

Hi,

I have some general and specific feedback about the SEPP WoV relating to climate change and stream flows.

In general, I found the Policy to lack any consideration of climate change and how a drying, warming climate may influence (either positively or negatively) the Policy and how it may be implemented.

More specifically, I am interested in the way that that any benefits (real or perceived) from the input of treated wastewater to streams are devoid of mention. That is, I believe there are significant benefits arising from the discharge of treated effluent to waterways that are being overlooked or ignored in favour of an embedded view that wastewater entering waterways must, by definition, be bad.

The SEPP document has a necessarily significant focus on reducing pollutants entering waterways; and I accept this is the primary role of the Policy. However, by neglecting to acknowledge the fact that treated wastewater can and does play an important role in bolstering stream-flows, it has the potential to cause detriment to the many 'beneficial uses' it aims to protect. In a future drier climate, we may end up cursing decisions made that allowed treated wastewater to be removed as an input to streams and used instead to water orchards or maintain public green spaces. I have no contention with the use of wastewater in this way, but there's a fine balance to be had here. As such, guidance to make these decisions in a logical and considered way needs to come from government policies. And the SEPP seems to be exactly the type of policy to assist with decision making in this area – where environmental effects may be experienced from a decision one way or another.

A simple example might be the withdrawal or wastewater discharges from a waterway that has been receiving them for say, 30 years. The organisms and ecological communities that have adapted to those bolstered stream flows are not even considered under the current, or proposed SEPP. As such, (and as I understand it) the decision to move to 100% irrigation of that wastewater can currently be made based on a large number of factors relating to the proposed receiving land, without any consideration or assessment of the possible negative consequences on the environment the water is being withdrawn from.

It's a simple and environmentally sound principle that withdrawal of natural flows from waterways for irrigation, drinking water etc. should be well regulated. But I also believe that in a lot of circumstances, the diversion or complete withdrawal of inputs (such as wastewater) should also be considered in an equally rigorous way. And as our climate warms and dries, getting the balance of water in and out of streams will become ever-more important.

Notwithstanding valid questions of discharge water quality, the input of treated wastewater to streams should be specifically acknowledged in the SEPP WoV as protecting certain beneficial uses by rendering streams, and the species and ecosystems they support, more resilient to the effects of climate change.

Thank you for the opportunity to provide feedback and please feel free to contact me if you require further information or clarification.

Cheers,