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Sent: Friday, 5 November 2004 6:37 AM
To: info@ncc.gov.au
Subject: final submission: Gary Smith

I oppose the recommendation to declare the SW transmission and interconnection service based on the following, and previously submitted, considerations;

- It has not been demonstrated that duplication or replacement of existing receival, transport, treatment, re-use and disposal facilities to any extent or in any form will have material benefit in terms of service or providing value-for-money to triple bottom line account or component account thereof

- The economic efficiency index of the proposal has not been established

- Current support for the proposal is based on emotive acceptance and

favour of SS as a potentially high level service provider on environmental grounds whilst promoting summary dismissal SW as a poor service provider

- Is the political and environmental support for the SS proposal based on

a value management study rather than dissatisfaction towards SW?

- The SW historical failure to provide significant off-stream water storages rather than on-stream ones is not grounds to hastily move towards expensive re-use options... large amounts of energy are required to treat sewage effluent in compact works occupying small footprints and elevating the product over large distances... the overall infrastructure and operating costs of the proposal would be prohibitive

- There is already a closed loop, natural water cycle on the eastern

seaboard..... creation of a closed loop within that cycle is not warranted...

solutions to the very different conditions west of the divide should not be routinely applied on the coast

- Desktop dissection of the infrastructure and services along with certain

"bundlings" are obvious manipulations of the situation to gain a determination one way or another based on semantics or legalistic grounds rather logic trains or just plain, good engineering

- Certain quarters have called for government support (perhaps financial)

for the proposal, perhaps without possession of simple specific statements of the core financial and service objectives of the envelope proposal

- In the broad sense, is it advisable for a \$7billion investment in this

sector of the economy as opposed to a truly national initiative which supports overall national objectives giving rise to an improved economy and higher standard of living for all

- The extent that the national economy is dependent upon SW expenditure

and charges needs to be examined prior to determination of the application under the guise of national significance or public interest

- Has regional Australia been made aware of the matter of national significance via local government associations etc?

- A supportive cost/benefit assessment and analyses of the implications of a positive declaration appear to be missing
- It is important not to emit misleading signals and create a dangerous precedent in the very important area of aqueous resource management
- It is far more effective to allocate scarce and limited resources to upper catchment initiatives rather than end-of-the-line solutions.
- Whilst SW has failed, to some degree, to deal with the trade waste, contaminant and stormwater fractions of the sewage stream (along with the sewage fraction of the stormwater stream) in terms of hydraulic capacity and quality control, the SS proposal to re-work the product of the process rather than manage the upper catchment ingredients of the process is illogical.
- The key issues of cost/benefit and public interest in the SW submission should be highlighted and not lost in what is, perhaps, an unwieldy document (presumably the proposal can be engineered and administered in terms of regulatory frameworks, OH&S, risk and liability..... recognition of this, certain reference to historical failures and an expose' of future plans and solutions would have enhanced the credibility of the SW submission)
- "The Earthmover & Civil Contractor" noted on 16 September 2004, apart from a \$1 billion project cost and potential proposal to seek equity funding from private investors, that the NCC's recommendation would be likely to be the one finally adopted....under these circumstances it would be of paramount importance to fully assessed prior to making a recommendation
- Has the NSW Health report on recycled water prepared by the interdepartmental working group been considered?
- Has the proposal and its expenditure been considered in the context of DIPNR's metropolitan strategy in the context of the identified nine directions as well as Cabinet's current workings on the Sydney metropolitan water strategy for water management across the Sydney metropolitan area?
- In December 1939, the President of the Metropolitan Water Sewerage and Drainage Board wrote: "what is possible for the future is very largely determined by what has gone before, and this is particularly true of the water and supply and sewerage of a great metropolis" (The Water Supply and Sewerage of Sydney, FJ Henry, Halstead Press P/L)..... the voice of SW and long-term water industry operatives needs to be valued
- It would be preferable to let SW get on with the business in which it has a long history..... 3 Dec 1952 (Sun) " Plan to end pollution of beaches...completion of stage 1 of Bondi treatment works.... "8 Jan 2003 "\$95 million upgrade of the sewage plant" (Telegraph)...
- All that is needed is a system of independent, value-management audits now and then....not fringe alternatives
- The water industry already has far too many uncoordinated players and

initiatives

Gary Smith, MIE (Aust)