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23 August 2004

GW048-04

Ms Kaye Power  
Chairperson  
NSW Recycled Water Working Group  
NSW Health  
PO Box 798  
GLADESVILLE NSW 1675

Dear Ms Power,

**Re: Submission on NSW Recycled Water Working Group – Interim Advice**

Thank you for inviting the Sydney Coastal Councils Group Inc. (SCCG) to make a submission to the NSW Recycled Water Working Group regarding the *NSW Recycled Water Working Group – Interim Advice*. **Information on the SCCG and its activities is provided in Attachment 1.**

The SCCG provides the following submission in an effort to highlight key issues of concern and those needing further consideration. In addition to the comments provided below, specific comments have been made by our member councils in submissions to NSW Health which the SCCG supports, however, these will not be covered specifically in this submission.

**1. INTRODUCTION**

The SCCG congratulates the NSW Government on establishing the NSW Recycled Water Working Group in 2003 to review the management framework for recycled water.

The SCCG considers the interim advice document to be an encouraging start to identifying issues to be addressed to ensure sustainable outcomes. The SCCG is however a little unclear who is the target audience for the document and why there is such limited management advice or discussion regarding the capture and use of recycled water. The SCCG strongly encourages the Government to now *urgently* move forward to start providing Local Government (including development assessment, approvals, management and inspection staff) and the community with the necessary advice, policies, relevant technical information, implementation tools and resources to better manage and ensure sustainable utilisation of recycled water across the State. The needs to address the current limitations in available potable water and the fact that the State Government has a moratorium on the provision of a new dam, the SCCG is very supportive of Government initiatives to encourage sustainable alternative water sources for domestic, commercial and industrial applications.

While the document adequately identifies the main issues to be addressed it is concerning that the document has missed an opportunity to identify existing and proposed implementation frameworks policies, practices, mechanisms and demonstrations to ensure the timely take up for the appropriate collection and use of recycled waters. There are also requirements to undertake appropriate research into system designs to satisfy health requirements and to address any potential cross contamination issues of surface and groundwaters.

The SCCG is also surprised to see no reference to the imminent Sydney's Water Strategy being developed nor any reference nor acknowledgement of the potential Federal Government role in this issue through established programs such as the National Water Initiative.

The SCCG suggests that any advice document for recycled waters should provide:

- Government statement / objectives on water utilisation that includes recycled water supplies,
- Strategic visions for use of recycled water in NSW,
- Government responsibilities (at all levels),
- Legislation and NSW Government policy,
- Planning and development guidelines and provisions,
- Technical drawings and diagrams,
- Performance indicators and targets,
- Reference materials and guidelines,
- Recycled water uses including quality and quantity assessments and their limitations,
- Biophysical considerations (soils, irrigation, neighbourhood issues and limitations),
- Reference materials and contacts,
- Recycled water systems:
  - Approved systems (including all details),
  - Performance expectations (including limitations),
  - Inspection criteria, methods, reporting (for the appliance and environment - targeted at Local Government and property owners / body corporates),
  - Potential for device modifications (site / development specific issues),
  - Use and potential accreditation of non approved or modified systems.

## 2. Specific Comments

The key recommendations and actions for NSW Government are to:

1. Develop a clear and balanced regulatory and management framework for recycled water, with initial priority given to on-site wastewater recycling for multi-unit dwellings. The Recycled Water Working Group should oversee this process, and be adequately resourced for this task.
2. Review the current funding structure for alternative water systems to achieve appropriate regulation of monitoring and maintenance.
3. Communicate clearly to the community, the risks, benefits and requirements for installing and using alternative and recycled water systems.
4. Provide clear guidance on final uses of various alternative and recycled water sources, based on required water quality.
5. Establish a funded capacity-building program for State and local government for all forms of recycled water, and initially target Sydney metropolitan area.
6. Continue to contribute to the National Guideline development process to ensure timely development of material that meets NSW needs.

The SCCG strongly supports the above recommendations and provides the following comments:

1. The SCCG supports the need for a clear and balanced framework. The SCCG considers it also important to focus attention on the rapidly emerging application of grey water reuse systems for single dwellings as a result of the implementation of BASIX, the current drought conditions and the increasing community understanding and appreciation of the values of water for the environment and to reduce water rates.
3. Communication is required all levels of the community including the industrial sector. The current focus on domestic applications should acknowledge that the private sector has a significant opportunity to encourage market take up and significantly advance the technology for these systems and their end uses.
5. The SCCG strongly supports this recommendation and has the ability to assist the Government with this process through our well established networks within our member councils and further beyond in the Sydney region. It is concerning that proven extension

programs such as the NSW Stormwater Trust, Stormwater Extension Officer program (concluded August 2004) could have been well placed to evolve to more broadly consider water cycle management issues including application of recycled waters.

