

Review of Sydney Water Corporation's Environment Protection Licences for sewage treatment

I would like to provide comment to the above review particularly in relation to the Southern Suburbs Licence No. 372 (Malabar)

1. In the current licence there is a requirement to undertake investigations, works and activities capable of achieving the long term 2021 targets of 5 - 44 wet weather overflows per 10 years. (U2.1 and U2.2). In other words these limits are not in place yet and will not be until 2021. So these rates of wet weather overflow are likely to be, and on the basis of the last 3 years experience definitely being, exceeded. Further, the total number of dry weather overflows reaching waterways from the sewage treatment system subject to this licence must not exceed 122 in any reporting period.

By way of comparison the frequency of wet weather overflows from the reticulation system in the Warriewood Sewage Treatment System (Licence No. 1784 in the northern beaches suburbs of Sydney) already must not exceed 31 overflows per 10 years (and I understand this is as low as 20 overflows per 10 years in some parts of the catchment). In addition, the total number of dry weather overflows reaching waterways from the sewage treatment system subject to this licence must not exceed 9 in any reporting period.

So the question must be asked why are the two systems and their local environments and populations being treated differently?

We on the Georges River value what we have just as highly as those on the northern beaches.

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.

2. In regard to the above wet and dry weather overflow limits the question should also be asked: Is this the best way to measure the impact of the overflows on the environment? (ie frequency of overflows). Perhaps SWC should be moving to a more

sophisticated, and hopefully more accurate, measurement. I presume this would be a combination of volume, concentration, timing, and perhaps sensitivity of receiving environment.

3. I would like to see much more effort in future works programs placed on reducing stormwater inflow and infiltration to the system. I believe this will be of much greater benefit in reducing impacts of wet weather overflows than individual piecemeal projects. As they say, prevention is better than cure. In this regard it is good to see that a project in the Wolli Creek wastewater catchment has been built into the Wet weather overflow abatement Pollution Reduction Program 2014-2016. (U4.4 Wolli Creek Wet Weather Overflow Abatement)

Applying the results of this project to the Georges River catchments should be accorded the highest priority for future PRPs under this Licence.

In regard to stormwater inflow and infiltration to private sewers I believe there is great scope for SWC to work with local councils in monitoring and checking compliance with the relevant regulations. Councils (and private certifiers) are obviously closely involved in the building and development processes and are in a good position (although not necessarily well resourced) to provide this oversight.

The government should consider developing a scheme similar to the one for checking swimming pool compliance. A house with a swimming pool cannot be sold without a certificate of compliance for the pool. This inspection is paid for by the seller of the house and hence puts the cost onto the beneficiary of the inspection and associated safety outcomes which is where it belongs. The same principles could apply to checking of private sewers both at the time of sale and when submitting a development application. It would not alleviate the need for a wider program of inspections on houses not picked up in this way but would go a long way towards improving the current situation where up to 45% of inflow and infiltration to the sewerage system comes from private property.

4. In regard to this consultation process I believe a public meeting should be held to give the public an opportunity to ask questions and make comments so that we could be better informed about the systems, how they are operated and what opportunities there are for improving our environments. Many people are better able to express themselves in words rather than in writing and a public meeting or series of meetings at convenient locations throughout the SWC areas would very much help with the consultation process.

Thank you for the opportunity to comment.

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