



DRAFT Onsite Wastewater Management Plan 2025-2030

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Draft Onsite Wastewater Management Plan 2025-2030

This document is the first **draft version** of the proposed Swan Hill Rural City Council Onsite Wastewater Management Plan 2025-2030 developed for public release and consultation.

The appearance, format and some content are likely to change after the public consultation period has concluded; to incorporate public feedback and the graphic formatting necessary to prepare this draft as a final strategic document of Council.

Acknowledgement of Country

Swan Hill Rural City Council acknowledges the traditional custodians of the land in which we live, and pays its respects to their elders, past and present.

Executive Summary

Under section 29 of the *State Environment Protection Policy (Waters)*, councils that manage onsite wastewater management systems (OWMS) within their municipality are required to develop an *Onsite Wastewater Management Plan* (OWMP) in consultation with the local water authority and community.

The purpose of the Swan Hill Rural City Council OWMP is to:

- Identify current responsibilities, practices, procedures and obligations for domestic wastewater management within the Swan Hill municipality;
- Identify and prioritise the main environmental and public health risks posed by wastewater within the municipality;
- Improve and enhance the public health and environment protection measures undertaken by Council to address the identified wastewater threats within the municipality; and
- Assist with long term planning and development of un-sewered areas in the municipality.

This OWMP will provide an informed and targeted direction, through the Action Plan, for Council and its wastewater partner agencies to action the strategies that address the wastewater issues facing the municipality over the next five years.

This Plan will be implemented in conjunction with other key strategic Plans of Council *The Community Vision and Council Plan 2021 – 2025*, which incorporates the following vision: “*Built on strong foundations that embrace our rich history and natural environment, our region will be a place of progression and possibility, we are a community that is happy, healthy and harmonious – we are empowered, we are respectful and we are proud.*” Further strategies to achieve this include, good governance, risk management and services and programs.

The action plan of this OWMP will satisfy the Council strategy, of *Careful and responsible management of our environment for a sustainable future*. This will be achieved through a collaborative approach with Council’s internal and external wastewater management partners.

Note: All references to the Council Plan 2021-2025 throughout this draft OWMP will be updated once the new Council Plan is complete. Council Officers will assess the new Council Plan and assess where there are connections and links to the new visions and strategies.

Specifically, the OWMP provides Council with a:

- Planning tool to enable long term strategies to be developed for wastewater management;
- Framework to facilitate decision-making and policy about individual OWMS installations, including enforcement and compliance options.

The Onsite Wastewater Management Plan which has been divided across **4 key areas**:

1. Information Management
2. Education and Awareness
3. Regulatory Management
4. Collaboration and Review

Improvement of wastewater management within the municipality will also rely upon:

1. Solution driven and collaborative partnerships with communities;
2. Clear policy to facilitate decisions;
3. Commitment to advocate and facilitate improved outcomes by Council, water corporations (authorities) and EPA Victoria;
4. Inclusion in Council’s Plan, budgetary processes and linkages to other key policies such as the Municipal Public Health Plan and any relevant Council Storm Water Management Plan(s); and

Availability of State funding and legislative change to facilitate and implement improved wastewater management in the long term. To implement these recommendations a range of resources must be committed. Structured coordination of Council's existing environmental strategies and combined internal capacity toward implementation of the objectives. The actions of the Plan have been set across a 5-year timescale. This is to allow enough time for the scope and objectives of the Action Plan to be properly resourced and implemented.

1. Introduction

Onsite wastewater management is one of the public health functions delegated to local government under the Environment Protection Act 2017. Under the legislation Council is the permit authority for the installation and use of septic tank systems. There are also further responsibilities outlined in the State Environment Protection Policy (Waters of Victoria).

Domestic wastewater planning is about the management of wastewater generated from toilets, kitchens, bathrooms, workplaces and public buildings. When sewerage is not available to properties, domestic wastewater must be managed onsite via an Onsite Wastewater Management System (OWMS). The environmental impacts associated with domestic wastewater are due to the many pollutants it contains, including:

- human faeces and waste products;
- particles of food, dirt, lint;
- oils and greases; and
- chemicals derived from detergents and other cleaning products.

These pollutants can build up in the soil, damaging its structure, altering soil acidity/alkalinity balances and harming plant growth. Wastewater pollution can also present human health risks, cause odours and attract vermin and insects. Microbial contaminants such as bacteria, viruses and algal blooms pose significant public health risks. The excess nutrients present in domestic wastewater can harm aquatic life and cause waterway conditions to become toxic.

To ensure the health of our environment and that of our residents, visitors and those working in the municipality, Swan Hill Rural City Council has a number of significant roles and legislative responsibilities. One area of that control is in the effective management and disposal of wastewater. Wastewater, if not managed effectively, can pose a significant public health, environmental, legal and economic risk. Poor wastewater management threatens Council values and undermines the municipality's ability to attract more residents, businesses and tourists to the area.

State legislation requires that Council develops an Onsite Wastewater Management Plan (OWMP) to effectively manage the disposal and treatment of wastewater, where properties do not have access to reticulated sewerage systems. Many townships within the Swan Hill Region are reliant on septic tank systems and the subsequent disposal of treated effluent.

According to Council's database there are around 4,000 recorded septic tank systems within the municipality. The age of these tanks' ranges from 1960's – 2024. Of these systems, over 50% are older than 20 years. In many cases, these systems do not comply with the current wastewater standards having been approved under the lower treatment and discharge requirements of now superseded standards; with many systems (historically) approved for offsite discharge.

2. Overview of OWT plants in Swan Hill

An onsite wastewater treatment (OWT) plant is a treatment plant for the bacterial, biological, chemical or physical treatment of sewage generated on-site. For example, a septic tank system, a wet or dry composting toilet, aerobic treatment and a sand filter (EPA, publication 1974). Across Swan Hill, the two most common methods of wastewater treatment are primary treatment septic tank systems and secondary treatment often via an aerated wastewater treatment system (AWTS).

Primary treatment (often known as septic tanks)

The modern primary treatment system is usually a concrete or plastic in-ground tank with two internal chambers separated by a baffle. The tank holds and treats wastewater from the kitchen, bathrooms, laundry, and toilets. The tank houses a living ecosystem of bacteria that decompose the organic material, treating the solids and wastewater before it is drained into the natural environment using an effluent disposal system, most commonly via absorption trenches.



Figure 1: A typical septic tank system installation

Absorption trenching incorporates perforated PVC piping to transport wastewater allowing it to pass through stone aggregate before being absorbed into the existing earth surrounding the trench. Trenching is one type of land application system available; and is the type of land application predominantly utilised for primary treatment systems.

The main maintenance requirement specific to primary treatment system is the removal of the build-up of solids every 3-8 years. This occurs via a pump-out of the accumulated sludge performed by specialist contractors; and is commonly referred to as “de-sludging”. If these solids are not removed, they can carry over to the disposal area, causing odour problems and the trenching to fail. Typically primary treatment systems have no moving parts and generally require no power.

