Submission

No 17

INQUIRY INTO MANAGEMENT OF DOMESTIC WASTEWATER

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Management of Domestic Wastewater (Inquiry)

The Committee Manager

Committee on Environment and Regulation
Parliament House, NSW

I have spent the last 20 years on the Nth Coast of NSW consulting, designing, suppling, installing and servicing waterless composting toilets for both domestic and commercial applications and in both urban and rural locations.

With respect to the Terms of Reference I would like to make the following comments;

a) Food Safety

- Regulations need to be based on science not fear.
- Simply identifying the risks and then closing down all chance of highly unlikely events that are of little consequence by regulations is totally self defeating. There needs to be a focus on risk assessment that is based on a quantitative approach
- The World Health Organization provides a quantitative microbial risk assessment of the use of excreta and greywater in agriculture in the 4 volumes of *Guidelines for the Safe Use of Wastewater, Excreta and Greywater.* These can be view and downloaded at http://www.who.int/water_sanitation_health/wastewater/gsuww/en/index.html
- The above WHO Guidelines need to become the mainstay of how NSW approaches its concern to protect and safeguard food. These very extensive documents have come out of much of the work from Sweden and Scandinavia. Cultures where animal excreta remains a prime source of nutrients for agriculture. For over a decade Scandinavia counties have embraced the concept of safely returning human excreta back to farmlands
- Much of Australia's regulations have come from that of the USA- a culture based on fear with little consideration for the bigger wholistic picture and reliance on the dwindling supply of artificial chemicals and fertilisers
- With respect to wastewater regulations pertaining to sustainability in Australia we have missed the whole point. In the short term our regulations might attempt to protect public health and the environment, however, only when the nutrients within domestic waste streams are able to be returned to whence they came – largely the farmlands can we consider our practises anywhere near sustainable.
- Our current culture of fear of the use of domestic wastewater and human excreta in agriculture must be superseded by regulations based on quantitative risk assessment that allow for the cycling of nutrients back to places that grow food. Only then can we be seen to be acting sustainability
- *'…..sustainability can be described as the ability to plan and manage the use of excreta and greywater in agriculture as important resources in such a way that human health is not compromised, nutrients are recycled for food production and negative impacts on water resources or the environment are avoided.'* - page 4 Volume 4 *Guidelines for the Safe Use of Wastewater, Excreta and Greywater- WHO*

b) Current Regulations

- Complexity of regulations and the cost of compliance of domestic wastewater management have increased disproportionately to the risk to public health or the environment compared to that of many other activities . Large producers of waste water and harmful runoff receive a

much lower level of regulation. Eg. All domestic wastewater no matter how well treated or how removed from waterways must be 'disposed' under ground, while all urban centralised sewage systems have licences that allow treated effluent to be disposed into waterways. Even the most modern and complex of centralised urban systems add nutrients directly to waterways, Nutrient runoff direct to waterways from agriculture is largely unregulated.

- Current regulations for single households are driving many householders to choose the path of non compliance as they believe to comply is far too expensive, time consuming, frustrating and difficult and way beyond proven common sense practices to safe guard the environment. Eg. The $5-10,000 grey water only systems required for people with compost toilets. It is well known (and widely practised) that the dispersal of fresh greywater onto suitable vegetated areas can be of minimal risk on many sites. To contain greywater prior to its disposal by the mandatory use of large septic tanks or similar makes little sense as it putrefies that once relatively low pathogen count water into a dangerous high pathogen stinking effluent that then needs to be treated to clean it up and certainly only fit to be returned/disposed underground.
- Regulations needs to be a more considered, simpler and appropriate. Adding further levels of complexity is counter productive.
- City centric regulators, and scientists have little understanding or common sense that only living in the country can allow develop. Regulators and scientists are too far removed from their perceived problem. Many industry representatives and consultants encourages higher levels of complexity and expense to rural householders – it suits them very well.
- Money spent assisting householders is far more productive than money spent on paper work and policing. More regulation complexity and expense will only result in further non compliance and defiance
- Governments and Councils have the focused resources and regulations on problems of relatively low significance when big issues go largely untouched and appear too hard for the regulators and agencies.

c) Inspection Procedures

- The heavy hand approach- more inspections and more reports does not necessarily result in higher performance and levels of compliance. Already we have a situation that is burden by complexity of bureaucracy endless paper work, fees and applications

The regulation and management of domestic wastewater needs to looked at from a perspective of what is required of all landuses and activities on a whole catchment basis.

Australia needs to open its minds to the concept that it is failure of humans that has lead to human excreta being considered a waste product. With appropriate management human excreta is a nutrient resource for the growing of food without which human life can never be truly sustainable.

To build bigger walls to protect ourselves from the ever increasing production of waste is both expensive and doomed to failure – such simply grows the bureaucratic nightmare. Regulators need to look at domestic wastewater from a new perspective in such away that we can begin the paradigm shift to domestic wastewater and human excreta being seen as resources for food production.

Thankyou

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