

Author name: A. Mctyer

Date of submission: Wednesday, 9 May 2018

Submission: I oppose Solo Water's Network Operator Variation because it is not a variation but a completely different scheme. Therefore, both the current process of approval, and the current approving body, (IPART) are invalid. Specifically:

1) Solo Waste is now asking for a licence to discharge effluent into the environment, which they were not asking to do in the original scheme. Therefore, this new scheme requires a licence under the POEO Act, which will require rigorous effluent-quality measures.

2) Solo Waste MUST scientifically prove that the waste will not damage environment. A variation on a qualitatively different scheme (to the original proposed) is therefore both inadequate and inappropriate to properly assess the impacts. Instead, an EIS must be done, based on valid and rigorous water studies. Therefore, the NSW EPA -- and not IPART -- should be the determining authority.

3) Solo Waste has changed the wastewater treatment process without adequate consultation. Specifically, they first proposed RO, yet now have already built an ultra-filtration UF process. It is my opinion that Solo Waste has tried to sneak through a system that will cost them less, but at the expense of the environment and the community. It also gives the impression that IPART is colluding with the operator by letting this variation sneak under the radar without proper scientific study and without explicitly informing the community (except to publish it on the IPART website).

In summary, a determination needs to be made on facts around which is the best system in this context, not which is the cheapest for the operator. The creek opens naturally less than a couple of times a year (after all the rain in the last few weeks, it remains closed) and children regularly swim in the closed lagoon when it reaches the beach. Their health - and that of the environment - should not be risked without rigorous scientific proof that the effluent will not affect the lagoon's water quality in any way.