Secondary treatment systems (AWTS)

Secondary treatment systems pass wastewater from a primary treatment tank into a second treatment process, this can include aeration (often by electrically powered blowers) or via polishing filters.

The current most common secondary treatment method of aerated treatment systems (AWTS) also uses clarification and disinfecting chambers with sludge returned to the primary treatment tank. Aerated treatment systems require regular maintenance by a suitable service technician, as well as a reliable power supply. The tank requires pumping out approximately every five years.

AWTS are designed to discharge their (secondary) treated wastewater to land via sub-surface drip irrigation. Sub-surface drip irrigation can only receive secondary treated wastewater to function properly.

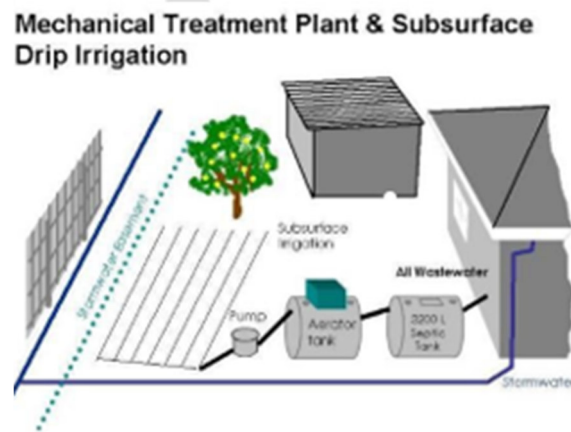


Figure 2: Images showing typical AWTS with sub-surface irrigation layout

Other types of systems found within Swan Hill, could also include:

- Older 'Split' systems; and,
- Septic into Sand Filter systems.

3. Regulatory framework

Council has to articulate, administer, and ensure compliance with a comprehensive and complicated policy and legislative framework specific to the management of domestic onsite wastewater management. This includes several State Acts and subordinate legislation, along with guidelines, Codes, Australian Standards and local policies.

In July 2021 the *Environment Protection Act 1970* was superseded by the *Environment Protection Act 2017*, which establishes a new framework for environmental protection and is underpinned by the general environmental duty (GED) and duties for waste, contaminated land, and incident notification and management. Much of the content of SEPP (Waters) has been replaced by the Act, its Regulations, and the Environmental Reference Standard (ERS), or through new guidance published by EPA.

A limited number of clauses in the SEPP (Waters) will remain in force under the Environmental Protection Transitional Regulations 2021. This has allowed time for the Department of Energy, Environment and Climate Action [DEECA (formally known as Department of Environment, Land, Water, and Planning)] and the EPA to consult with duty holders to identify the most suitable replacement instrument to address these clauses.

However, where content is not directly replaced under the new legislative framework, or EPA has not yet published new guidance, the information in those clauses of SEPP (Waters) may continue to provide a useful source of information to aid duty holders and regulatory decision-makers.

Victorian State Legislation

- *Environment Protection Act 2017*
- *Water Act 1989*
- *Planning and Environment Act 1987*
- *Public Health and Wellbeing Act 2008*
- *Local Government Act 1989 and 2020*
- *Building Act 1993*.

Subordinate legislation, Policy, Codes, Strategies and Guides

- *Environmental Protection Transitional Regulations 2021* – retain limited State Environment Protection Policy (Waters) clauses
- *Environment Protection Regulations 2021*
- EPA Publication 1974: Regulating on-site wastewater management systems (local government toolkit)
- EPA Publication 1976: Guidance for owners and occupiers of land with an OWMS equal to or greater than 5,000 litres on any day (including septic tank systems)
- EPA Code of Practice - Onsite Wastewater Management (891.4) July 2016
- Onsite Wastewater management plans risk assessment guide: final report (DELWP, 2022)
- Victorian Land Capability Assessment Framework (January 2014)
- VCAT Decisions & Precedents

National Standards

- Australian/New Zealand Standards and JAS-ANZ Certification

Council Strategic Plans

- Community Vision and Council Plan 2021 – 2025
- Public Health and Wellbeing Plan
- Loddon Mallee North Regional Growth Plan (2014)
- Small Town Future Development Plan

3.1 Roles and responsibilities

The management of onsite wastewater is the responsibility of variety of government organisations, private industry, and individuals at the state and local level.

Council

Under the *Environment Protection Act 2017*, Environment Protection Regulations 2021, and through the *EPA Code of Practice - Onsite Wastewater Management*, Council (in particular, Environmental Health, Planning and Building Services) is responsible for:

- Providing educational information and advice regarding onsite wastewater management to the community;
- Ensuring new residential subdivisions in unsewered areas, are provided with reticulated sewerage - or that the allotments are capable of treating and containing all domestic wastewater on site;
- Issuing permits to install or alter onsite wastewater management and issuing a certificate to use the OWMS;
- Refusing to issue a permit if the system does not hold a current Certificate of Conformance or if the site is unsuitable and/or the area available for the treatment and disposal of effluent is not sufficient;
- Ensuring that OWMS are operating correctly and that property owners comply with conditions on OWMS permits and certificates.

Land Capability Assessors

- Assess the capability of a site to sustainably manage wastewater within allotment boundaries or recommend if sewer is a viable option in preference to onsite wastewater management.
- Provide the assessment report, specifically aligned with the relevant legislations, standards and guidance.
- Identify a management program that should be in place to minimise the health and environmental impacts of ongoing onsite wastewater management.

Landowners and occupiers

A landowner's wastewater responsibilities consist of the following:

- Connecting to the mains sewerage system where it is available (in a declared sewer area) and the existing WTS does not meet EPA standards at the time the sewer (connection point) became available;
- In unsewered areas, obtaining a permit to install or alter an OWMS before a building permit is issued and any OWMS installation or alteration works commence; and
- Obtaining a certificate to use the system once installation has been completed and approved.

With regard to the on-going maintenance of an OWMS, it is the land occupier's responsibility to ensure that:

- The maintenance requirements of the OWMS are implemented, including de-sludging (every 3-8 years, depending on the system loading), and any specified monitoring conditions under the permit (including annual sampling);
- If the system type is a secondary treatment plant – it undergoes maintenance checks every 3 months by an accredited maintenance provider;

- The effluent disposal area remains clear from development, impermeable surfaces and unsuitable vegetation; and
- Copies of all maintenance, based on the type of system in use, is provided to Council in accordance with permit conditions.