- **Rainwater Collection and Storage Systems**

#### **Recommendations**

1. Provide guidance for councils and proponents on requirements for regulation and operation of rainwater collection and storage systems.
2. Councils or water utilities should establish and maintain a register of systems installed with a mains water connection or plumbed into a dwelling.
3. Investigate the adequacy of information transfer for rainwater systems at property sale or change of tenants.

The SCCG supports the above recommendations and the SCCG again encourages the Government to urgently provide the necessary implementation tools and resources to achieve these objectives.

2. It is suggested that cost recovery mechanisms for installation and maintenance inspections be developed to assist Local Government maintain and manage the necessary registers for recycled systems,
3. The Government is encouraged to work with industry and Local Government to develop a standardised set of information at the point of sale for all approved recycled water systems.

- **Grey water - Single Dwellings**

#### **Recommendations**

1. Develop a communication strategy to inform residents of the risks and benefits of using grey water and how to use it safely.
2. Review the adequacy of accreditation and need for point-of-sale controls on grey water diversion devices.
3. If accreditation or controls on devices are inadequate, then consider amending the legislation to require council approval of grey water diversion devices.
4. Review the need for accreditation or licensing of service technicians for grey water treatment systems.
5. Establish a funded capacity-building program (similar to SepticSafe) focussed on all forms of recycled water, and initially target Sydney metropolitan councils. The information developed should be transferable to non-metropolitan councils when BASIX commences in regional NSW on 1 July 2005. The program will require staff resources and the production of guidance and communication devices to support councils.
6. Complete the review of the Environment & Health Protection Guidelines and review the NSW Health Advisory Note.

The SCCG supports the above recommendations. The SCCG encourages the Department of Health to provide advice on the application of grey waters. It is important that specific advice is provided to local government and the development sector on issues for example relating to local soil biophysical conditions. This is to ensure that applications do not enhance residual salt concentrations and subsequent surface exposures, and have no impact on neighbouring properties or turn up as nuisance waters nearby. Some site studies should be required by proponents for areas potentially effected by these limiting conditions and where areas have restricted permeability.

- **Wastewater – Single Dwellings**

#### **Recommendations**

1. Provide ongoing support to local government to encourage the completion and full implementation of their sewage management strategies.

2. Complete the review of the Environment & Health Protection Guidelines.

The SCCG supports the above objectives and agrees that focus should be recycled rainwater, stormwater water, and grey water applications.

- **Grey water and wastewater - multi-unit dwellings and commercial buildings**

#### Recommendations

- Develop a clear legislative framework for the installation and maintenance of grey water and wastewater treatment and recycling systems for multi-unit dwellings and commercial premises.
- Treat initial applications as pilot projects developed in partnership between proponents, State government agencies and local councils.

The SCCG supports the above objectives and encourages the Government to also address applications in industrial areas. Industry is well placed to advance technology and also potentially utilise grey water resources from various single and multi storey developments from adjacent residential and commercial areas.

- **Centralised Wastewater Systems**

#### Recommendations

- Provide guidance to improve consistency of assessment and implementation of centralised wastewater management schemes, particularly urban irrigation and smaller schemes.
- Review monitoring requirements for centralised residential wastewater recycling schemes with a focus on risk management and cost efficiency.
- Use results and information from existing centralised wastewater recycling schemes to improve assessment and conditions for proposed schemes and review conditions for existing schemes.

The SCCG supports the above objectives and encourages the Government to consider industrial and large scale irrigation applications when dealing with centralised waste water systems. Industry is well placed to advance technology and also potential utilise significant grey water resources from nearby residential, commercial and industrial areas.

- **Stormwater**

#### Recommendations

- Develop clear guidance on approvals and standards applicable to stormwater recycling systems.
- Treat initial applications as pilot projects developed in partnership between proponents, State Government agencies and local councils

The SCCG supports the above objectives and encourages the Department of Health to work actively with DEC and Local Government to ensure sufficient consideration of the variability in stormwater quality and the resultant potential end uses.

The SCCG also considers the statement "Treat initial applications as pilot projects developed in partnership between proponents ..." to be overly vague. If the Development Applications are going to Local Government how can the State Government be party to "an initial application" unless they are considered 'integrated development'. The SCCG also questions how many pilot projects will be developed over the course of the next year or three.

What council officers need is clear guidance on available "Health Department accredited" grey water treatment systems, their performance and their treatment methods, and potential pitfalls.

### **3. CONCLUSION**

I trust that these comments and recommendations will receive appropriate attention when establishing the implementation process and the necessary technical and management guidance resources required by Local Government to ensure efficient and sustainable application of these technologies to better capture and recycle waters.

If you wish to clarify any matter in the submission or require further information, please contact the me directly on 9398 7537

Yours sincerely,

Geoff Withycombe  
**Executive Office**

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