

**From:** [Duncan Dey](#)  
**To:** [submissions](#)  
**Subject:** Public Exhibition Byron Shire Recycled Water Management Strategy  
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G'day Council

I submit the following on the Byron Shire Recycled Water Management Strategy, on Public Exhibition until 3 August 2018.

1. the use of the words "Recycled Water" in the document's title and its Vision (page 5) diverts attention from what should be the most important endeavour of this strategy, resolution of the fates of all liquid streams from the Shore's STPs. The document's original title "Byron Shire Effluent Management Strategy" implied full coverage of all effluent streams and should be re-instated. Please apply the PUB test: is the water we dump into the Brunswick River being recycled? No. Apply another test at the Objectives on Page 5: once we've maximised effluent reuse from the sewer system, is the remaining component (not reused) being recycled. No.
2. the Council operated rural scheme, Main Arm Recycled Water Scheme, was extremely successful after inception in 2002 disposing of all of the town of Mullumbimby's effluent in dry weather (about 1ML/day). It could have done the same throughout the drought of several months in 2017 but didn't, for various reasons yet to be discerned and discussed. One such reason is the cost of electricity. After subsidy in its early years, the two irrigators became liable for 100% of power costs. The scheme now falls short of community aspirations. Council is unwilling to spend sewer funds beyond the farm gate. This community asset is sitting idle, is capable of great achievement and should be revitalised rather than moth-balled under this the Strategy.
3. rural reuse projects have capacity to utilise very high volumes of effluent - for example, 100% of BVSTP's effluent in dry weather. Council's not working cooperatively with private landowners is the greatest factor preventing the development of rural schemes. If uptake were spread across many farms (including Council's own enterprises such as Vallances Road) risks such as sale of land or a change of business would not impact greatly on Council's ability to achieve the goals and objectives of this Strategy. Cooperation with small businesses and farming enterprises to achieve the community objectives such as those for effluent management should be one of the principles of good local government.
4. the Strategy should name and pursue a key aspiration for effluent management in Byron Shire: for it to be released to the environment as far as possible from ocean, and from its tributary waterways. Sadly, opportunities to release it close to its original source are not possible because urban water supply sources are at high elevations on Rocky Creek and Wilsons Creek.
5. the Strategy should nominate a further management key: to ensure that future increases in effluent volume are limited to the uptake of reuse. Although this aspiration has been documented for over a decade (Byron Bay Effluent Management Strategy 2005 and Council's approval to upgrade BBSTP 2006) there has been little progress towards it and no commitment to it.
6. the greatest benefit of 100% reuse of sewage effluent will come when there is zero disposal to waterways. The title of this document as a recycled water strategy would then be meaningful. The current race towards high-tech sewage treatment as "the" solution would cease and

funding that is currently directed towards it could be released for worthwhile land disposal endeavours. Similarly, such funding could also be directed towards load reduction, especially by reducing wet weather flows from their current high levels in the Shire's sewer systems.

7. reformat to remove blank pages such as Page 21 (last Page).

8. the Vision (page 5) needs a rewrite to:

Sewage effluent will be managed in an ecologically sustainable way to have no adverse impact on the natural environment and to achieve maximum resource recovery.

5. Guiding Principles should be added, saying:

Consideration of the nature of the receiving environment and of options for effluent reuse and/or disposal, determines the level to which wastewater must be treated.

The nature of sewage reuse and disposal may limit the scale and nature of land-use within a catchment.

Sewage or effluent disposal to waterways is a last resort. It will be reduced from current levels. There is currently and never will be disposal to the ocean.

Growth in sewer load is to be matched by increased reuse. Land disposal is preferred to disposal in water.

6. the Objectives (page 7) need a rewrite to:

Reduce sewage generation (the term "wastewater" is out-of-date)

Eliminate effluent discharge to waterways, unless environmental benefit to the waterway is proven

Until they are eliminated, monitor and manage the impacts of effluent discharge to waterways on the aquatic environment

Maximise effluent reuse from the Shire's sewer systems (plural)

Use evapo-transpiration as the preferred mechanism for assimilation of effluent into the environment

Recycled water as close to its water source as possible

Increase the benefit from recycled water as a resource to achieve broader environmental objectives (while ever EPA issues discharge licences for free, this remains the most economic option)

Require new development to match its increased sewage loads with increased recycled water use

Prioritise and fund effluent management to achieve these objectives.

Note: my notes in brackets are for you, not for the document.

Cheers, Duncan