OWMS Installers (Plumbers) and Maintenance Providers

OWMS Installers are responsible for:

- Ensuring that any plumbing work is either undertaken by a licensed plumber, or under the direct supervision of a licensed plumber;
- Only installing OWMS approved for installation in Victoria (with a current JAS-ANZ Certificate of Conformance); and
- Ensuring that all of the plumbing work complies with the Plumbing Regulations 2018 the Plumbing Code of Australia (Volume 3 of the National Construction Code) and any referenced Australian Standards relevant to the plumbing work undertaken; and issuing a compliance certificate for any plumbing work valued at \$750 or more.

Compliance certificates must be issued by licensed plumbers for specific plumbing work carried out in Victoria. A compliance certificate signed by a licensed plumber is a certification that their work complies with the prescribed plumbing standards.

A licensed plumber is not able to issue a certificate for plumbing work that has been carried out by someone else, except in limited circumstances.

OWMS Maintenance Providers are responsible for:

- Ensuring that they are an accredited maintenance service provider;
- Ensuring that any maintenance plumbing work requiring a compliance certificate is either undertaken by a licensed Plumber, or under the direct supervision of a licensed Plumber; and
- Ensuring that any wastewater pumped out of an OWMS as part of a maintenance service is only disposed of at a licensed facility.

Standards Australia and JAS-ANZ

Standards Australia develops internationally aligned Australian standards (AS) and participates in standards-related activities that deliver benefits nationally. Standards Australia and Standards New Zealand also work together to develop joint standards (AS/NZS).

Although Standards Australia develops and publishes different national standards, they are not responsible for enforcing, regulating or certifying compliance with those standards. The responsibility for system assessment and the evaluation of minimum performance requirements for OWMS sits exclusively with the accreditation authority JAS-ANZ (Joint Accreditation System of Australia and New Zealand) and is carried out by the accredited certification body; Global Certification Pty Ltd (GC) under the GC Domestic Wastewater Treatment Units (Septic Tanks) certification scheme. OWMS that pass the certification scheme are provided with a Certificate of Conformance. Only systems with a valid Certificate of Conformance can be installed in Victoria.

JAS-ANZ utilise the published joint Australian/New Zealand Standards for on-site domestic wastewater as the basis for the majority of the performance criteria applied to their certification scheme (for OWMS). For example, the current certification scheme for secondary treatment systems requires the different manufactured systems to have completed and passed a comprehensive testing program by 2020 based upon the requirements of AS/NZS 1546.3:2017 *On-site domestic wastewater treatment units: Part 3: Aerated wastewater treatment systems* to receive a Certificate of Conformance post 2020.

3.2 External regulatory stakeholder responsibilities

Other than the occupiers of dwellings with septic tank systems, other stakeholders have major responsibilities in relation to onsite wastewater.

Environment Protection Authority

The Environment Protection Authority (EPA) has the statutory responsibility of overseeing the management of domestic wastewater management in Victoria. The EPA sets the regulatory framework for wastewater and provides advice and guidance to support this framework.

The EPA's responsibilities in relation to the management of domestic wastewater disposal are as follows:

- Developing policies and legislation in relation to domestic wastewater disposal.
- Developing and reviewing the *Guideline for Onsite Wastewater Management* and other relevant publications.
- Approving the type of domestic wastewater treatment systems that can be installed in Victoria via the Australian Standards Certificate of Conformance process.
- Providing advice to local Councils where required.
 - Approval of systems discharging more than 5,000 litres on any day

Catchment Management Authorities (Mallee and North Central CMA)

The functions of catchment management authorities include the coordination of the preparation and implementation of regional catchment management strategies. Catchment Management Authorities (CMAs) are a referral authority under the Planning and Environment Act 1987 and also hold an approval role under the Water Act 1989 with respect to works on waterways.

Water Authorities (Lower Murray, Goulburn Murray Water and Grampians Wimmera Mallee)

Water and reticulated sewerage services across the municipality are provided by a number of water authorities. The water authorities have a lead role in the planning and implementation of appropriate infrastructure developments, such as the connection of urban areas to the reticulated sewerage system. Water Authorities provide comments to Councils on planning referrals in relation to their requirements. Rural Water Corporations provide water services comprising non-potable water supply, for irrigation and domestic and stock purposes.

The responsibilities of these authorities include:

- Managing the delivery of water to irrigation and water districts and maintaining the infrastructure;
- Implementing government regulations and policy for groundwater and surface water management, and;
- Harvesting storing and maintaining water in its reservoirs and dams.

Water authorities are also a referral agency for planning referrals for Onsite Wastewater Management Systems and assist Council with the implementation of setbacks from waterways. If an applicant is seeking a reduced setback from a waterway approval is sought from the Water authority prior to a septic tank permit being issued.

Department of Environment, Energy and Climate Action

The Department of Environment, Energy and Climate Action (DEECA formally known as DEWLP) is responsible for the management of Victoria's natural resources (water, land, etc.).

DEECA was also responsible for the management of the Country Towns Water Supply and Sewerage Program (CTWSSP). This State Government program was initiated in 2004 to:

- Introduce sewerage solutions to rural and regional towns that have critical public health and environment problems.
- Introduce new water supplies or upgrade existing water supplies.
- Identify sewerage needs to prevent future risks to public health and the environment.

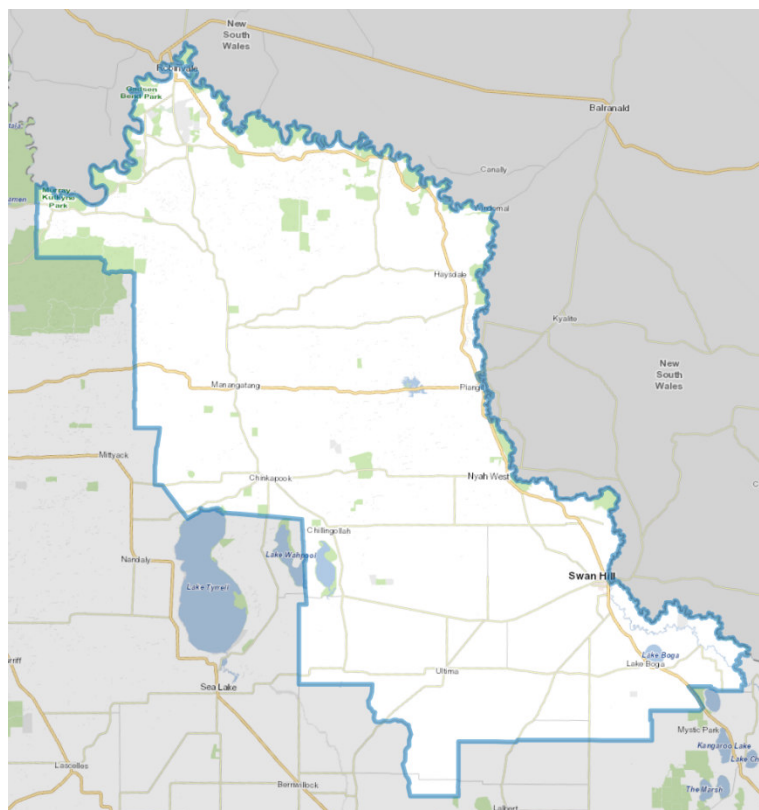
4. What We Know – Our onsite wastewater profile

Swan Hill Rural City Council, located in the north-west of Victoria, had a population of 21,381 at the 2021 Census and stretches over 6,100 square kilometres. Victoria in Future (2023) forecasts the municipality to reduce to 20,657 by 2031, with growth expected in the service centres of Swan Hill and Robinvale. Smaller townships such as Manangatang, Piangil and Ultima have seen significant population loss and consequently the loss of services and amenities in these locations.

