

The Recreational Fishing Alliance of NSW

"Promoting Sustainable Fishing"

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Mr Scott Jefferies
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Department of Planning
23 – 33 Bridge St.
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Western Sydney Recycled Initiative

Replacement Flows Project Environmental Assessment

Dear Mr Jefferies,

Introduction:

The Recreational Fishing Alliance of New South Wales (RFA) provides the following submission on the above project. Thank you for extending the submission date by four days. This is the first submission from the RFA relating to sewerage disposal. We have discovered that there is significant information available on the Sydney Water (SW) web site however finding exactly what you are seeking and understanding it are difficult. The comments offered are more of the bigger picture rather than comments relating to specific engineering or technical issues and we hope to come up to speed on this issue over time. Unfortunately insufficient time has been available to comment on the impacts of the ocean deposits.

We refer to the information contained on the Sydney Water (SW) web site and the information and discussion that flowed from a meeting held on 30th November, 2006 at South Windsor, chaired by Ms Mary Howard. The following groups were represented at that meeting: Commercial fishers, Recreational Fishing Alliance of New South Wales (RFA), Australia National Sportfishing Association, Dept of Primary Industries (DPI), Oceanwatch and representatives of local recreational fishing clubs.

The RFA of NSW is a body consisting of peak recreational fishing groups such as Australian National Sportfishing Association of NSW (ANSA), NSW Fishing Clubs Australia (NSWFCA), NSW Council of Freshwater Anglers (NSWCFA) and the Underwater Freedivers Association (UFA). RFA members have various positions on State Government fishing and Trust Fund Committees.

The RFA is aware that currently there is a shortage of clean drinking water and this water shortage is causing concern to Sydney communities as well as Regional NSW. It is accepted this need is of the highest priority.

Environmental issues:

It is important however that environmental issues need serious consideration before adopting alternative processing methods for Sewerage Treatment Plants (STW). The SW Flows Project is significantly changing the way SW provides services to the western growth areas of Sydney.

In delivering this project the community has an expectation from the State Government that it will ensure the necessary Agencies recognise the responsibility for the environmental, commercial and recreational fishing impacts that will result in the longer term in using the Hawkesbury Nepean River (HNR) as a drainage basin for sewerage waste. As SW is delivering the project it would seem this responsibility must fall within their responsibility and they should identify the risks associated with

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RFA of NSW - Member of NSW Recreational Fishing Trust Fund Expenditure Committee
- Associate member with the NSW Advisory Council on Recreational Fishing to
RECFISH, National Peak Recreational Fishing Body

their proposed delivery process. The long term impacts for SW could be significantly greater than alternative service delivery options. This project follows the old thinking that the waste can be deposited into the HNR river which is the same method utilised by SW with their previously constructed STP. With current demands and projected population growth for both the North West and South West Sector of Sydney the amount of treated effluent that will be deposited into the HNR and its tributaries will be very significant.

It is accepted SW are trying to reuse treated effluent but the percentage is still quite low. The quality of the treated sewerage currently being released need significant purification for those areas such as North Richmond that draw water from the HNR for drinking purposes. If treatment is necessary to purify the water for consumers what purification is provided for the HNR itself?

The environment assessment states “that the project has been developed to minimise its impacts on these environment aspects, where ever possible the impacts would be managed through recognised procedures”. The difficulty with this is that if other agencies want to question, test or carry out research on the quality of the sewerage waste or sediment it will be up to these Agencies to seek funding from an alternative source which is usually limited. It is suggested that SW needs to take more ownership of this issue.

The Western Sydney Recycle Initiative largely relies on changes to weirs and the Water Sharing Plan (WSP) which is to be released next year. It is our understanding that those who are legally permitted to draw water under current arrangements are irate about the new proposal. It is considered that this issue will need further discussion and resolution. Without a final outcome of these negotiations the projected flows from the weirs are only theoretical and may not eventuate. Will the project be reviewed if these projected flows are not achieved? The RFA is of the view that this project needs to be considered concurrently when the WSP is resolved and total assessments of SW proposal can be re-evaluated.

