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By email

10 November 2011

Subject: Brooklyn Wastewater Treatment Plant – Modification to Condition 63

The Hawkesbury Nepean Catchment Management Authority (HNCMA) has briefly reviewed documentation associated with the proposed modification to Condition of Approval 63 (CoA 63).

The Assessment Report indicates that Sydney Water is proposing modifications to the effluent quality limits in CoA 63 to increase the set limits for total phosphorus, total nitrogen and ammonia.

The HNCMA recognises the social and economic importance of recreational and commercial industries and activities in the Hawkesbury estuary, which are reliant on water quality. It also recognises the unique environmental values of the Hawkesbury estuary. As such the HNCMA believes that all possible efforts should be made to reduce excess nutrient input into the river system.

The HNCMA supports the recommendations of the Lower Hawkesbury-Nepean River Nutrient Management Strategy (State of NSW and DECCW 2010). One of the strategic priorities of the Strategy is to "continue to reduce nutrient loads through cost effective technology at STPs". This proposal does not align with the preference for continued improvement in the implementation of wastewater treatment practices.

The HNCMA has been undertaking actions to reduce nutrient and pollutant loads in the catchment, including extensive levels of investment in such programs as the recent Hawkesbury Nepean River Recovery Nutrient Smart Farms Project aimed at improving water quality in the Hawkesbury Nepean River System. The environmental benefits of works to reduce nutrient loads, could be undermined by an increase in pollution loads from the STP. This may result in a perverse outcome to the river and industries that depend on it.

The cumulative impact of nutrients entering the river is a key consideration. Management of nutrient from a point source is usually more cost effective than the management of the many diffuse entry points.

The HNCMA is also aware that this is an issue of community concern in the estuary and has been approached by members of the community about this proposal. We have directed these people to contact Sydney Water and trust that their submissions will be given consideration.

Thank you for the opportunity to comment.

Yours sincerely

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General Manager

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