and preventive actions</b> Utilise a software to capture and manage operational water quality breaches at the STP, corrective actions undertaken, and any improvements identified. [This is underway with the new Urban Governance and Risk Compliance (GRC) software to be implemented, which will include an incident module].	<b>Closed.</b> UU Governance, Risk and Compliance tool went live in the reporting period, incorporating a new reporting system.
OF111	<b>Stop supply - permanent stoppage, temporary stoppage, stop supply to users (conditions 8.15, 8.16, 8.17)</b> Review operating protocols with all PRW users to ensure they are current.	<b>In progress.</b> Operating protocols to Stanwell Corporation and CleanCo were updated within the reporting period. Operating protocols with UU are planned to be updated in the subsequent reporting period.
OF112	<b>Stop supply - permanent stoppage, temporary stoppage, stop supply to users (conditions 8.15, 8.16, 8.17)</b> Review the RWMP (SMP and SPP) in relation to need for any onsite controls and where/how these would be captured, if relevant.	<b>Closed.</b> The RWMP (SMP and SPP) have been reviewed and updated in relation to need for any onsite controls and where/how these would be captured, if relevant. This update was included in the RWMP amendment submitted in the reporting period.

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## 7.2. Regular audits under s261 of the Act

There were no regular external audits in the reporting period. The next regular external audit of the approved RWMP is due August 2026 as required by the current Information Notice for the Decision.

There is one Opportunity for Improvement (OFI) that is progressing but remains to be closed from the regular audit given to the Regulator in the 2022-2023 reporting period. The OFI relates to the implementation of a Laboratory Information Management System (LIMS) as summarised in Table 6.

**Table 6 Details of regular (external) audit of RWMP relevant to the reporting period**

Regular audit finding	Details	Action taken or planned to be taken
OFI	Consideration should be given to implementing a Laboratory Information Management System (LIMS) to schedule, oversee, manage, and report the verification monitoring program, or seeking support from a laboratory services provider to undertake that function	LIMS system approvals complete. Implementation continued through the reporting period and continues to progress.

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## 8. Glossary

Term	Definition
AWTP	Advanced Water Treatment Plant
current Information Notice for the Decision	The Information Notice for the Decision current for the reporting period, dated 13 December 2023 as amended 22 January 2024.
DLGWV	Department of Local Government, Water and Volunteers – see Regulator
Guidelines	<i>Annual Reporting Guidelines for Recycled Water Schemes (2010)</i>
Head Office	Level 8, 117 Brisbane Street, Ipswich QLD 4305
ML	Mega Litres (1 Million Litres)
mL	Millilitre (1000th of a litre). 1 cubic centimetre
OFI	Opportunity for Improvement
PHR	<i>Public Health Regulation 2018 (Qld)</i>
PRW	Purified Recycled Water produced by the WCRWS
Regulator (the Regulator)	Department of Local Government, Water and Volunteers, Water Supply Regulation (i.e., the Director-General of DLGWV) is responsible for regulating water service provider performance, drinking water quality and provision of recycled water <sup>2</sup>
Reporting period	1 July 2024 to 30 June 2025
RWMP	Recycled Water Management Plan
Seqwater	Queensland Bulk Water Supply Authority (QBWSA)
SMP	Scheme Manager Recycled Water Management Plan
STP	Sewage Treatment Plant
The Act	<i>Water Supply (Safety and Reliability) Act 2008 (Qld)</i>
The Scheme	Western Corridor Recycled Water Scheme – see WCRWS
Urban Utilities	Urban Utilities – Central SEQ Distributor-Retailer Authority (formerly known as Queensland Urban Utilities)
Veolia	Veolia Australia & New Zealand (the contracted Operator)
WCRWS	Western Corridor Recycled Water Scheme

<sup>2</sup> As part of the machinery-of-government changes, effective 1 November 2024, the Department of Regional Development, Manufacturing and Water was renamed the Department of Local Government, Water and Volunteers

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## 9. Enclosures

Enclosure	Name
1	Source water (treated wastewater) annual water quality report 2024-2025
2a	Luggage Point AWTP Point of Supply assessment against augmentation of a drinking water supply water quality criteria 2024-2025
2b	Lake Wivenhoe Point of Supply assessment against augmentation of a drinking water supply water quality criteria 2024-2025
3	Source water (treated wastewater) annual water quality report 2023-2024 for passive sample data not available at the time of the previous publication of the annual report

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