The meeting was advised the project will see a decline in the quantity and quality of water in South Creek that enters the HNR. Although sewerage will be treated at the proposed new Quakers Hill STP the environment assessment states that discharge volumes from existing STP's at Quakers Hill, St Marys and Riverstone (growth area) are still significant yet no hydrological impacts on the associated estuaries has been undertaken. It is also understood that although there are currently six monitoring stations in South Creek no specific monitoring of South Creek is proposed under this project!! This would seem to be unsatisfactory particularly considering the development that is occurring in this area and that treated water will continue to be drawn from South Creek for grazing, market gardens, poultry, farming and urban and industrial use.

The environment assessment does not cover the impact that could/will occur in regard to recreational fishing or other recreational activities in/on the HNR. There are numerous caravan parks, tourist locations, commercial business including recreational river guides that use the river or have established facilities close to or on the banks of the HNR, on the assumption that Government Agencies (such as the EPA) will protect their interests. Who is capturing community health data on skin, eyes, ears, and throat infections from skiing or swimming activities in the HNR?

As further STP's are constructed or upgraded there must come a point when a study must be undertaken to establish the overall health of the HNR. It has only been the lower part of the Nepean that has formed the key part of the study area for this project. When can we expect health warnings concerning the consumption of seafood from the HNR as we have seen recently in Parramatta River?

Additional STP's is planned for either construction or upgrading within the North and South West areas of Sydney in the medium to longer term. RFA expects that there will be a significant impact on the HNR as the sewerage effluent dramatically increases as these facility come on line.

The RFA is not aware of any SW Master Plan for the HNR that will protect and improve the health of these rivers. In recent years we have seen the river warning us, that all is not right. We have seen significant impact with weed growth, fish with disease and coloured spots, eels that are not surviving and the total destruction of a viable oyster industry which has been a major producer of quality Sydney Rock Oyster long before the introduction of many STPs!

The RFA is concerned that there appears to be no overall health policy for the HNR as each STP only considers local issues. SW's Ecologically Sustainable Development (ESD) Policy contains five principles, one being the precautionary principal to reduce the chance of serious environmental problems even if there is no certainty these problems will occur. The precautionary principal seems to have been washed out with the effluent on this occasion!

Planning considerations:

There are many existing STP's within the Catchment Area that deposit sewerage waste into the HNR and a number of these are planned for upgrade to accommodate future residential and commercial growth. When these STP's were initially established one of the design considerations would have been the quantity of clean water available from Warragamba Dam – but conditions have now changed and that water is no longer available under the current proposal.

All the new/modified STP's currently planned by SW for the Sydney western area intend distributing the majority of their waste into the HNR. The RFA is of the view that this form of waste distribution is not acceptable in this day and age and a long term solution/s need to be identified.

The Premier has recently announced a "State Plan". A plan developed from consultation with the community. The Plan makes a commitment to use recycled water not deposit it down a river system. It also makes a commitment to improve estuaries!

Considering there are some 19 STP depositing treated sewerage into the HNR what impact will this additional sewerage have on the total river/s? What overall research testing strategy is proposed for any new or modified STP? And what upgrading will be provided to the sites such as Riverstone, McGrath Hill STP's plus others?

SW state in their ESD Objectives that they will provide development that improves the quality of life both now and in the future in a way that maintains the ecological process on which life depends (National Water Strategy for ESD 1992)

It was pleasing to be informed by ABC Landline on 3rd Dec 06 that a study is continuing in the Hawkesbury with the view of identifying the cause of the QX infection that eliminated the Hawkesbury oyster a couple of years ago. Testing of the sediment continues by a Queensland scientist but at the same time SW continue to deposit sewerage without any offer to monitor the HNR with the best technology available today. The meeting was advised that the type of filtering would not be nominated rather a performance specification would have to be met by the successful contractor. The advice provided on the SW web site is that a micro system would be used with this STP project. What level of filtering is the community really getting and what will not be filtered out of the sewerage?

