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**A Submission to the Merimbula STP upgrade and Ocean Outfall Environmental Impact Study**

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As a local Agricultural Consultant I find it astonishing that water reuse is not being seriously considered in the terms of the current STP upgrade. This lack of interest in reuse is not consistent with modern business thinking where effluent is seen as a resource rather than a liability. Bega Valley Shire Council (BVSC) does run a reuse system as part of the current Merimbula plant and on a small scale at Wolumla, so it is hard to understand why the expansion of this model is not the priority.

Water reuse is common practice in a number of different situations and under different jurisdictions up and down the NSW coast line. A review of the Northern Shoalhaven - Reclaimed Water Management Scheme (SREMS), completed in April 2020, highlighted the long term value of that scheme, not only to the farmers directly involved but to that region's economy and community.

The dairy sector has been working in this space for some time not only with, on farm effluent, but waste water from domestic (as per the SREMS system) and manufacturing origins. Our industry has the skills to manage and use this resource. This is one of the ways the industry groups plan to "de-risk" the sector as per the letter of support from Dairy NSW, attached with this submission.

In the time since the initial report was released, power generation and carbon costs associated with Scheme 3B have seen dramatic reductions. This alone warrants a more timely review. In addition, in that report 3<sup>rd</sup> party end users, were seen as a risk. I suspect this was the outcome because there was little effort put into picking the right project partner. I have clients who recognised the long term value of that resource and would be pleased to make significant investments and contract agreements to ensure those concerns over 3<sup>rd</sup> party end users are addressed.

While the objectives of the proposed project are valid, we cannot continue to discharge wastewater from the beach outfall. The proposed outfall model removes a valuable resource from the local farming sector which we know will be subject to more environmental challenges from droughts in the medium term.

It is clear that a better way to address the problem of increased waste water generation in the region is to reuse and recycle with systems similar to Scheme 3B in place in a number of regional centres. Please take the time to review and revise Scheme 3B from the original report and develop a plan that does not rely on ocean out fall. This will benefit the local farmers, the broader community and the environment.

Philip