

April 3, 2015



Review of the Operating Licence for Sydney Water Corporation  
Independent Pricing and Regulatory Tribunal  
PO Box Q290  
QVB Post Office 1230

Dear Sir/Madam,

**Re: Scotland Island Wastewater Priority Sewerage Program (PSP) and Sydney Water Operating Licence**

We wish to thank IPART for the opportunity to address the panel on March 30, 2015 in relation to the Priority Sewerage Program. We take this opportunity to review and provide some further necessary details upon the points made.

As noted in our brief presentation, we thank IPART for retaining the Priority Sewerage Program in the draft report.

**Previous undertakings, commitments and promises made:** This issue has a long history with the local community being led to believe over many years that the installation of a sewerage system was promised and imminent. For example in January 2011, just prior to becoming the Premier of NSW [Barry O'Farrell wrote \(link\)](#): *"The NSW Liberals and Nationals will fast-track the connection of sewerage ... clearing most of the Keneally Labor Government's Priority Sewerage Program backlog,... We will also ensure remaining areas such as Austral, West Hoxton, Menangle, Menangle Park, Nattai and **Scotland Island** are connected to the sewer as a matter of priority..."*

In December 2012, the NSW Government's [Northern Beaches Regional Action Plan \(link\)](#) made a clear commitment to *"Better manage waste water and improve ocean water quality including upgrades to waste water and sewerage treatment facilities for **Scotland Island**"*, (page 13). And also *"The provision of wastewater services to **Scotland Island** is a matter of priority ..."* (page 14).

**Environmental Effects:**

Scotland Island represents the largest tract of the Pittwater Spotted Gum Endangered Ecological Community (EEC), listed under the Threatened Species Act (TSA). A dense residential subdivision, steep incline and impermeable clay based soil profile of Hawkesbury Sandstone and Narrabeen Shales render current onsite disposal systems a Key Threatening Process (KTP) under the Act. Nutrient rich ground water containing effluent from disposal fields in non-absorbent clay bed contributes to significant die back of the unique values of the environment. In addition, nutrient laden runoff impacts surrounding estuarine sea grass beds, fish nurseries and the invasion of *Caulerpa taxifolia* (declared a Noxious Aquatic Species).

**Health Effects:** The Martens and Associates study, [Australian On-site Waste Water Strategies: A case study of Scotland Island](#) conducted in 1996-97, reported that storm water run-off on the Island is contaminated with both nutrients and bacteria, indicating severe sewage run-off pollution. Bacterial levels are extremely high, significantly exceeding ANZECC guidelines for surface water and in the salt water estuaries.

- [Faecal Coliform levels](#) were measured at levels between 96,850 to 58,475 Colony Forming Units per 100 mL. The recommended ANZECC safety level being a maximum of 150 Units per 100 mL. That is **up to 645 times above the recommended safety level.**
- Even more concerning was that [Enterococci levels](#) (that can lead to urinary tract infections, bacteremia, endocarditis, diverticulitis, and meningitis) were measured at levels between 91,207 to 51,869 organisms per 100 mL. The recommended safe level being a maximum of 35 Organisms per 100 mL. That is, up to **2,600 times above the ANZECC safety level.**

**Cost:** While we acknowledge that the planning and installation of sewerage systems has been part of Sydney Water's business, we question the cost estimate of \$82,000,000 proposed by Sydney Water for this project. We hope that more detailed planning will clarify this costing.

**Who Pays:** The Scotland Island Community is prepared to contribute to this project to the same extent as all other previous recipients of the Priority Sewerage Program. Specifically, to the cost of any necessary upgrade to domestic plumbing systems, the connection from the house to the mains system and the removal of redundant domestic septic systems. The community is neither prepared nor able to contribute to the capital cost of this project. We have no view as to whether this project should be funded directly by Sydney Water or by the NSW Government.

**Timing:** Most importantly our concern is that there is no timeline for this project. The requirement to report annually on the planning of this project provides no certainty that any plan will be implemented. Our strong view is that this project be undertaken within the five year period of the current licence.

We again thank IPART for an opportunity to further elaborate upon our verbal submission and we hope that the outcome will be a positive step in the resolution of this long standing issue.

Yours truly,

A handwritten signature in blue ink, appearing to read 'W.R. Gye'.

Bill Gye OAM  
President  
SIRA

cc: Niall Bair, MLC; Rob Stokes, MP