We understand that technology and funding are two important issues in delivering infrastructure to the Sydney Region however these issues should not negate the responsibility SW has on behalf of the State Government to maintain the health of the Hawkesbury Nepean Rivers.

The RFA recommends the following:

1. That the EPA insist that SW develop a Master Plan for the medium and long term for the North West and South West Sydney areas which impact on the HNR with the long term objective of zero sewerage entering these rivers or associated estuaries.
2. That a condition be placed on SW to conduct research to determine how human medication such as antibiotics, anti depressants and other chemicals mixtures including cleaning industrial products can be removed from their waste while they continue to deposit recycled sewerage into the HNP.
3. That SW review the project to determine if Local Govt., State Agencies, Universities, private and public schools, private and public golf clubs, parks and the like can utilise more recycled sewerage waste resulting in less deposits into the HNR.
4. In conjunction with item one, SW review the Master Plan and develop a new Sydney West Strategy that is consistent with the NSW Government's State Plan recently announced by the Premier which makes a commitment to improve the quality of estuaries.

5. That as a condition of the project SW implements a “best practice – before and after” research and testing program which carries out detailed research and testing of the full water column (including benthos and sediment) as part of the precautionary principal planning process prior to a project proceeding especially if any effluent will have access to a waterway directly or by seepage.

6. The Water Sharing Plan public consultation process is due for release in early 2007. Until this is resolved SW should not proceed with the project until those negotiations have been resolved with stakeholders and Dept of Natural Resources who has to address the approval/licence to extract water by stakeholders. The same applies to the proposed alterations to the existing upper stream weirs. Until this work is undertaken as part of the water user’s agreement specific water flows can not be accurately predicted.

7. That SW provide clarification if the West Camden STP upgrade has been factored into the presentation figures both for the short and long term effluent flows for the HNR.

8. SW has verbally agreed to undertake more research on issues/impacts associated with temperature controls of released effluent. To date RFA is not aware of any work being done on this issue by SW which has the potential to significantly change the ecology and increase weed growth. This should be a condition of any approval process.

9. That monitoring continue in South Creek as a precautionary principle until such time it can be demonstrated that the health of the creek has dramatically improved and monitoring is only required on an infrequent basis.

10. All testing results should be available on a regular and prompt basis and press releases issued to inform the community of any risk to public health and or commercial harvesting activities within the HNR.

Conclusion:

The RFA is concerned that there will be no environment flow from the Warragamba Dam under this proposal. This is a major concern as it may have an impact on the health of the river and on the breeding cycle of various fish species. It is considered that there should be an escape clause that allows fresh water to be released if there are health issues with the HNR and or if there is sufficient water in the Warragamba Dam to return to previous water flow arrangements.

The South Creek comments (stated above) are a concern. RFA would like to know if the outcome for this creek complies with the intention of the original scope of the project?

The precise quantity of water that will be permitted for extraction still has not been resolved by Dept of Natural Resources. If stakeholders negotiations fail, or extraction is more than expected or the predicted flows are not achieved then the HNR health will be an issue for further discussion. Water currently used by irrigators, grass farmers and the like needs to be resolved to enable all the facts of the project to be considered.

It is noted that a Memo of Understanding is in place with SW and Government Agencies, but it was not identified the same arrangement is in place with DPI. If this is correct, it is recommended that formal arrangements be made to include DPI(F) with a similar arrangement where projects will/have the potential to impact on estuaries, dams, impoundments, lakes, streams, creeks, harbours and the like including ocean waters.

The short time frame time available for submissions has not allowed the RFA to investigate the impacts this project will have on the sewerage proposed to be deposited at sea. The RFA would like to request that Dept of Planning and the EPA consider this issue carefully. We would be pleased to offer further comment on this part of the project should the community consultation period be extended.

The RFA would be pleased if we could be advised on the outcome of the issues and comments raised in this submission

Yours Sincerely

Max Castle - Vice President RFA
8th December 2006