Agriculture and manufacturing drive the economy. Our region's gross regional product in 2023 was \$1.772 billion. Agriculture accounts for almost 36.3 per cent of the region's total economic output, with more than 40 products grown commercially in the municipality. More than 20 per cent of all jobs in the municipality are directly related to agriculture.

Tourism and retail sectors are also strong. Approximately 574,900 tourists visit the municipality each year, injecting about \$71.9 million of added value into our local economy.

According to the Small Town Future Development Plan 2023, *'Housing in the regions small towns is characterised by large allotment and 1950's style dwellings. Larger townships such as Swan Hill, Robinvale and Lake Boga have a variety of newer builds and a mix of smaller allotment sizes. The delivery of new housing is an ongoing challenge for the region as service infrastructure including, water, sewage, power and communications are limited in most townships and therefore increase the overall build cost of new dwellings.'*



4.1 Population projections

The Swan Hill region which incorporates Swan Hill, Robinvale and Nyah West comprises just over 21,381 residents. The population is expected to have a small net decrease of 724 by 2031 according to Victoria in Future (2023).

Summary	2021	2026	2031	2036
Population	21,381	21,017	20,837	20,657
Population in private dwellings	21,011	20,624	20,421	20,186
Households	8,497	8,613	8,805	8,986
Average household size	2.5	2.4	2.3	2.2

Population has a direct impact on the density of onsite wastewater management systems within a township and on the economic viability of offsite wastewater management options, such as reticulated sewer. In the past this has meant that townships under 300 were not considered viable for sewerage systems.

It is also important to note that the age groups are relevant to wastewater as young children and ageing persons are more susceptible to illness from wastewater contamination.

Our 2021 population census statistics show that community members are 50.2 per cent male and 49.8 per cent female. We have a median age of 39 years. Almost 10,233 of the residents are employed and nearly 45 per cent of these individuals work in health care, agriculture, education or the retail industry.

The 2021 census data above also includes the moderate townships of Lake Boga (982 persons), Nyah West (673 persons), and Nyah (536 persons); along with five small townships consisting of Woorinen South (404 persons), Manangatang (274 persons), Piangil (230 persons), Ultima (173 persons), and Boundary Bend (154).

Since 2016 each of these townships have experienced small amounts of growth and decline, with population growth experienced in Woorinen South (+48), Boundary Bend (+22), Nyah West (+10) and Nyah (+6). The largest concentrations of population decline across the five-year period was experienced in Manangatang (-35) and Piangil (-29), in addition to smaller declines in Lake Boga (-3) and Ultima (-1).

The small decline in population in these townships could be attributed to residents relocating within the Region to moderate townships, such as Nyah West and Nyah, or relocating outside of the Region entirely to larger townships due to employment and housing opportunities.

4.2 What we know about our wastewater

Wastewater may be treated and disposed of by either **onsite** or **offsite** systems. These systems provide different levels of wastewater treatment and management across the municipality.

Larger townships of Swan Hill and Robinvale are serviced with reticulated sewerage (offsite system) which is provided and managed by Lower Murray Water. There are also three smaller townships partially serviced with reticulated sewer: Lake Boga, Nyah and Nyah West. The remainder of the municipality is unsewered and relies on onsite wastewater treatment systems.

The type of onsite (septic tank) wastewater management system approved for a particular area or township is dependent upon the local conditions. Each township within Swan Hill Rural City Council is uniquely placed within the environment. This means that each will have different conditions (soil types, weather, local vegetation, water sources) that will positively or negatively affect the ability to maintain adequate onsite wastewater management.

Most townships were created many years ago without a coordinated long-term township plan. Properties were subdivided to create small lot sizes that were not required to treat and retain all wastewater within the

property boundaries. Subsequent legislative amendments require all new developments to adequately treat wastewater onsite.

Existing township structures (allotment pattern), increasing population, changing water use patterns and the existence of ageing septic tank system have created adverse conditions and amenity within some townships and areas.

4.3 What are the challenges

Historically the management of onsite wastewater systems within the Swan Hill Rural City Council has been challenging. Local Councils are the regulatory authority for Onsite Wastewater Management and have been limited by time and financial support to implement effective OWMPs actions. Council has mainly focused on an approval scheme for new systems and a basic system monitoring program, as time permits.

Records of installations prior to Council amalgamations in 1994 are almost non-existent and until such time that older properties are renovated or redeveloped Council is unaware of what Onsite Wastewater Management Systems are in place. Many of the older properties systems are found to be no longer compliant as they have separate black water and grey water systems, majority of which need upgrading to new compliant systems.

It is recognised that many existing septic systems within the area are several decades old and/or are located on properties/parcels that may be unsuitable for Onsite Wastewater Management. Existing systems may be undersized or have direct greywater discharge off-lot, in most cases approved by Council at the time they were installed. These systems can have an adverse impact on public amenity, and these may cause a nuisance. Some septic tank systems can also cause pollution from effluent discharges into waterways downstream. The number of installations that are discharging off-site (whether with or without approval) is currently unknown.

While it is now clear that such practices are no longer appropriate and may be creating unacceptable risks, it is acknowledged that many of these problems will take time to rectify. There are financial implications for owners who have a failing septic system and are required to complete upgrade works. New systems can be expensive, and some owners may not have the finances to undertake works immediately, resulting in continuing system failures. It is therefore difficult for Council to implement an adequate compliance regime unless there is an obvious breach resulting in visible off-site discharge of effluent.

There are also limited cost recovery options for Council to monitor increasingly complex and larger numbers of systems as the peri-urban areas. With this in mind, there is increasing pressure on all Councils within Victoria to improve Onsite Wastewater Management so that existing and future development does not have an impact on public health and the environment.

