

**Industry Feedback**

***qldwater*** *consolidated submission*

**Submission on Proposed End of Waste Code for Biosolids**

**November 26th 2019**

# Background

The Queensland Water Directorate (***qldwater***) is the central advisory and advocacy body within Queensland’s urban water industry representing the majority of the state’s public water and sewerage service providers, from small local governments up to major utilities including Queensland Urban Utilities and Unitywater. ***qldwater*** works with its members to promote safe, secure and sustainable urban water services for Queensland communities.

***qldwater*** works closely with the LGAQ and has maintained a keen interest in the development of the EOW Code for biosolids through Cr Anne Maddern who has represented local government sewerage service providers in ongoing meetings of a stakeholder advisory group convened by the Department. The opportunity offered by the Department for ***qldwater*** to send a representative to attend the final meeting of this group is acknowledged.

This document summarises feedback from the urban water sector through discussions with members and written feedback from sewerage service providers. In general, the urban water and sewerage sector is supportive of the modified EOW Code and there is broad interest in remaining engaged in the ongoing development of this Code.

#

# Feedback

**p.6 Table 1 Resource quality criteria**

A number of councils queried the meaning of Section 6.2, section 3 (a), (b) and (c). The Department has done well to provide flexibility in these clauses while keeping them terse. The trade-off is that they are not immediately clear to new readers. A high-level edit could help, perhaps with the addition of dot points to clarify the sub-requirements of each clause. Section 6.2.3(c) could be clarified as to the blending of ‘lower-grade’ biosolids with others to meet the contaminant requirements.

**p.9 Definition of “Undue-risk solids”**

Do “undue-risk solids” have to go to landfill, or can they be blended with other biosolids? Is there an ability to test to confirm that the risk is low (such as measuring *E. coli*)?

**p. 7 Table 3 Organic Fluorine**

The temporary removal of a Total Organic Fluorine level was supported by all councils consulted, as was the use of an appropriate TOPA. Current methods are seen as inappropriate, inconsistent and inaccurate and the larger councils in regional Queensland have agreed to work together on better understanding methods for quantifying PFAS risk of biosolids consistently and validly. The sector requests further engagement with the Department as it develops this methodology and new limits.

**p. 7 Table 4 and small councils**

1. There is no clear allowance in the code for biosolids from facultative lagoon plants which would need to undertake physical testing to validate additional volatile solids reduction (AVSR) to meet the requirements in Table 4. This table includes AVSR for anaerobic and aerobic processes but nothing specific for facultative lagoon plants. An alternative option could be useful such as combining oxygen uptake and volatile suspended solids data to a Specific Oxygen Uptake Rate (SOUR).
2. Case studies or worked examples provided to help smaller, less well-resourced councils understand their options to meet Table 4 requirements would be useful.

**p. 13 Elements (e.g. copper) in concentrations less than background soil**

There is evidence that background concentrations of copper in soil can be higher than the prescribed limit and that the toxicity is highly dependent on the type of soil. The Code should allow for cases where natural levels in a soil are higher than the limits, and in this case allow biosolids with a lower concentration to be safely used on the site.

**p. 17 Definitions – Appropriately designed facility**

Requirements for managing run-off of contaminants from biosolids during mixing or temporary stockpiling should be proportionate to risk and outcome focused rather than prescriptive.