

"Draft Comments relating to EPL 372 for the Southern Suburbs Sewage Treatment System

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Background and Discussion

GREA is a network of individuals and groups with a strong interest in protecting biodiversity, environmental quality and related resident wellbeing specifically within the Georges River catchment, but also more broadly throughout southern Sydney.

Our prime concern is for the health of the Georges River, as it is the key environmental and recreational asset of our region. For that reason the comments we make specifically relate to the Environmental Protection Licence (EPL) 372 which is relevant to river health in the Georges and Cooks River systems as they are receiving waters for any failures at the STP's of Fairfield, Glenfield and Liverpool,(which are part of the greater Malabar system), and for any overflows or leaks at the designed discharge points on the major and minor connected sewer lines, including particularly the North Georges River Submain (NGRS).

We believe that sewer overflows, whilst not the only pollution threat to our river, should be a major focus for environmental protection and improvement, as they are largely traceable to their sources of origin, and thus feasibly managed. Fundamentally this is the major difference between point source sewer overflows and the more intractable problem of diffuse urban runoff. The manager of our sewage system, Sydney Water, is a public entity with a clearly stated statutory and ethical responsibility to operate their waste water disposal system efficiently and with minimal impact on receiving waters. It is important that the regulator, the EPA, ensures 'best practise' is modelled by Sydney Water. Both Sydney Water and the EPA are highly accountable in this regard. Both organisations have both a lot to gain and a lot to lose in terms of public trust.

GREA would comment that in the recent past Sydney Water has not made a clear and compelling case to the interested public that they are operating their systems efficiently or in a way that is consistent with the maintenance of the health of the Georges River.. Nor does there appear to be any tangible evidence reported to the public by the EPA that any of the Pollution Reduction Programs (PRP's 302, 303, 700, 801) have made a measurable difference.

Our evidence is quite to the contrary. We were most alarmed that in Decembver 2013, a major plant malfunction at Glenfield led to a huge spillage of raw sewage into the Georges River, in one of the most ecologically fragile and poorly flushed reaches of the river, the impoundment behind the Liverpool Weir. <http://www.dailytelegraph.com.au/newslocal/macarthur/glenfield-sewage-spill-forces-sydney-water-to-cough-up-200k/story-fngr8h70-1227150986186>

That disastrous event and subsequent river closure for most of its length, did a great deal to harm river health, living things dependent upon it, and eroded the public perception of the river's worth. Furthermore this incident damaged, quite deservedly, the reputation of both Sydney Water, and its regulator, the EPA.

Our further evidence has been gathered by a very diligent local group over a 3 year period. A group of community members representing Oatley Flora and Fauna Society, Friends of Oatley Inc., Bushcare and Streamwatch participants, have been monitoring and recording sewer overflows from the NGRS at the Lime Kiln Bay Wetlands in Oatley, which empties into the lower estuary of the Georges River. This effort has resulted in continued dialogue with the local member, and considerable media interest.

<http://www.smh.com.au/environment/bankstown-residents-accuse-sydney-water-over-sewage-overflow-plan-20131217-2zjax.html>

<http://www.smh.com.au/environment/water-issues/making-a-stink-about-georges-river-overflows-20131215-2zfcx.html>

<http://www.theleader.com.au/story/2129881/salt-pan-creek-in-the-clear/>

It also resulted in a response from Sydney Water, with a community consultation and some localized infrastructure works that have eased the problem at this site.

