

NO.	CLAUSE	RESPONSE / COMMENTS (Provide Initials and Comment within document)
6	definitions - attenuation	Chemical degradation may also be abiotic
6	Definitions - Attenuation zone	Is there any reason that an attenuation zone cannot include water levels, eg around a waste water treatment plant
6	Definitions - background levels	This should say background concentrations . This way it is not confused with water levels eg mAHD
6	Definitions - high water	Does this adequately allow for expected changes in water level due to climate change over the life of the SEPP?
6	Definitions - line of evidence	This is a particular definition for a particular purpose. However this terminology is also used to present an argument that a particular event is occurring where you have no one factor that definitively supports the hypothesis, but a number of factors that together indicate that the event is occurring. The use of the definition for the former should not exclude the latter.
6	Definitions - non-aqueous phase liquid	The liquid may not have a low solubility - the critical aspect is that the concentrations of this chemical exceed the solubility limit
9	Segments of the water environment	Request that segments map be available in GIS. Clarify boundaries and method to determine what segment your site fits in.
14	Beneficial uses of all waters	For Cultural Heritage, does a specialist need to be engaged?
14	Beneficial uses of all waters	For Groundwater -does it make sense to protect groundwater for stock watering in urban areas, when this wouldn't be allowed in an urban area under planning laws
17	The environmental quality indicators and objectives	Clarification is required around calculation of biological indices. Need to update duidliens to clarify taxonomy to be used for calculations of number of families, SIGNAL 2 AUSRIVAS. Vlakes method is 2010, so confirm that taxonomy to be used for the number of families is thos limited to the Vlakes scores, or should it include other macroinvertebrate families observed? (PM), clarification of the process for lidentifying cultural values within groups. Potential for increased time to complete assessments
17	The environmental quality indicators and objectives	"the level of any indicator must not be greater than" - Clause 17 (4) This wording requires a number based compliance rather than a risk based compliance. This is contrary to the risk based approach specified in the NEPM and (what we understand) will be in the new EP Act. ie it says that the level of any indicator must not be greater than the investigation levels.... Are they investigation levels or compliance levels? this is also an issue in the text on P95.
23	Approval of mixing zones	Be good for EPA to give some guidance on what an acceptable distance is for a mixing zone for different waterways linked to the environmental values of that waterway (JG)
53	Prevention of groundwater pollution	Clause 17 (3) (a)"The environmental quality indicators and objectives specified in Schedule 3 will apply to all waters except if the background levels of waters are better than the environmental quality objectives, in which case the background level will become the objective for the purpose of this Policy" Clause 53 "A person must not, so far as practicable, pollute groundwater" These statements don't align. Clause 17 refers to a compliance concentration, Clause 53 refers to a polluting impact (determined by risk assessment).
54	Direct waste discharge to groundwater	What is the defintion of waste?
55	Non-aqueous phase liquids	The previous version of the SEPP included a specification that NAPL could remain in place "...if the Authority was satisfied that there was no unacceptable risk posed to any beneficial use by the NAPL". The new wording does not allow a risk based approach to the requirement to clean up, but requires clean up if it is practicable.
56	Rising water tables	The requirement to manage rising water tables only applies when "a protection agency receives an application for the discharge, deposit or disposal of waste to land..." The requirement to manage rising water tables should be broader than this, eg if there are unplanned leakages that cause land salinisation
58	Groundwater attenuation zones	Is there any reason an attenuation zone can't include groundwater level attenuation?
S3	Schedule 3: Environmental Quality Indicators and Objectives	The level of ecosystem protection (%) and the ecosystem description are not consistent with those specified in ANZECC. The top of table 3.4.1 in ANZECC 2000 describes values shaded in grey as "slightly to moderately disturbed systems". These greyed values are a mix of 95% and 99% protection. Note that the values in grey boxes were adopted by NEPM
S3	Schedule 3: Environmental Quality Indicators and Objectives	"For toxicants sediments, 'low' and 'high' refer to sediment values in the ANZECC Guidelines" These are not the latest sediment quality guidelines. This should refer to the SEDIMENT QUALITY ASSESSMENT, A PRACTICAL GUIDE, SECOND EDITION, EDITORS: STUART SIMPSON AND GRAEME BATLEY. CSIRO 2016. Note that these are the same people who wrote the original 200 guidelines

Other general items	General feedback, there could have been more consultation with consultants that typically carry out compliance work for water managers.
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