

November 18 , 2011

ACWQIP
Water Quality Branch
Environment Protection Authority
GPO Box 2607
Adelaide SA
5000



**Conservation
Council SA**

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Dear Mr Pfennig

Re: Adelaide Coastal Waters Quality Improvement Plan.

As the peak conservation body for South Australia, the Conservation Council of South Australia (Conservation Council SA) welcomes the opportunity to comment on the Adelaide Coastal Waters Quality Improvement Plan.

Conservation Council SA is an independent, non-profit and strictly non-party political organization representing over 50 of South Australia's environment and conservation organizations and their supporters. Conservation Council SA has developed a comprehensive view of environment policy in "South Australia in a Changing Climate: A Blueprint for a Sustainable Future"¹ This document sets out, at a strategic level, policy positions in six key environmental areas, including water, and coast and marine issues.

Conservation Council SA is pleased to support the Adelaide Coastal Waters Quality Improvement Plan. We are very pleased that the recommendations for the Adelaide Coastal Waters Study did not go unheeded and that they are being addressed in the Plan.

One of our concerns is regarding implementation of the Plan. Whilst the Plan is comprehensive in its scope and will achieve significant reductions if implemented, we are concerned that the political will and financial support may be lacking. We acknowledge that a large amount of negotiation with a significant number of stakeholders has taken place, particularly those with a direct responsibility for implementation of actions, but this does not guarantee that the plan will be implemented in its entirety.

¹ <http://www.conservationsa.org.au/blueprint.html>

Reducing Pollution

It would be good to see some specific indication about how the Water for Good actions will be implemented to reduce the suspended solids loads from stormwater to meet the 2030 target. Whilst there has been some improvement in reducing suspended solid loads in stormwater in the 5 years to 2008, this needs to continue to be reduced. More than just research is needed. Some on-ground actions to clean up and re-use the stormwater are strongly needed. We support that actions associated with the following two Water for Good commitments be implemented to complement this Plan

- The now established Stormwater Strategy: The future of stormwater management in South Australia
- A master plan for effectively managing wastewater in Adelaide.

We support the continuation of all actions to further reduce nitrogen loads from WWTP water, and strongly support the need to keep increasing wastewater re-use levels from WWTPs. We recommend that funds keep being allocated for these expensive but important processes (e.g. along the lines of Christies Beach WWTP upgrade - now pipes wastewater to Aldinga, which will eventually be used for housing in Seaford area, etc).

We also strongly support all actions to reduce stormwater flows, suspended solids, nutrient loads and coloured dissolved organic matter.

Assisting Marine Recovery

The Conservation Council supports Strategy No. 7 (pg 71) to:

- Undertake seagrass mapping and rehabilitation work
 - 7.1 Develop and update 'seagrass ready' maps that integrate water quality and sediment information
 - 7.2 Further support for seagrass rehabilitation work

The Conservation Council strongly supports the completion and maintenance of 'seagrass ready' maps.

Beyond this, there is a need to plan for real action to rehabilitate 'seagrass ready' areas.

Given the challenge that even if all pollution to Gulf St Vincent could stop immediately, it would potentially take centuries for areas of lost seagrass to recover. It will be vitally important to start preparing for active assistance for marine recovery. It has been demonstrated that this could be achieved through the establishment of textured surfaces at a large scale in seagrass ready areas.

Therefore it is suggested that in addition to efforts by DENR, SARDI and universities in seagrass rehabilitation work, the role for SA Water, Penrice Soda Holdings and EPA **be confirmed** to contribute to this effort. Seagrass rehabilitation would best be managed as a capital infrastructure like project dedicated to restoring the natural capital and ecosystem services that our marine environment provides. Success would require a financial contribution from parties associated with contributing to pollution.

Climate Change

The section 7.4 (pg 80) Climate change and population growth impacts on coastal water quality is narrow in its focus and could be broadened to encapsulate the need to incorporate both climate change adaptation and mitigation challenges in this plan. This is important given that the technologies to reduce pollution can be highly energy and greenhouse intensive.

Despite a National carbon price planned to commence in July 2012, there is still need to find ways to reduce emissions at the same time as meeting other environmental and development challenges at a project level, so that it becomes easier for Australia's National greenhouse target and scheme caps to be reduced as fast as possible. We would therefore welcome defined commitments from all stakeholders to reducing emissions as a part of activities associated with this plan.

Specific comments

P49, paragraph at bottom of the page

The last sentence of this paragraph needs to be reworded as it does not currently read correctly. It suggests that nitrogen input from Penrice is 'sufficiently high', which is incorrect as it is widely acknowledged that nitrogen input from Penrice is excessive.

Tables 8 and 10

These two tables both show an 'ACWQIP target' column. However, unlike all the other columns it is not clear what year or timeframe this target is based on. When are the targets meant to be reached? None of the background information in section 6.1 provides any information about the ACWQIP targets and when they should be reached, especially since many of them are different to the forecast 2028 figures.

I would also be happy to meet with you or your representatives to discuss these matters in more detail.

Please contact me on Ph. 08 82235155 or email at tim.kelly@conservationsa.org.au if you have any questions or follow-up in relation to this letter.

Yours sincerely

A handwritten signature in black ink that reads "Tim Kelly". The signature is written in a cursive style with a large, stylized 'T' and 'K'.

Tim Kelly

Chief Executive