

**Submission**

**No 10**

## **INQUIRY INTO MANAGEMENT OF DOMESTIC WASTEWATER**

**Organisation:** Richmond Valley Council  
**Name:** Mr Andy Edwards  
**Position:** Environment Health Officer  
**Date Received:** 15/12/2011

**Council Reference:**  
OSMS:AE

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**Andy Edwards**

15<sup>th</sup> December 2011

Committee on Environment and Regulation  
Parliament House  
Macquarie Street  
**SYDNEY NSW 2000**

Dear Chairperson

**Richmond Valley Council: Submission to Inquiry into the Management of Domestic Wastewater**

Richmond Valley Council (RVC) regularly attends meetings of the Northern Rivers Regional Food Group and the Regional On-site Sewage Management Officers. Recent meeting at both of these groups have discussed the inquiry and both groups agreed that it would be good to invite committee representatives to the area to discuss the terms of reference.

Richmond Valley Council is currently in the middle of reviewing and updating its On-site Sewage Management Strategy, as are neighbouring Northern River Councils. RVC has a program to inspect all existing on-site sewage management systems and has inspected all high risk systems to date.

Discussion within Richmond Valley Council and the above two mentioned regional groups have raised the following matters for consideration as part of our submission:-

1. Penalty Infringement Notice's (PIN's) – Council to be able to issue plumbers with PIN's for such offences such as (a) illegal works/works without approval by a plumber or tradesperson (b) new on-site sewage management system installations that fail within 12months (or period of time to be decided by committee)/defective works (c) unlicensed person undertaking plumbing works.
2. The issue of non registered/licensed trade persons and the fact they keep on undertaking works and Councils are powerless to take any action other than court proceedings which is timely and expensive. Council would like to issue a PIN for this offence i.e. some people are undertaking plumbing work with out being qualified. Council reports this to the Department of Fair Trading but the trade person continues to undertake works.

3. There was a discussion on 'suitably qualified person' and the need for minimum training/certification requirements for on-site sewage management consultants. There are training providers, such as the Centre for Environmental Training in the Newcastle area, that run courses in on-site sewage management and courses similar to this could be used as a minimum requirement.

There are numerous consultants who prepare on-site sewage management reports but do not have any experience in the field. An example of this is some engineering or planning firms prepare reports as part of a package and have limited experience. The submission of these sub-standard reports to Council takes up considerable Council resources.

4. Aerated Wastewater Treatment Systems (AWTS) require quarterly servicing as per NSW Health accreditation. There is a growing trend for AWTS to have sub-surface drip irrigation as the disposal method. Council is concerned that the sub-surface drip irrigation is not being serviced regularly i.e. that the drip lines are flushed a minimum of every 3months.

Flushing and servicing of sub-surface drip irrigation is left as responsibility of the owner and for Councils to regulate through the approval process. Some AWTS service providers do undertake flushing as part of their quarterly service.

5. The design of sub-surface drip irrigation. RVC and Lismore City Council are moving towards ensuring that all sub-surface drip irrigation designs are designed and certified by a certified irrigation designer. Designs are currently submitted to Council by plumbers and consultants some of whom do not have a basic understanding of sub-surface irrigation design. This can lead to the incorrectly sized pump being installed and failure in some sections of the irrigation field.

6. Presently not all Councils undertake inspections of existing on-site sewage management systems. These Councils only inspect new installations or following a complaint. Reasons for not undertaking inspections of existing on-site sewage management systems range from politics within a Council to funding. This is of particular concern for coastal Councils that have oyster leases or are a holiday destination or that have waterways that are used for recreational purposes.

Please consider the above points and also the possibility of arranging a meeting with Northern Rivers Councils to discuss the terms of reference and any other issues related to the management of on-site sewage management systems. Richmond Valley Council is willing to facilitate such a meeting.

Please note that at the time of writing Council has not had time to fully comprehend any changes to plumbing requirements as stated in the new NSW Plumbing and Drainage Bill.

If you wish to discuss this matter further I can be contacted at Council Chambers between the hours of 8.00am and 10.00am Monday to Friday on (02) 6660 0283.

Yours faithfully

Andy Edwards  
**ENVIRONMENTAL HEALTH OFFICER**