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RP053-04

Ms Liz Peterson
Department Infrastructure Planning and Natural Resources
PO BOX 3935
Parramatta
NSW 2124

Dear Liz,

Re: Draft Botany Groundwater Contamination – Inter-agency Communication Protocol

Thankyou for the opportunity to provide comment on the Inter-Agency Communication Protocol for the Botany Bay Aquifer (Groundwater Contamination). The Sydney Coastal Councils Group is currently in the process of conducting a groundwater investigations study across its region in order to produce a Groundwater Management Handbook for its member councils. Both DIPNR and DEC are represented on the SCCG Groundwater Working Group. Copy of the Groundwater Manual Table of Contents is attached.

SCCG welcomes DIPNR pro-active approach in attempting to identify responsibilities to improve communication on groundwater contamination within the Botany Sands Aquifer (BSA). SCCG looks forward to assisting DIPNR in achieving a coordinated regional approach to not only groundwater contamination issues but on a range of groundwater related management issues, particularly those in coastal urban areas.

1. INTRODUCTION

The following feedback is provided on behalf of SCCG. The document triggers many actions (such as implementing Council approvals or notifications) for Council's in the BSA area namely Randwick, Botany and City of Sydney. Some of the actions outlined in this document trigger Council intervention yet the focus appears to be on general activities that are in line with different State Government Departments. The focus for Local Councils does require further attention from DIPNR.

SCCG are committed to assisting its member council's and State Government agencies in the management of natural resources, such as groundwater. The Communication Protocol outlines a number of positive actions that the SCCG Groundwater Water Group would like to adopt within the contents of its Groundwater Management Handbook.

¹ Sydney Coastal Councils Group Inc.

The SCCG consists of 15 Member Councils with sea and harbour frontages in Sydney, including, Botany Bay, Hornsby, Leichhardt, Manly, Mosman, North Sydney, Pittwater, Randwick, Rockdale, Sutherland, Sydney, Warringah, Waverley, Willoughby and Woollahra. Collectively we represent over 1.3 million Sydneysiders. The Group is concerned with the promotion of cooperation and coordination to achieve the sustainable management of the urban coastal environment.

The Group believes that by adopting such measures such as those listed below, they will greatly assist its member councils in achieving a more consistent approach and development of, best practice management for Groundwater management. The Group envisages that we will adopt or include where necessary into the SCCG Groundwater Management Manual the following items:

1. An adaptation of the Inter-Agency Communication Flowchart;
2. The inclusion of the Groundwater Management Categories Map; and
3. The development of a comprehensive reference list

Given this is an inter-agency communication protocol and Waterways Authority are a consent authority and ARA within the Botany Region, it is suggested that they be included as a part of this inter-agency protocol.

2.0 OTHER CONSIDERATIONS

Figure 1 - Location Map of the Botany Sands Aquifer, northern zone:

This map should provide a clearer indication of contamination boundaries, and include other physical data such as major landmarks and major roads. SCCG has entered into a groundwater data licence sharing agreement with DIPNR and has provided to its member councils GIS layers to assist with other forms of communications with the community. The data supplied by DIPNR shows bore hole locations within each SCCG member council Local Government Area and has attached attribute data on the bore hole including depth of bore, soil type, etc.

Figure 2 - Inter-Agency Communication Response Flowchart:

Under Step 3 - it is outlined that DEC will be responsible for determining potential or actual contamination. SCCG have identified through a recent member council survey, that Council's lack the necessary resources and skills to deal with contamination issues. It is imperative that both DEC and DIPNR provide adequate assistance to Council's to deal with contamination related inquiries. It is also essential that any proposed assistance measures be sufficiently outlined in the communication protocol.

Under Step 4 - SCCG would also like to point out that the proposed SCCG Groundwater Management Manual will also provide both DEC and DIPNR with the opportunity to provide material on contamination management for not only the Botany Aquifer region, but for the entire SCCG region. It is proposed that the manual would direct (via flow diagram) people to the most appropriate procedures to take when dealing with contamination.

Item 4.1 – Step 2

If Council's are notified of a pollution complaint from DEC, they are directed/expected to follow up the complaint. SCCG believes the following points will need further attention:

- Exactly how should Council's follow up complaints?
- Is Council staff expected to carry out field inspections?
- Does Council staff need to record the information on a GIS database (perhaps this should be an option for Councils?)
- How do DIPNR and DEC propose to provide Councils with resources to do this?
- Are these issues the Groundwater Management Handbook should be addressing?

Item 4.2 – Step 4

What type of historical information needs to be supplied by Councils? This is not clearly defined. Does it include a comprehensive historical air photo interpretation, a description of spatial and temporal land use change over time and any potential or actual affects to the aquifer? The document needs to be more specific on this.

Item 4 -Communication Strategies

SCCG welcomes the communication strategies put forward by DIPNR. The only concern is that will DIPNR have enough resources to undertake such strategies as door knock and letter drop and will they rely on Council's to assist with this?

Item 4.5 – Contaminated Groundwater Register

SCCG encourages the conception of a contaminated groundwater register for the BSA. The SCCG Groundwater Working Group would also like to adopt the database/contamination incident report framework outlined in section 4.5 and Appendix 2 and Appendix 4 within the proposed SCCG Groundwater Management handbook. Given each SCCG member council now has a digital copy of Groundwater Data, recording and updating contamination information will be more manageable for Councils and will assist both DIPNR and DEC in groundwater contamination management.

Appendix 3 - Recommended Analytical Suite for Groundwater Quality Testing

SCCG welcomes DIPNR's efforts to provide direction with respect to the recommended minimum analytical suite for groundwater. SCCG would like to request from DIPNR that SCCG will adopt within the proposed Groundwater Manual so as to promote awareness and go towards achieving consistency in analytical assessment across 15 Councils.

CONCLUSION

Sydney Coastal Councils Group once again applauds the initiative taken by DIPNR to adopt an inter-agency protocol and looks forward to assisting DIPNR implementing the protocol when it is finalised. I trust the above comments and suggestions will be given consideration in the next phase of the communication protocol.

If you wish to clarify any matter in outlined within this submission or require further information, please contact Richard Phillips, Coastal Projects Officer on (02) 9399 0675 or email richard@sydneycoastalcouncils.com.au

Yours sincerely,

Richard Phillips
Coastal Projects Officer