<http://www.sydneywatertalk.com.au/limekilnbay/files/2014/03/Lime-Kiln-Bay-site-visit-notes-010214.pdf>

The findings of that Oatley based group were that since our monitoring has begun there are an average of 8.8 overflows each year, which would result in more than 80 over 10 years. (See Appendix One; (i) Geoff Francis comments based on the Spreadsheet he has compiled, and available on request) There are a number of disturbing aspects that follow on from this case;

1. The ecological and aesthetic results of these overflows are totally unacceptable to the local community.
2. There are no plans for large scale systemic improvement to the NGRS to counter this trend, despite the fact that we have had over the last few years a number of meetings with Sydney Water. Not only do we think infrastructure needs improvement, but there is also a need for Sydney Water to engage with communities and councils to solve problems in a lateral sense.(see Appendix One;(ii) Brian Shaw's comments)
3. We are aware that Sydney Water has instituted a small scale engineered solution at Lime Kiln Bay Wetlands, in response to a controversy generated by a very vocal and well organized local group. This is just one overflow structure in a catchment where we believe there are more than 700 others! (see Kim Wagstaff's comments Appendix;(iii) It is quite possible far worse overflow performances are going unrecognized, with no remedial response, at a multitude of localities both upstream and downstream. Certainly at meetings, Sydney Water personnel have reported that there are very significant sewer overflow problems in the upper estuary (ie around the confluence of Prospect Ck and the Georges River)
4. There is no justification at all for the undervaluing of the Georges River system. It has been proposed in an EPA PRP, a reasonable standard for the Georges will be between 5-45 overflows in 10 years to be achieved by 2021. Yet the standard for the Warriewood STP reticulation system, on the north side of the Harbour, is already less than 31 in 10 years (Lic. No. 1784). This is a matter of social and environmental inequity, We don't believe that the GR should be treated as a second class river system.

What does GREA want out of this Licensing Review?

- **An EPL that expects fewer overflow events from licensed sewer overflow points and of lesser volumes, and standards for the Georges River that reflect this. The proposed 5-44 to be**

achieved by 2021 is not good enough, and Georges river standards should be at least the equivalent of the Warriewood standards.

- **Transparent processes, community consultation built into PRP's and measurable standards and performance reviews that are reported in plain language to the interested public.**

Thank You for the opportunity to comment.

Sharyn Cullis

Appendix; Highly valued comments from individuals who have been consulted in the preparation of this Submission, and who take an active interest in Swage issues in the Georges and Cooks River catchments.

(i) Geoff Francis

Since March 2012 we have been averaging 8.8 sewage spills per year from the NGRS at Dairy Creek (until last November) and Myles Dunphy Creek. However, the upgrade to the Dairy Creek overflow completed in December 2014 has greatly reduced the number of spills here. Despite the recent heavy rain, the period from 2012 to April 2015 has not been abnormally wet, so the 8.8 spills per year is probably fairly close to the average over a 10 year period (over 80 per 10 years).

Sydney Water's existing EPA licence allows it to have in excess of 40 overflows per 10 years, but it is up for renewal and is being renegotiated. The actual number of overflows has been well in excess of this. Sydney Water actually admitted this at the Community Reference Group meeting in February 2014. They estimated then that there were 60 overflows per 10 years at Dairy Creek and 65 per 10 years at Roberts Avenue.

In other parts of Sydney overflow licences are less generous to the polluter. At the community reference meetings in 2013, Rod Kerr justified the higher number of overflows licenced for the NGRS on the basis that there was so much good quality water coming into the Georges River estuary from stream on its south side which drain largely bushland catchments. This meant that it could take more pollution coming in from the north! This is very dubious.

(ii) Brian Shaw

Commends Melbourne Water for their program of 10,000 Rain Gardens that absorb stormwater, and suggests that Sydney Water could look at this strategy to reduce stormwater ingress into the sewer system.

(iii) Kim Wagstaff

It is acknowledged that a Wet Weather Overflow Abatement Pollution Reduction Program 2014-2016 (U4.2 Lime Kiln Bay Wet Weather Overflow Abatement) was recently added to the licence. This requires that "By 30 June 2015 the licensee must undertake all works and actions necessary to reduce the number of wet weather overflows from the North Georges River Submain at Dairy Creek to no more than 10 overflows per 10 years."

However, this refers to just one of the 727 designed overflow points on the Georges River and it simply diverts the overflows from that point to other nearby locations which still empty into the Georges River. It does reduce the impact on the valuable council asset of the Lime Kiln Bay Wetlands however the total ultimate impact on the Georges River remains about the same."