

23 April 2020

Hydraulic Consultants Association of Australasia  
PO Box 583  
NORTH SYDNEY NSW 2059  
Attention: David Wood

**Review of FPAA101D – Automatic Fire Sprinkler System Design and Installation  
Drinking Water Supply (December 2018)**

Dear David,

Sydney Water values the importance of fire protection systems and the significance that the installation plays in protecting lives during significant fire events.

We have undertaken a comprehensive review of the code to ensure that all impacts of the proposal have been duly considered, including the obligations under our operating license, customer contract and directives from our pricing regulator, IPART.

In this instance Sydney Water cannot endorse the document or plumbing installations that follow the principles of FPAA101D for the following reasons:

1. Placing the sprinkler offtake before the individual unit meter means that water used by a toilet will not be measured and paid for by the owner/tenant, with the water used being paid for by body corporate. This reduces the effectiveness of individual metering and the IPART endorsed approach of the “user pays” principle.
2. Toilet cisterns are the largest cause of leaks in units and putting them onto a shared supply means there is no ability to provide a “leak alert” from the individual dwelling metering system and hence there is no price signal/incentive to keep these in good order. This leads to inefficient water use.
3. The accuracy of measuring the sprinkler/toilet water will be reduced as the low flows use of the cistern will not be accurately measured by the larger boundary meter. Again, this fails to follow the “user pays” principles and reduces the effectiveness of sustainable water use.
4. Connecting the fire sprinkler service to the common potable water service, introduces a backflow contamination risk which currently does not exist. As proposed, the backflow containment device for each unit will need to be replaced on a regular basis, as a non-testable backflow device, has a limited span of effectiveness. This proposal adds additional costs to all property owners that currently doesn't exist and increase the risk of contamination if not managed appropriately.

While Sydney Water does not regulate private plumbing in NSW, we are concerned about the additional complexities introduced by the proposal and additional costs to our customers.

Customers connecting to Sydney Water's water supply network will need to comply with our current connection and metering guidelines.

If you have any further questions please contact Duncan Laurie – Manager, Planning & Technical on 8849 5912 or via email at [DeveloperConnections@sydneywater.com.au](mailto:DeveloperConnections@sydneywater.com.au)

Yours Sincerely



Jason Dagger  
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