

## **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) Accountability**

There is a need for Sydney Water and NSW Environment Protection Authority (EPA) to show the public that they are operating in a way that is working to improve the health of the Georges River. **The Glenfield plant malfunction** Dec 2013 was an event that damaged the river health and eroded the public perception of Sydney Water and the EPA. <http://www.dailytelegraph.com.au/newslocal/macarthur/glenfield-sewage-spill-forces-sydney-water-to-cough-up-200k/story-fngr8h70-1227150986186>

### **2) Community need to be informed and consulted in licensing**

The call for submissions was not very well advertised or promoted. Public meetings should have been held to promote the submission process and to provide information about the systems on how they are operated and what opportunities there are for improving our environments.

### **3) Are works being undertaken to meet 2021 Targets**

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). <http://www.epa.nsw.gov.au/prpoeoapp/ViewPOEONotice.aspx?DOCID=1&SYSUID=1&LICID=1519252>

I have been involved in a local group of community members representing Oatley Flora and Fauna Conservation Society, Friends of Oatley Inc., Bushcare and Streamwatch participants, who have been monitoring and recording sewer overflows from the North Georges River Submain (NGRS) at the Lime Kiln Bay Wetlands in Oatley, which empties into the lower estuary of the Georges River. On the basis of the last 3 years monitoring there are an average of 8.8 overflows each year, which would result in more than 80 overflows in 10 years.

### **4) Diversion of overflows is not an acceptable solution**

Sydney Water has instituted a small scale engineered solution at Lime Kiln Bay Wetlands, in response to a controversy generated by a local group but this is just one overflow structure in a catchment where there are over 700 overflow points on the Georges River. It simply diverts the overflows from that point to other nearby locations which still empty into the Georges River. While this reduced the impact on the Lime Kiln Bay Wetlands, the total impact on the Georges River remains about the same.

## **5) Overflow licensing is not equitable across Sydney**

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 (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. 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.

## **6) Monitoring method**

Is frequency of overflows the best way to measure the impact of the overflows on the environment? A combination of volume, concentration, timing, and perhaps sensitivity of receiving environment should be taken into consideration.

## **7) Source control approach is needed**

### a) Water Sensitive Urban design (WSUD) required

Sydney Water has indicated at several Lime Kiln Bay Reference Group Community meetings that I have attended that storm water ingress into the sewer system greatly adds to volumes to be carried by the NGRS. For example rain gardens project could be initiated to reduce the storm water flow into the sewer system. Melbourne Water successfully reached its 10,000 rain garden project with residential homes, schools and local government working to capture otherwise wasted water.  
<http://melbournewater.com.au/aboutus/news/Pages/10,000-Raingardens---just-the-beginning.aspx>

### b) Compliance certificates

The government should consider developing a scheme similar to the one for checking swimming pool compliance. 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.

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 licences and limits are acceptable to the public.

Melina Amerasinghe  
20 Lloyd Street  
Oatley, NSW 2223