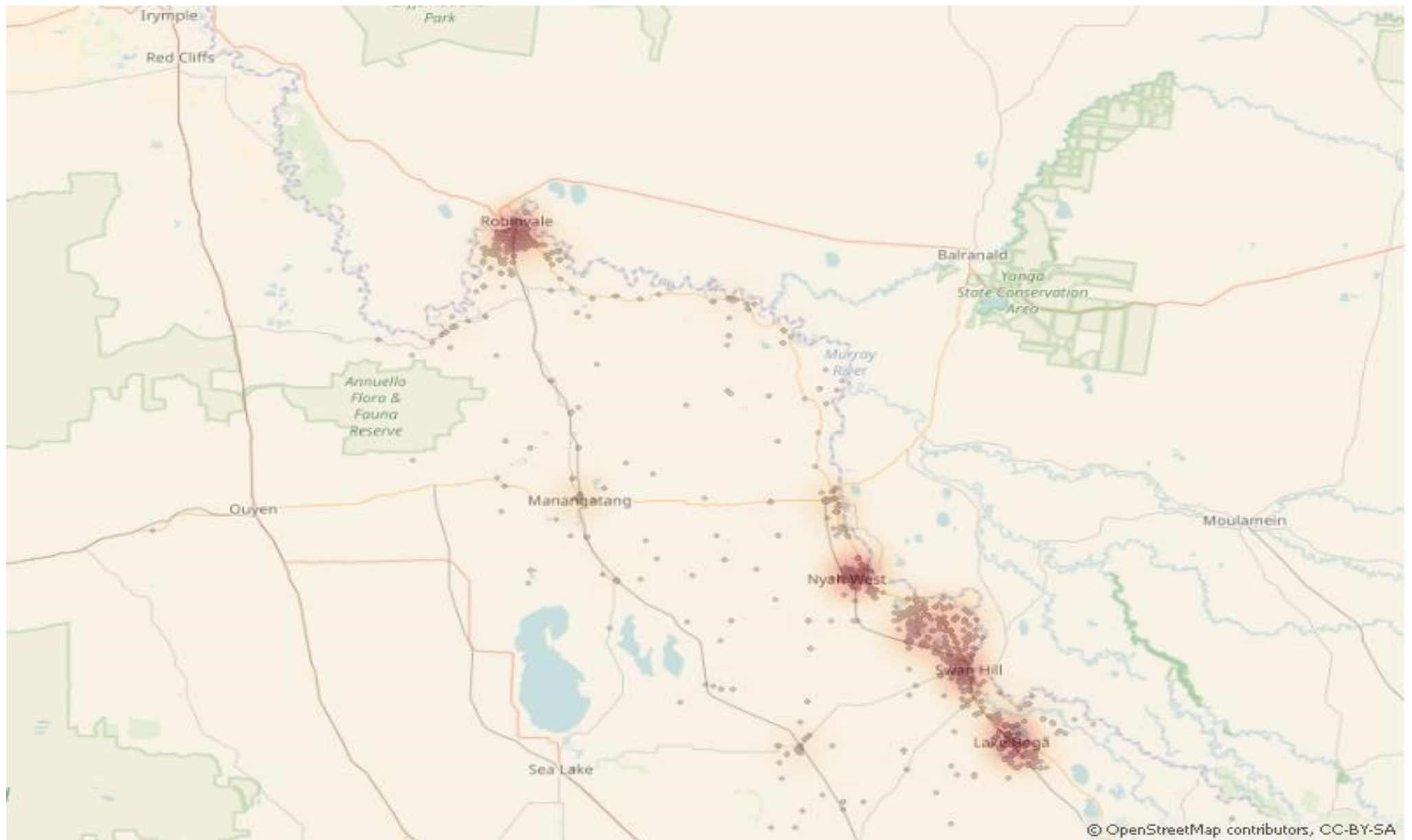
4.4 Distribution of septic tanks

There is large proportion of unsewered area encompassing some of the moderate and small townships within the municipality. According to Councils database there are around 4,000 recorded septic tank systems within the municipality. The age of these tanks' ranges from 1960's – 2024. Of these systems, over 50% are older than 20 years based on permits issued annually and available age profiles with the majority of systems being the conventional type i.e. having sub-surface disposal.

Data from 2001 are able to identify the number of installations and alterations by wastewater system type. The table below highlights townships that have 15 or more septic tanks installed. Any townships under 15 have not been included as it is not certain that the data is correct.

The following heat map provides an overview of the septic tanks systems installed within the municipality from 1960 – 2024 (March). The heat map provides a visual representation of areas of high concentration of septic tank systems and the proximity to waterways within the municipality.

Township	SYSTEM TYPE	
	Conventional system	WWTP
Bannerton	21	1
Beverford	86	4
Boundary Bend	90	0
Castle Donnington	86	3
Chinkapook	15	
Lake Boga	283	22
Lake Powell	17	1
Manangatang	170	7
Murrawee	40	2
Murraydale	28	10
Narrung	21	
Nyah	193	1
Nyah West	95	
Pental Island	53	3
Piangil	163	5
Robinvale	656	34
Swan Hill	343	77
Tol Tol	73	4
Tresco	99	3
Tyntynder	249	11
Ultima	104	2
Vinifera	58	
Wemen	67	1
Wood Wood	42	
Woorinen	123	5
Woorinen Nth	18	2
Woorinen South	131	10



5. Priority towns

From the collective data analysed and the previous DWMP, there are four townships that are considered priority towns of focus. These priority towns have experienced development on smaller allotments and therefore have a higher density of systems that can create potential wastewater issues.

Council would need to undertake further household surveys to identify what type of systems are installed and if there are any signs of failure.

5.1 Priority areas

Further analysis was undertaken of the data to determine the priority towns for this DWMP. A priority rating was given to towns with the following features:

- Age of septic tank system.
- Allotment sizes
- Geography of township

The priority areas identified include:

Location	No of properties	Allotments <1,000m ² or >1000m ²	Age of Septic tanks	Town characteristics	Public health concerns
Manangatang	273	30% of properties are smaller than 1000m ²	1960s – present	The township is in a natural basin with soil characteristics that are not favourable to wastewater.	Large number of smaller allotments, poor soil types and houses within close proximity could result in wastewater nuisances that could have an impact on neighbouring properties and health.
Boundary Bend	45	20% of properties are smaller than 1000m ²	1970s – present	The township is located along the Murray River including many of the houses. Large agricultural industries in town.	With a fluctuating population (seasonal), the age and size of the systems may not be able to cope with use over a long period of time which could result in failing systems and potential spread of disease.
Woorinen South	156	10% of properties are smaller than 1000m ²	1960s – present	The township is located close to a Natural reserve, which can be indicative of poor soil types. Allotments are dependent on Domestic Wastewater treatment. Most of the allotments within the township are small. Development within this area is consistent.	Poor soils and aging septic tank systems could lead to potential septic tank failure.
Piangil	77	10% of properties are smaller than 1000m ²	1960s – present	The township is located within 800m of the Murray River. Smaller ¼ acre blocks left to develop. Under current guidelines would not be suitable for Domestic Wastewater Treatment.	With 50% of current septic tanks are over 30 years old there is a concern that there could result in failures and potential spread of disease.

