

Monday 18th June, 2018



Ms. Veronica Lanigan
Manager SEPP (Waters) Review
Water & Catchments
Department of Environment, Land, Water & Planning
8 Nicholson Street
EAST MELBOURNE VIC 3002

Dear Veronica

Re: Draft SEPP (Waters) submission

Thank you for the opportunity to provide feedback on the draft SEPP (Waters) policy document that was released earlier in the year. This is a significant document for the water sector, and it plays an important role in contributing to investment decisions for South Gippsland Water.

Given the importance of SEPP to the water industry, South Gippsland Water commends DELWP for the engagement undertaken with the water industry through VicWater, with a focus on the priority clauses of discharges and mixing zones, sewerage management and containment, offsets, and onsite wastewater management.

South Gippsland Water note, and welcome, the incorporation of risk-based prioritisation for upgrading sewerage infrastructure to contain 1-in-5 year rainfall events. This will allow the Corporation to determine and assess the risks to beneficial uses when prioritising infrastructure upgrades identified during sewerage modelling and master planning processes. The Corporation echoes the industry submission by VicWater, and agrees that the assessment of 'practicability' by the regulator will be an important factor.

South Gippsland Water welcomes the opportunity to work more closely with local council to develop options for their Domestic Wastewater Management Plans, and note that a formal response to council regarding their Domestic Wastewater Management Plan will be a requirement of the revised SEPP.

The Corporation also notes that Corner Inlet will have a separate environmental segment, with newly defined pollutant load reduction targets. The Policy describes that the load reductions for Corner Inlet will be achieved by the West Gippsland Catchment Management Authority (WGCMA) coordinating management actions to implement the Corner Inlet Water Quality Improvement Plan (WQIP), which was developed in 2013. The WQIP outlines that whilst wastewater treatment plant outfalls

need to be managed, their contributions to sediment and nutrient load in the Corner Inlet Ramsar site is low overall. The works program of the WQIP lists the upgrade of the Foster wastewater treatment plant as one of the activities for implementing the improvement plan. The Corporation's Foster WWTP is in compliance with its EPA licence, and upgrade plans for the site have been revised since the WQIP was developed. South Gippsland Water will engage with the West Gippsland Catchment Management Authority to give an update on plans for the site.

We would like to thank you again for the opportunity to provide feedback, and acknowledge that South Gippsland Water looks forward to continuing to work with DELWP and EPA through VicWater to develop important guidelines to assist with implementation of the new SEPP (Waters).

Yours faithfully

Philippe du Plessis
Managing Director