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### **Re: National Guidelines for Water Recycling**

The Sydney Coastal Councils Group (SCCG) would like to take this opportunity to provide comment on the National Guidelines for Water Recycling. The SCCG supports a preventative risk management approach and congratulates the Natural Resource Management Ministerial Council (NRMMC) on preparing the draft Guidelines.

Meaningful application of the guidelines will require ongoing guidance from the NRMMC and commitment from all relevant stakeholders. It is strongly recommended that the NRMMC play a role in;

- Advocating the adoption and promotion of the Guidelines to all stakeholders, particularly State and Territory Governments; and
- Identifying opportunities to build the capacity of all stakeholders to implement the guidelines, particularly Local Government, Industry and the Community.

In making this submission the SCCG focuses on the useability of the Guidelines for Local Government. Addressing the following aspects of the guidelines:

1. Implementing the Framework
2. Monitoring
3. Consultation and Communication

#### **1. Implementing the Framework**

The water recycling management framework provides a useful template and technical tool for developing preventative risk management systems. To support its implementation the following actions are required:

- A commitment from all stakeholders to undertake the actions outlined within the framework;
- Development of supporting policy and regulation for the guidelines; and
- The provision of ongoing assistance (technical advice, monitoring tools) from the NRMMC and relevant Government agencies to support stakeholder implementation and understanding.

#### **A commitment from all stakeholders to undertake the actions outlined within the framework**

Without a commitment from all stakeholders to undertake the actions outlined within the framework the guidelines risk being implemented in a piecemeal manner or not at all. In consultation with all stakeholders, the NRMMC must take the lead in identifying the stakeholders responsible for actions and opportunities for more formal coordination outlined in

the framework. Identification of stakeholder roles and opportunities for cooperation between regulatory authorities at National, State and Local levels will assist coordinated and consistent implementation of the Guidelines.

### **Development of supporting policy and regulation**

Consistent application of the framework will only be achieved if the principles of the guidelines are underpinned by the appropriate State and Territory policy and regulation. Through its Ministerial representatives it is strongly recommended that the NRMMC advocate the adoption of the Guidelines by each State and Territory Governments.

Supporting policy and regulation will provide Local Government, Industry and the Community with the certainty and legislative support to proceed with applying the Guidelines. Development of policy and regulation based on National Guidelines would also assist in reducing the large number of inconsistent policies and legislation that exist amongst States on this issue.

### **The provision of ongoing assistance from the NRMMC and relevant Government agencies to support stakeholder implementation and understanding**

Across the Greater Sydney Metropolitan Region the technical expertise and available resources (time, staff, budget) of Councils to identify and mitigate any negative impacts of proposed water recycling is highly variable. Additionally, Industry and Community understanding is limited. SCCG recommends the following opportunities for Local Government, Industry and Community support be developed to assist local and regional implementation of the guidelines.

- **Funding opportunities**

SCCG recommends the NRMMC investigate opportunities for funding and grant programs that promote and assist the implementation of the Guidelines. A number of National and State-wide grant programs exist to promote and support water savings actions and outcomes. The development of a similar program for the Guidelines would promote the application and coordination amongst stakeholders and enable trials of compliant systems and build a resource and information base.

- **Supporting resources**

Assistance in the form of supporting resources including software packages and “how to” fact sheets on the Guidelines, Frequently Asked Questions, Case Studies are strongly recommended. A communication network of practitioners to discuss issues as they arise would significantly benefit all stakeholders. The development of the final Guidelines and a supporting resource package would greatly assist Local Government apply the guidelines and communicate the principles and desired outcomes of the Guidelines to Industry the Community.

- **Ongoing validation process for new technology**

The validation and monitoring of new recycling technologies will be an ongoing issue for all consent and regulatory authorities. SCCG recommends that as part of the release of the final guidelines a database of certified technologies be developed and maintained.

Local Government does not have the resources to be constantly verifying the claims of new water recycling technologies and has concerns with the potential liability of approving recycling systems that are untested. This may significantly limit innovation and implementation.

Supporting information on how to assess performance claims and ongoing performance monitoring are also required (who, what, when) and would greatly assist Local Government. Development of feedback loops and expanded peer review would also help populate a data base of existing technologies and applications over time for national use and application.

## **2. Monitoring**

Coordinated and consistent monitoring of water recycling systems is required to ensure environmental and health risks are minimised and Industry and Community support for monitoring is maintained. Effective monitoring through application of the Guidelines requires:

- Identification of processes for coordinated monitoring, reporting and auditing of information and certifying information added to the database; and
- A central data base containing all recoded information.

### **Identification of responsibilities for coordinated monitoring, reporting and auditing of information and certifying information added to the database**

The processes for monitoring water recycling systems at Community, Industry and Local, State and Federal Government scales must be defined by the NRMMC in consultation with the relevant stakeholders.

The responsibility for system management and monitoring belongs with the owners of the recycling system. However, coordinated processes for reporting and auditing need to be undertaken at a Local Government, Regional or State scales to verify results and auditing as well as assess cumulative impacts that can not be assessed through single on-site monitoring. It is recommended that NRMMC assist State and Local Governments in identifying and developing the process or mechanisms for implementing the monitoring, reporting and auditing strategies outlined in the Guidelines.

### **A central data base containing all recoded information**

It is recommended that in finalising the Guidelines the NRMMC consider opportunities (conferences, discussion forums, a one stop shop) for sharing and management of recorded information at regional, state and national scales. This will assist the assessment of cumulative impacts and provide stakeholders with access to information about the application of water recycling systems in areas with varying environmental characteristics.

### **3. Consultation and Communication**

The Consultation and Communication components of the Guidelines provide a useful tool in developing and implementing communication strategies for Local Government. In finalising the Guidelines an ongoing process for the review and updating of the Guidelines should be established. The provision of new information or case studies are likely to be necessary in the future.

### **In conclusion**

SCCG congratulates the NRMMC on the development of the guidelines. I trust that the information provided in this submission will receive appropriate attention when finalising and assessing the National Water Recycling Guidelines. If you wish to clarify any matter in the submission or require further information, please contact Craig Morrison (Coastal Projects Officer) on 9246 7702 or [craig@sydneycoastalcouncils.com.au](mailto:craig@sydneycoastalcouncils.com.au)

Yours sincerely,

As signed

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**Executive Officer**