Currently Council is reliant on older data (circa 2005 – 2008) that have been used to derive the priority areas. As this review has identified, it is imperative that Council undertake surveys within these priority areas to gain a better understanding of the overall wastewater profile for these townships and also the scale of offsite discharge and the impacts this could be having on the receiving environment. Additional funding would be required to complete a survey of these townships and collate the data collected.

6. How we improve

Wastewater management improvements are vital for the long-term health and prosperity of townships. Using wastewater (septic) systems beyond their design life increases the risks to public health and the environment and needs to be managed effectively.

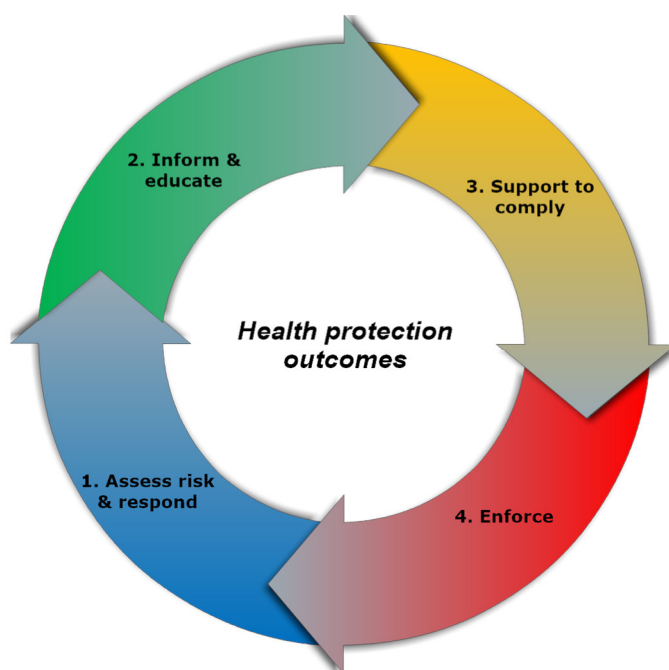
Not all systems or townships are designed to perform equally, nor are all environments equally sensitive to wastewater discharge. A risk-based approach is taken to ensure that Council is conducting its wastewater management activities efficiently and effectively. This approach also provides Council with the direction to seek wider wastewater management improvements, such as sewer, and the funding that is needed to implement such improvements. The goal is to reduce risks to public health and the environment to an acceptable level over a period of time within available Council resources.

Wastewater management involves a range of issues, including those that currently exist or have the potential to exist. Each issue is very particular in its characteristics and therefore the methods to resolve them must be flexible yet specific.

Improvement options for wastewater management fall into two general categories; onsite wastewater (septic tank) systems and sewer schemes. In some cases, these are combined, such as common effluent systems, to provide greater variety of opportunity for water use and reuse by residents.

To improve wastewater management, strategies are required that address strategic planning and infrastructure, information, regulation, compliance and education and community consultation.

Council's approach to wastewater compliance management will consist of four sequential stages: assess risk & monitor; inform & educate; support to comply; and enforce. These stages will be required to address the range of existing and potential issues across the municipality.



6.1 Risk Assessment

A primary objective of the OWMP is to identify and implement strategies aimed at minimising the impact of existing or potential risks to human health and the environment. All wastewater generation and/or discharge is seen to be a risk with potential harm to human health or damage to the environment. Wastewater risks that need to be considered, their cause and key impacts are described in the following table.

Risk	Cause	Key Impacts
Failed systems with offsite discharge	- Damaged effluent disposal drains/trenches. - Increased loading from extensions to dwellings - Design criteria not complied with - Faulty installation - New works & activities impacting on disposal area. - Age of the system - Septic tank full - Poor maintenance	- Nutrients - Pathogens - Odour - Visual amenity - Oxygen depleting material - Local land degradation - Pollution of water courses - Pooling of effluent causing mosquito breeding
Treated off-site effluent discharge	Permitted system	- Pollution of water courses - Local visual amenity - Demand on Council drainage infrastructure
Treated on-site effluent discharge	Permitted system	- Local visual amenity - Pollution of groundwater
Untreated off-site sullage (grey water) discharge	- Poorly maintained system with sand filter not functioning. - Sand filter bypassed to stormwater. - Septic tank full - Permitted system	- Nutrients - Pathogens - Odour - Visual amenity - Oxygen depleting material - Local land degradation - Pollution of water courses - Demand on Council drainage infrastructure
Ineffective regulation	- Failure to comply with permit conditions. - Ineffective database - Non-connection to sewer - Unclear regulatory responsibilities	- Liability - Increased incidence of preventable pollution and environmental degradation - Increased risk to public health
Re-use of wastewater	- Allowed re-use. - Low water supply - Poor management by individual residents	- Pathogens - Odours

These risks have been identified by incorporating information from:

- literature reviews
- a review of complaints
- current Council data
- discussions with Council staff, and
- field inspections.

6.2 Risk Management Approach

An OWMP risk assessment methodology has been developed for councils to assess the risk of OWMS at a sub catchment and catchment level, published by DELWP, 2022.

The guide outlines the following objectives to be considered when assessing risks associated with OWMS:

- Onsite wastewater systems and their effluent are appropriately located and managed through a consistent risk assessment process.
- Human health and environmental risks are minimized, particularly for potable water supply and environmentally sensitive areas.

The methodology of the guide is in alignment with ISO 31000 Risk Management and includes risk identification, risk analysis and risk evaluation and treatment.

Using the guide Council will develop a risk management plan to inform ongoing monitoring of OWMS throughout the municipality, particularly in areas where reticulated sewer is not a viable option for wastewater management.

The risk management plan will be developed by using the following six steps of the risk assessment structure:

1. Initiation:

- Determine sub catchments and catchment areas for assessment, identify endpoints.

2. Risk Identification:

- Collect data and allocate data to risk band levels for each risk factor.

3. Calculate consequence.

- Determine consequence through calculation of contaminant loads from risk factor data.

4. Likelihood assessment

- Determine likelihood for each risk pathway. Calculate likelihood from risk factor band level data.

5. Risk analysis

- Calculate risk rating for each sub catchment risk type and pathway.

6. Cumulative risk

- Calculate risk rating for specific endpoints and review results.

After the risk treatment plan is developed (within the life of this 2025-2030 plan), options of more complexity such as delivering a program of monitoring inspections and liaison with property owners will have delivery plans developed to manage the detailed nature of implementation.

Regular monitoring and review of the risk treatment plans, including track implementation of the delivery plans will be planned and budgeted for, and then will be undertaken. This will include the stakeholder engagement and reporting of implementation progress as required as part of the ongoing development of Council's OWMP.

6.3 Township Risks

A wide variety of risks exist in each township, requiring action to remove or reduce them. The magnitude of risk posed by threats is dependent on the individual characteristics of each township. These include, the size of the threats, significance of the local environment, quality of the storm water infrastructure, exposure of threats to the public and availability of threat reduction measures, for example setback distances.

