

I/we wish to lodge a submission against the proposed upgrade.

Main points:

- The outfall pipeline needs to be as short as possible to allow for discharge if and when needed. Length to be considerably shorter than the proposed 3.5 km pipeline.
- Reasons for a shorter pipeline of approximately 200m – 500m are to use funds towards an increase in recycling, provide our farmers with valuable wastewater and to keep microplastics and pollutants out of our marine environment. (AECOM 5.0 Conclusions dot point 4 page 16 of 39. Appendix A Dilution Required Calculations and Water Quality Assessment)
- **DISPERSION:** In comparing the existing beach face outfall with location 1, seems to be little difference in the dispersion to warrant the \$30+ M expenditure of a 3.5km pipeline. (figures 26 & 27 AECOM Merimbula Sewage Treatment Plant Upgrade and Ocean Outfall Appendix Q – Dispersion Modelling Report D – 5) A shorter outfall than location 1 will also have similar dispersions while satisfying the need for discharge at a substantial saving of funds.
- **TREATMENT AND DISCHARGE:** Additional treatment as stated by AECOM (Merimbula STP Upgrade and Ocean Outfall Appendix P – Climate Change Risk and Adaptation Assessment Technical Report Page i) begs the question, why do we need to waste funding on such a long pipeline if treatment is increased when a shorter pipeline would suffice?
- **CLIMATE CHANGE:** Given the latest information on increasing drought scenarios, this wastewater should be harnessed at 100% levels for every year possible. Farmers willing to take more than this STP produces have made contact with the EPA and BVSC ( December 2020). Very irresponsible to throw this valuable resource away when we have the means to add value to our local economy, environment and social welfare with this one resource.
- **DROUGHT IMPACT:** *“Drought is likely to impact on operation of the STP through changes to inflow resulting from water restrictions and reductions in groundwater infiltration (through lowering of the water table), as well as an increase in dust/particulate infiltration into the STP screens. From a positive perspective, increased incidence of drought would support the increased re-use of treated wastewater, minimising the need to use the diffuser and ocean outfall for discharge.”*(4.3.5. AECOM Appendix P Climate Change Risk and Adaptation Report) SWAMP urges BVSC and AECOM to reconsider the expensive 3.5km pipeline and opt for a considerably shorter version.



