

INQUIRY INTO A SUSTAINABLE WATER SUPPLY FOR SYDNEY

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Subject:

Summary



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GENERAL PURPOSE
STANDING COMMITTEE

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Standing Committee No. 5
Inquiry into a sustainable water supply for Sydney
Parliament House
Macquarie Street
SYDNEY NSW 2001

Dear Sir/ Madam

Submission - Inquiry into a sustainable water supply for Sydney

Thank you for the opportunity to make a submission on ensuring a sustainable water supply for Sydney. Please find to follow a general submission on behalf of Randwick City Council which objects to a desalinisation plant being considered as the major solution Sydney's water supply and urges the State Government to investigate and implement a comprehensive range of measures to address water supply across Sydney, including a greater emphasis on water recycling, reuse and use minimisation. A desalinisation plant should only be considered as a last resort, should the other measures still require supplementation.

The need

Council acknowledges the need for the development and successful implementation of a sustainable water strategy for Sydney and the progressive work that government at all levels, industry and community have initiated, particularly in the areas of water recycling and rainwater harvesting. Considering that Sydney receives twice as much rainfall as Melbourne per year and only 3% of the water that we use in Sydney is recycled the potential to utilise this water resources is immense. The option of desalination should

only be considered once demand management and recycling opportunities have been exhausted.

Randwick City Council's position regarding desalination

In May 2005 Council resolved to oppose any proposal for a desalination plant on Malabar Headland. In July 2005 following the Government's announcement of a site Council resolved to oppose the construction of a desalination plant on Kurnell peninsula. That resolution also went on to oppose any such plant anywhere in Randwick City. Letters regarding both resolutions were sent to the Premier and Planning Minister Frank Sartor. In addition the letters outlined Council's concern for the potential negative impacts the plant may have on the marine ecology of Botany Bay and the Pacific Ocean, and in particular the coastline and beaches of Randwick City south and central wards. The letters also called on the Premier to immediately undertake a feasibility study on sewerage and stormwater re-use.

In August Council received a reply from Minister Sartor stating that the Premier had announced "that on the basis of engineering, environmental, social and commercial considerations, land in the industrial area of Kurnell is the most suitable location of a desalination plant to be built, if the drought continues".

Alternatives

Council notes that the construction of the desalination plant has been declared a 'critical infrastructure project' under section 75C of the NSW Environmental Planning & Assessment Act 1979 and as such the Government may fast track its construction. Consequently the assessment process is not required to look at alternatives; rather it concentrates on the construction and operation of the facility and the mitigation of potential impacts. Determinations under this part of the Act have no appeal rights or recourse to independent commissioners and do not require an Environmental Impact Statement (EIS).

It is disappointing that the debate on a sustainable water strategy for Sydney is restricted and no other sustainable alternatives are considered due to the declaration of this proposal as "critical infrastructure". The declaration also limits the scope of this proposal, which, given the legislative process, narrows of the assessment and community consultation process. It is regrettable that the detailed investigation of alternatives by Government, previously called for by Council and many other organisations, has either not occurred or not been made available and is not required by this assessment process. Council again calls for thorough and open investigation and comparison of alternatives.

Government policy

In 2003 the NSW Government's urban water policy *Changing the Way We Think About Water* reaffirmed the commitment not to build any new dams and required Sydney Water, amongst other actions, to continue to invest in demand management and other opportunities such as recycle treated wastewater. It is therefore disappointing to note that large scale recycling by Government is to be limited to land release areas in Western Sydney. Also that private sector negotiations with Sydney Water to access the 400 billion

litres of waste water pumped out from Sydney's ocean outfalls annually have required an appeal to the Australian Competition Tribunal to endorse a recommendation by the National Competition Council.

In 2004 government released *Meeting the challenges – securing Sydney's water future*, which outlined the plan for Sydney's water supply for the next 25 years. The plan states, "The Government has accepted international scientific opinion regarding the impacts of global warming is already having on NSW," and acknowledges the need for changes to secure our future water supply.

NSW Government has been commended for its NSW Greenhouse Strategy, established a Greenhouse Office and has called for the ratification of the Kyoto Protocol. However the scale of the problem requires further and stronger action by the NSW Government. In this regard the Government is urged to lead by example and, as part of a comprehensive strategy, further investigate projects with an emphasis on recycling, reuse and use minimisation.

Energy and greenhouse gas emissions

Should the desalination project proceed the greenhouse gas emissions from the plant will be a major and ongoing impact. The commitment given in the environmental assessment by Sydney Water is to reduce these emissions by 50%.

The notion of green offsets was introduced by the EPA following the NSW Government's release of its 2001 Environmental Statement, *Action for the Environment*, which highlighted the need to apply new mechanisms to address the cumulative environmental impacts of development.

Theoretically, a green offset scheme ensures that there is a net environmental improvement as a result of development. Any additional environmental impact generated by a development is offset by action taken off-site that reduces a greater amount of environmental impact, so that the net effect of development is positive.

The EPA's Principles of offsets:

- Environmental impacts must be avoided first by using all cost-effective prevention and mitigation measures on-site. Offsets are then only used to address remaining loads of pollutants.
- All standard regulatory requirements must still be met.
- Offsets must never reward ongoing poor environmental performance.
- Offsets will complement other government programs.
- Offsets must result in no net increase of target pollutants.

Offsets must be:

- Enduring – they must offset the impact of the development for the period that the impact occurs.
- Quantifiable – the impacts and benefits must be reliably estimated.

- Targeted – they must offset the impacts on a 'like for like' basis, e.g. a measure that reduces nitrogen must be used to offset nitrogen.
- Located appropriately – they must offset the impact in the same area.
- Supplementary – they must be beyond existing requirements and not already being funded under another scheme.
- Enforceable - they must be enforceable through development consent conditions, licence conditions, covenants or a contract.

The EPA provides the above advice regarding offsets. Therefore should the proposal proceed its greenhouse gas reduction strategy must clearly demonstrate how the EPA's advice and the theory behind offsets have been met.

Public interest

Whilst confusion about water reuse exists in the Sydney community, it has been proven across the world that the risk of infection from drinking recycled water is significantly lower than the acceptable risk of drinking normal potable water.

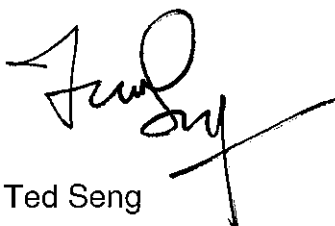
There is overwhelming public opinion against desalination across Sydney. It has also been suggested that desalination discourages sustainable water practices at home and with industry as it is viewed as an unlimited water resource. Consequently with viable and more sustainable alternatives available to Government, in forms including water recycling and rainwater harvesting, Council advocates that these alternatives should be pursued, with desalination being a last resort rather than the principal solution.

Conclusion

Currently close to 400 billion litres of waste water is pumped into the ocean off Sydney, of which 72% of this waste water receives primary treatment only. Sydney's projected shortfall of water within the next 25 years is 200 billion litres. The opportunity for Government to achieve a more positive environmental outcome by utilising this wastewater and upgrading sewerage treatment in a more integrated water management system should be realised. This, in addition to greater emphasis on a comprehensive range of re-use, recycling and use minimisation measures, would achieve a far more positive outcome for future generations than a desalination plant.

Thank you once again for the opportunity to comment, should you require any further information regarding this submission please contact Karen Armstrong, Manager - Strategic Planning on 02 9399 0992.

Yours sincerely,



Ted Seng
MAYOR