The level of information gathered, analysed and understood at any particular time affects the level of risk posed by wastewater management in each township. Since 2007, significant changes in the information available to Council and legislative interpretation have occurred.

Each township is likely to have an area posing a high risk to public health or the environment. Generally, high-risk areas will have one or more of the following characteristics:

- properties less than 1000 square metres (particularly in towns with very low or high soil percolation rates);

- more than five older toilet only systems with grey water discharges to the storm water catchment;
- high levels of faecal bacteria and/or nutrients identified in nearby storm water drains or groundwater;
- high likelihood of human contact with contaminated storm water, groundwater or waterways e.g. open drains and groundwater bore use;
- environmentally significant vegetation in the area;
- undersized storm water infrastructure unable to cope with anticipated increase in flow rates and regular contamination by domestic wastewater;
- steep grades prone to instability exacerbated by high rainfall, moving ground water springs and high wastewater loading; or
- inadequate and failing wastewater infrastructure.

Township Land Capability Assessments should be developed and may then be used to provide detailed investigation in areas of excessive risk to determine the limiting risk factors and appropriate design standards for onsite wastewater treatment systems.

In identified high risk areas, investigative sampling of storm water and/or ground waters may be used to monitor impacts of wastewater disposal in the area.

Swan Hill Rural City Council does not currently have *Township Land Capability Assessments* in place but would seek funding to complete this project if the opportunity arises.

6.4 Identified risks

Risk identification and prioritization for this plan combines previous Domestic Wastewater Management Plans (now called Onsite Wastewater Management Plans) and Environmental Health team local knowledge. The data was also assessed by analysing the EPA risk assessment tool and a review of our current data management practices.

A few of the risks identified in this plan are carried over from the previous Domestic Wastewater Management Plan, with the risks requiring State government funding and resourcing to resolve and/or reduce the impacts of the risks. Some of the risks identified, such as historically small housing lots, are very difficult to resolve and management of these risks is the preferred outcome.

Moving forward, the Environmental Health team will continue to its current resources to the areas where the most significant impacts can be made.

Identified risk - Missing and incomplete data

Councils Wastewater Data Management System is contained within an online records management system that holds records dating back until 2009. There is a previous records management system that only one officer can access that has some records dating from 1960s - 2008. All records prior to these dates are not held by Council.

The missing incomplete data sources pose a risk to the environment and homeowners because there is no information on what types of systems were installed, where they are located and if they are still managing wastewater effectively and not impacting the environment.

Officers are unable to proactively inspect existing systems due to staff capacity. Ongoing compliance is managed through complaints received about potentially failing or non-compliant systems as well as through planning referrals for extensions to homes or subdivisions of properties. Proactive routine inspections of existing systems would be costly to Council given that there are over 4,000 systems installed throughout the municipality, and many older systems that may not have permits on record.

Strategies and outcomes for the next five years will continue to prioritise and address these issues, working towards a more complete record of active systems across the municipality, including ongoing retrospective recording of legacy and ageing systems that are not currently include in Council records.

Basic monitoring, including reviewing secondary treatment system maintenance reports and following up with homeowners and plumbers that any issues have been resolved will continue to be undertaken by Environmental Health Officers.

Identified risk – Townships with historically small housing lots

Historic small lot subdivisions in rural townships including Manangatang, Boundary Bend, Piangil and Woorinen South, pose an environmental and future development risk to these communities. Currently there are a number of blocks under 1000m² that Council does not have any data on their wastewater systems, and they are unlikely to be able to meet current standards. These small lot sizes and aging wastewater systems pose a potential risk to the environment in wastewater systems leaching into the surrounding lands and waterways.

The allotment sizes in these towns, including the currently undeveloped land blocks, are well below the 4000m² for unsewered lots specified in the current Low Density Residential Zone criteria outlined in the planning scheme requirements. These small lot sizes make it almost impossible for current and potential landowners to meet the wastewater requirements to develop this land for increased housing. These small lot sizes require potential landowners to purchase more than one block and consolidate the titles so that they are able to build their new homes in these towns.

Council does not intend to undertake a compliance-based approach to resolving these small lot issues. Instead, Environmental Health and Planning Officers will continue to collect data, respond to complaints and issues of concern with failing wastewater systems and problem-solve with landowners to transition to the most efficient and effective wastewater management system that will work on their land.

Funding for developing the previously mentioned *Township Land Capability Assessments* will be sought if the opportunity arises to improve our data in these areas and seek to find innovative solutions that meet the current legislation.

Identified Risk – Lack of Community Understanding of Onsite Wastewater Management obligations and risks

A lack of education and understanding how to management Onsite Wastewater Management system remains a risk to water quality, the natural environment, and public health.

Residents with newly installed wastewater management systems are provided education by Council and their installing plumber on how their system works and the importance of managing their wastewater management system to ensure it works effectively and efficiently.

Once these properties are sold, that information is rarely passed on to the new owners and the systems may not be operated or maintained in the correct manner; particularly if the new owners have never lived on a property with an onsite wastewater management system in the past.

Some residents may not be aware that their property relies on an onsite wastewater management system, where it is located, or how the system works. This lack of awareness can lead to safety issues, as well contribute to system failures due to lack of maintenance, overloading, or lack of early detection of poor functioning.

New residents may not be aware of permit conditions, where to access appropriate information relating to their system, or who to contact should issues arise.

This poses a challenge as many landowners are unaware of their obligations in relation to onsite wastewater management and the newly introduced EPA General Environmental Duty.

For this reason, education and community awareness needs to remain an area of focus for the next five years of this plan, with a focus on transitioning messaging to newer delivery formats, utilising resources developed by other councils, government, and the Environment Protection Authority, as well as leveraging improved management of property data.

7.0 Management focus areas

The focus area for Council's management of onsite wastewater is informed by several main factors, including Council's statutory duty and key stakeholder strategic priorities (LMW, EPA & DEECA). Council's management strategies for wastewater continue to be informed by three factors:

1. Council's statutory duty
2. Council's capacity to undertake wastewater management services
3. The risks posed by ineffective septic tanks systems

Council's capacity to undertake wastewater management programs, along with the community's engagement feedback and the risks posed by ineffective and non-compliant OWMS together determine the plan's objectives.

7.1 Focus Areas

The **OWMP 4 focus areas**:

1. Information Management
2. Education and Awareness
3. Regulatory Management
4. Collaboration and Review

A summary description of the 4 focus areas and their objectives follows.

7.1.1 Information Management

The effectiveness of the OWMP will be measured by a comprehensive information and data collection that will enhance monitoring and reporting processes.

Ensuring that all new installations and alterations to existing systems are compliant is a more efficient way of managing the risks associated with wastewater. All new applications, planning referrals and complaints are assessed against current legislation and landowners are provided details of what they are required to do in order to ensure the system is compliant.

