

March 22, 2015

Comments on IPARTS document for Sydney Waters operating Licence

I was very pleased to note the following, extract from Operating Licence nominating that the role of Sydney water was:

- to exhibit a sense of social responsibility by having regard to the interests of the community in which it operates, and
- ▼ to protect the environment by conducting its operations in compliance with the principles of ecologically sustainable development, and
- ▼ to protect public health by supplying safe drinking water to its customers and other members of the public in compliance with the requirements of any operating licence.¹⁷

In implementing the principal objectives set out above, Sydney Water has the special objectives:

- ▼ to reduce risks to human health, and
- ▼ to prevent the degradation of the environment.¹⁸

The Act provides that the NSW Governor may grant one or more operating licences to enable Sydney Water, in its area of operations, to provide, construct, operate, manage or maintain systems or services for:

- ▼ storing or supplying water, or
- ▼ providing sewerage services, or
- ▼ providing stormwater drainage systems, or
- ▼ disposing of waste water

I totally agree with the role as stated above.

However I was most disappointed to read in the IPART review the following extract relating to the Priority Sewerage Program, stating that although Scotland Island has been identified as a high priority and environmentally sensitive area no planning or construction has commenced and indeed no deadline for the provision of sewerage services has been set. Also there are no requirements in the current licence in regard to planning or construction. The relevant extracts of the IPART review follow:

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4.3 Priority Sewerage Program (PSP)

“The PSP was announced by the NSW Government in 1997 and was a component of the Government’s waterways package to address wastewater and stormwater problems by 2021.⁸⁸ The aim of the PSP is to achieve environmental improvements and reduce human health risks by improving the sewerage management in unsewered areas in Sydney and the Illawarra. The

PSP consisted of 2 stages. Stage 1 included the initial 16 suburbs, towns and villages in areas with high environmental sensitivity. A further 20 unsewered urban village areas were added in the Stage 2 extension of the program in 2001.⁸⁹

4.3.1 Current operating licence obligations and performance

Schedule 4 of the operating licence also includes Nattai and Scotland Island as Stage 2 areas for the PSP. There are no requirements in the current licence with regard to the planning or construction of these areas.

Potential changes to the Priority Sewerage Program obligations

In addition to Yanderra, there are 5 remaining areas: Menangle and Menangle Park (carry over from Stage 1), Austral, Nattai and Scotland Island (Stage 2).⁹⁵ These areas have been identified as high priority/environmentally sensitive, but planning or construction has not commenced. At present, there does not appear to be any deadline for the provision of sewerage services to these areas.

Rather than oblige Sydney Water to sewer PSP areas through its operating licence, it may be more appropriate for the Government to fund these works and services directly as a community service obligation. In doing so, it could seek proposals from the market for the provision of sewerage works and/or services to these areas (this could include private operators licensed under the *Water Industry Competition Act 2006*). In such circumstances, Sydney Water could act as a bidder or a public sector comparator. This would provide a more transparent process and enhance efficiency in the provision of sewerage works and services to these areas.”

In view of the above I am writing this letter to highlight the collective concern of the Scotland Island community at the inability of the government to resolve this very important issue of waste water disposal and the provision of readily available drinking water.

I note in their review where IPART has stated that it may be more appropriate for the Government to fund these works and services directly as a community service obligation. This seems like a good idea as Sydney Water does not seem to have the resources or the inclination to develop cost effective and self -sustaining solutions to these age old problems. Is there any research and development carried out in sewerage disposal and the provision of clean water in Australia?

Should we not be treating this issue as an exciting opportunity to explore new ecological and possibly financially sustainable alternatives? What about solar or wind powered desalination plants? In this age of recycling everything from beer bottles, to chicken poo, surely human waste is a commodity worth exploring. Where is the initiative and imagination that created fantastic engineering marvels like the hydro-electricity scheme?

Are we forever destined to the whims of nature or high energy consuming

desalination plants for our water, and polluting the oceans with our waste?

Regards