

Ms Kim Johnston
Industry, Social Projects and Key Sites
NSW Department of Planning and Infrastructure
GPO Box 39
SYDNEY NSW 2001

28 February 2014

Dear Ms Johnston

Re: West Culburra Mixed Use Concept Plan (MP 09_088) – Comment on Response to the Submissions Report

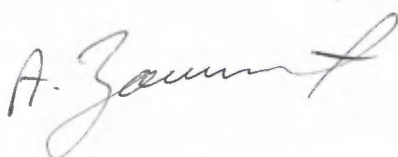
I refer to your letter dated 10 December 2013 to the NSW Food Authority regarding the above matter. The Food Authority provides the following comments on the proposal.

1. The proposed development lies adjacent to the Curleys Bay shellfish harvest area, the Crookhaven River shellfish harvest area and the Goodnight Island shellfish harvest area. These harvest areas represent 60% of the active shellfish harvest areas in the Shoalhaven/Crookhaven Rivers estuarine system. The protection of water quality within shellfish harvest areas is critical to the protection of public health and the on-going viability of the local oyster industry.
2. Management plans for the adjacent oyster harvest areas stipulate that they will close following 40mm in 48 hours for Curleys Bay and Crookhaven River harvest areas and 50mm in 48 hours for Goodnight Island.
3. It is noted that the design of stormwater treatment and inception devices aim to provide at least 72 hours retention time to reduce the level of faecal contamination entering the estuary. The design of the stormwater system should ensure that this holds true for rainfall events up to 49mm in 24 hours to preserve the integrity of the current harvest area management plans.
4. The most significant food safety risk posed by urban developments to shellfish harvest areas is related to sewage management.
 - a. Given the high risk location adjacent to three shellfish harvest areas and the small lot size the area appears unsuitable for on-site sewage management. No on-site sewage management systems are currently included in the proposal.
 - b. Sewage may be released during recreational activities such as boating, camping or walking. This risk can be reduced through the provision of suitable public toilet facilities. The provision of public toilet facilities to serve key recreational areas such as parks, BBQ areas, jetties and walking tracks should be included in the sewage management plan for the development.

5. Sewage management in the development phase should also be considered to ensure that adequate ablution facilities are provided to site workers.
6. We also note that colleagues from Fisheries NSW have raised a range of water quality related issues.

For further information please do not hesitate to contact me on (02) 9741 4848 or at NSWSP@foodauthority.nsw.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. Zammit', with a stylized flourish at the end.

Anthony Zammit
Manager, NSW Shellfish Program