

Supplementary Key Issues

Project Development and Alternatives

Section 4.3 of the Environmental Impact Statement (EIS) details the Merimbula Effluent Options Investigation (MEOI) (AECOM, 2013) that identified and assessed options for effluent disposal and re-use at the current Merimbula Sewage Treatment Plant. The study outlined a preferred strategy which Bega Valley Shire Council (BVSC) adopted for the Merimbula Sewage Treatment Plant Upgrade and Ocean Outfall (the Proposal). The MEOI project was undertaken from 2009-2013 and investigated 8 re-use and 3 disposal options.

The Department request that the Submissions Report clarifies what work has been undertaken since the MEOI report to support the current Proposal, including but not limited to:

- Comparative costs associated with wastewater treatment, installation of a secondary disposal mechanism, and infrastructure associated with the beneficial re-use of wastewater for farming, irrigation, and other uses.
- The Proposal's role within BVSC's wastewater strategy and effluent management.
- Consideration of the Proposal's role in mitigating the impacts of drought and climate change.
- Financial, geographic, and environmental opportunities and constraints for the re-use of treated effluent in Bega Valley.
- Future opportunities for the beneficial re-use treated wastewater and how it will be determined.
- How the Proposal's meets the strategic aims of the *Draft NSW Water Strategy*, (DPIE, 2021) and *Draft South Coast Regional Water Strategy*, (DPIE, 2020).

Aboriginal Heritage

The Submissions Report must clarify the depth in which directional drilling will occur for the ocean outfall pipeline in the dune ridges as there is an inconsistency between the depths reported in the EIS and the Aboriginal Cultural Heritage Assessment Report (ACHAR).

Section 2.2.1 of the EIS states that 'the terrestrial component of the outfall pipeline would be laid between -9.3 m and -19.5 m AHD', whereas section 9.3 of the ACHAR notes the upper limit of drilling depths within dune ridges and the back barrier sand flat will be approximately 2m to 7.5m.

As the ACHAR notes that Aboriginal burial sites have previously been recorded within the project area at a depth of 2m – 3m below the original ground surface (ACHAR, Table 11) and that the Merimbula Barrier sand mass have been identified as having high archaeological potential clarify this inconsistency.

Aboriginal Cultural Heritage Advice

The Submissions Report must revise Section 8.4 of the ACHAR to incorporate Registered Aboriginal Party (RAP) feedback which identified the revised project area as having high cultural significance in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH, 2011). Cultural values should then be

considered in conjunction with scientific values to develop a comprehensive assessment of values and significance. This includes areas where the project area has increased along the beach face and golf course after the archaeological survey and test excavations took place.

Update AHIMS data

Please clarify and update the following AHIMS data in the EIS/ ACHAR:

- Update the validity of site 62-6-0133 because the site was salvaged in 1979.
- Correct the GPS coordinates of sites 62-6-0173 and 62-6-0475 through the submission of new site cards.
- Update the polygon boundary for site 62-6-0809 via a new site card to include the approximate area of additional burials reported by Graham Moore. The updated boundary should be used on all project mapping.

Tertiary Treatment and Water Quality

The EIS has flagged tertiary treatment of wastewater as a potential option that will be assessed in greater detail during the detailed design phase of the Proposal. The Submissions Report must outline the benefits of tertiary treatment and quantify the annual volumes of aluminium and other bioaccumulating elements to be discharged over the lifespan of the ocean outfall with, and without tertiary treatment. This information would determine the potential long-term benefits to water quality which may support the case for the implementation of tertiary treatment as part of the Proposal.

Water Monitoring

The Submissions Report must clarify if periodic operational water quality monitoring (to coincide with releases) will continue after two years following completion of the Proposal.

Water Take

The Submissions Report must provide a quantified prediction (using analytical methodology) of any potential groundwater take related to the Proposal, from the 'intermediate drilling site' or otherwise. It should outline predicted drawdown impacts and the location of any proposed dewatering, in relation to the marine waters' groundwater demarcation, in a conceptual model cross-section.

Nutrient Budget

The Submissions Report must provide a nutrient budget and map for the Oaklands Agricultural Area and detail how nutrients are currently managed and how they will be managed in the future. The nutrient budget must assess the level of phosphorus, nitrogen, and potassium against the current baseline of soil nutrients at the site.

Crown Lands

The Submissions Report must outline negotiations with The Department of Planning, Industry and Environment – Crown Lands and describe how the Proposal will be lawfully carried out on Crown lands parcels and waterways (the ocean) and areas subject to Aboriginal Land Claims/ Native Title.

Bushfire risk

As the Proposal is located adjacent bushland classified as Vegetation Category 1 for bush fire risk the Submissions Report must consider the aims and objectives of *Planning for Bush Fire Protection 2019* including detailing how:

- Equipment will be designed and housed to minimise the impact of bush fires on the capabilities of the infrastructure to operate during bush fire emergencies.
- Equipment will be designed and maintained so that it will not serve as a bush fire risk to surrounding bushland.

Impacts to Maritime traffic

The Submissions Report must assess construction impacts to maritime traffic and waterways and consider advice provided by NSW Maritime relating to exclusion zones, signage, consultation for upcoming works, and compliance with relevant standards.