

STORMWATER NSW

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The Metropolitan Water Directorate
Department of Finance and Services
McKell Building, 2-24 Rawson Place
SYDNEY NSW 2001

Re: Urban Water Regulation in NSW - Discussion Paper

I am writing to you on behalf of Stormwater NSW, on the Urban Water Regulation in NSW - Discussion Paper.

Stormwater NSW is a peak industry association with membership including most of the councils in the Greater Sydney Region, as well as numerous consulting and manufacturing companies. The aim of Stormwater NSW is to enable local practitioners and the broad community to learn about available stormwater management and quality technologies. Stormwater NSW is supported by the National Association and a strong network of state associations in Queensland, Victoria, South Australia and Western Australia.

With this understanding of the stormwater industry in Sydney, we are specifically writing to you in regards changes to regulation of stormwater harvesting schemes implemented by local councils. As shown on the NSW Government's Water for Life webpage, there are over 160 stormwater and roofwater harvesting projects in the Greater Sydney Region. Most of these projects are harvesting less than 10ML/year and have been designed to address risks via a multi-barrier risk assessment approach as suggested by the Australian Guidelines for Water Recycling.

We believe that the regulation of council stormwater harvesting recycling schemes should remain in its current form with reliance on self-regulation. An exception would be for very large schemes or very high risk schemes. Imposing expensive and onerous approvals processes on low risk schemes would be counterproductive to the objectives of many incentive schemes aimed to reduce the use of potable water for non-potable purposes. Typically these stormwater harvesting projects, cost in the order of \$1-300,000 and provide 2-5ML of water per year. Regulation and compliance of these schemes similar to that of larger scale sewer mining schemes would be prohibitive.

Please do not hesitate to contact me on 0413 609 722 or richard.mcmanus@stormwater.asn.au.

Yours sincerely,



Richard McManus
President
Stormwater NSW