



## Mark Speakman

Minister for the Environment

MD16/3714  
D16/19983; 16 / 2-5

Mr Hugo Harmstorf  
Chief Executive Officer  
Independent Pricing and Regulatory Tribunal  
PO Box K35  
HAYMARKET NSW 1240

Dear Mr Harmstorf

### **Submission about Narara Eco Village Co-Operative Ltd's licence application**

Thank you for letter seeking my submission on Narara Eco Village Co-Operative Limited's licence application under the *Water Industry Competition Act 2006*. I note you have also written to the Environment Protection Authority (EPA). Please accept this as a response to all correspondence.

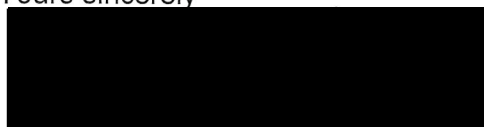
In early 2015 the EPA responded to an invitation to make a submission on an earlier version of the licence application. I am advised the current proposal is similar to the earlier proposal, and the advice provided previously remains relevant:

1. The EPA is not aware of any breaches of the *Protection of the Environment Operations Act 1997* (POEO Act) by Narara Eco Village Co-operative Ltd or Aquacell Pty Ltd.
2. The activity is not a scheduled activity under Clause 36 of Schedule 1 of the POEO Act and will not require an environment protection licence based on the peak daily operating volume of 24 kilolitres per day.
3. IPART should consult with Central Coast Council as the appropriate regulatory authority for the ongoing compliance of the proposed system with the POEO Act.
4. IPART should consider the *Environmental Guidelines Use of Effluent by Irrigation 2004* when assessing the application. The guide is available at [www.environment.nsw.gov.au/resources/water/effguide.pdf](http://www.environment.nsw.gov.au/resources/water/effguide.pdf).
5. Operators need to demonstrate that chemical impurities in the treated water do not exceed relevant recycled water guidelines or cause incremental accumulation of pollutants in soils or waters over time. Monitoring requirements and limit conditions should be considered.
6. Experience with similar wastewater recycling facilities indicates hydrogen sulphide odour emissions (H<sub>2</sub>S) can be problematic unless appropriate odour controls are designed, installed and operated.

7. The operational environmental management plan should include an assessment of any risks of pollution to waters. IPART should review the plan when it is available.
8. If the licence is granted, I recommend the licence include:
  - a. appropriate soil moisture monitoring and reporting conditions
  - b. appropriate rainfall triggers to prevent irrigation during high rainfall periods
  - c. annual soil monitoring reports to ensure the sustainability of the effluent irrigation area
  - d. volume and water quality monitoring at the discharge point to the irrigation area and water quality and volumetric limits
  - e. ambient water quality monitoring in any nearby waterway at high risk of impacts from the effluent irrigation area to ensure any impacts are detected and addressed
  - f. definition of the extent and size of the effluent irrigation area
  - g. surface and groundwater quality monitoring up gradient and down gradient from the effluent irrigation area to ensure irrigation activities are not polluting waters
  - h. conditions to ensure irrigation areas do not pollute waters, such as limiting ponding to prevent offsite migration of irrigated wastewaters.

If you have any further questions about this issue, please contact Mr Peter Jamieson, Head Regional Operations Unit – Hunter, EPA, on 4908 6818 or at [peter.jamieson@epa.nsw.gov.au](mailto:peter.jamieson@epa.nsw.gov.au).

Yours sincerely



14 SEP 2016

**Mark Speakman**  
**Minister for the Environment**