Information and data collation is a critical primary phase of the Action Plan that must be completed before effective risk-based interventions can be undertaken. The quality and extent of the information Council holds for individual wastewater treatment systems (OWMS) directly influences the quality and extent to which subsequent actions can be conducted.

Information and data collation objectives:

- Create or develop a solution to capture appropriate septic tank system data that is easily accessible for reporting purposes and to improve processes, efficiently target resources and assist strategic wastewater planning.
- Collation and auditing of all current and historic OWMS information into a single information management system to identify information gaps, provide status reports, improve risk assessment data and accuracy of information on OWMS currently operating within the municipality.

7.1.2 Education and Awareness

To ensure systems are being installed in accordance with the relevant legislation and Australian Standards, communication and education for the community should be a key priority. The development of a suite of septic tank management information for landowners (website, newsletter, pamphlets) highlighting ownership responsibilities regarding Onsite Wastewater Management Systems may reduce the number of failing systems and minimise the impact to health and wellbeing and the environment.

Conducting targeted education and awareness programs will contribute toward the objectives of the Action Plan and provide a solid foundation for increasing community and industry awareness levels around wastewater responsibilities and requirements; and subsequent compliance and monitoring activities.

Education and awareness objectives:

- Implementation of an effective and comprehensive wastewater education and information strategies for OWMS owners
- Provide fair, accurate and accessible information on good wastewater management principles, practices and improvement options.

7.1.3 Regulatory Management

Council has several statutory responsibilities relating to wastewater control under a number of different Victorian Acts, including the:

- *Environment Protection Act 2017*; the
- *Building Act 1993*; and the
- *Planning & Environment Act 1987*

These responsibilities include activities such as:

- Ensuring that approved planning permits contain the necessary wastewater conditions for unsewered and sewerer developments
- Ensuring that OWMS Permits contain all the necessary wastewater conditions for the land-based constraints of the installation site and the type of system being installed.
- Approval of new OWMS installations and alterations of existing systems
- Monitoring the maintenance reporting requirements for different systems
- Building Act “Consent to Use” requirements
- Addressing wastewater non-compliances and complaints

There will always be a requirement for Council to undertake regulation or enforcement activities in relation to different wastewater issues and non-compliances that pose an immediate risk/threat to the environment or human health. This is an integral part of Council’s statutory responsibility.

However, Council’s enforcement policy is generally based on the premise that enforcement is the last tool employed when education and mutual co-operation on a compliance issue has not been successful. The exception to this, is when a wastewater non-compliance poses an unacceptable immediate threat to human health and safety, and it is necessary to employ an enforcement measure from the outset to address it.

The recent introduction of the new *Environment Protection Act 2017* and *Environment Protection Regulations 2021* have established the ability for Council to enforce maintenance of OWMS to both owners and or occupiers (i.e. rental tenants), via infringements, Notices and if required Prosecution. Council’s regulation and enforcement is guided by the EPA Publication 1974: Regulating onsite wastewater management systems: local government toolkit. The toolkit clearly provides the legislative requirements of owners and operators of OWMS under the GED and Council’s investigative and enforcement processes to follow.

The review of operational policies and procedures to ensure that Council has a consistent and transparent way of approaching all new installations and ensuring they are all in compliance with the legislation. These guiding documents will provide officers with workflows to approve systems and set out specific requirements relating to land size, capability and overlays. This will ensure that a consistent approach is taken and that all decisions made by Council officers are supported by approved organisational policies.

Regulation and Enforcement Objectives:

- To influence the regulatory framework in which Council must operate to manage wastewater and develop Council policy and procedures utilising available tools.
- To ensure all unsewered site developments are capable of adequately treating and containing all effluent on site prior to planning approval
- To investigate and enforce correct operation and maintenance, where required

7.1.4 Strategic Management, Collaboration and Review

Council's other strategic documents will need to be considered to ensure that they reference this Onsite Wastewater Management Plan and relevant legislation, where appropriate. This will provide currency to the new plan and ensure that consideration needs to be made to onsite wastewater management at a Strategic level.

To maximize the impact of the different actions and projects identified in the OWMP Action Plan, there must be integration and co-ordination of Council's internal resources. Internal collaboration is a key component to achieving the successful implementation of the OWMP.

Likewise, external collaboration and consultation is also a critical factor, specifically required under *SEPP (Waters)*, in the development of the OWMP and its subsequent implementation. Strengthening relationships with key external partners and stakeholder agencies such as LMW, the EPA, MAV and EHPA is a fundamental element in improving the level of collaboration, consultation, information and resource sharing between agencies.

Community engagement and collaboration is recognised as a foundational component of this plan development. A number of the strategies and actions within the plan rely on community being engaged with the Onsite Wastewater Management Plan, especially any advocacy for township sewerage systems.

Council also recognises the importance of engagement and collaboration with our local Plumbers and Land Capability Assessors in the development and successful implementation of this plan.

This Onsite Wastewater Management Plan will also be required to be reviewed on an annual basis as well as at the end of the life of the plan. This will ensure that all actions are being addressed and completed within the allocated timeframes.

Collaboration and Review objectives:

- Regular review of plan as per legislative requirements.
- Advocate for and contribute to reform of the wastewater legislative framework.
- Consult and work in collaboration with stakeholders and the community.

7.Action and Management Plan

Swan Hill Rural City Council actively promotes responsible environmental management practices. By repairing and adopting the Onsite Wastewater Management Plan (OWMP), Swan Hill Rural City Council demonstrates its commitment to improve the management of domestic wastewater within the municipality.

The successful implementation of the OWMP Action Plan can largely be contained within the existing Environmental Health budget and allocation of resources, along with some cross organisation development of solutions; such as improved use of technology to achieve greater compliance. External funding will also be sought, including grants, from State and Federal governments if available.

The following is Council's Onsite Wastewater Management Action Plan for the 2025-2030 period.

Focus Area 1: Information Management

Capture appropriate septic tank system data that is easily accessible for reporting purposes and to improve processes, efficiently target resources and assist strategic wastewater planning.

Strategies	Actions	Outcomes
1. Improve the quality and quantity of wastewater related information captured.	a) Input all data from records & STEM system	- Improved data and storage of data within central database - Improved access to information to assist strategic planning for townships - Improved reporting - Improved availability of data for decision making - Identification of exact location of septic tank systems using GPS technology
	b) Validation (data cleansing) of inputted data	
	c) Integrate system with council's GIS - Inputting of all available recorded data - Inputting of specialised data – sewer maps, connections, HEAT Map data	
	d) Devise a strategy for the ongoing collection of system service data from service providers and input	
2. Develop risk prioritisation plan	e) Utilise the onsite wastewater risk assessment guidance tool developed by DWELP 2022 to review risk data profiles for each priority town	- Improved risk data for strategic planning and decision making - Design standards can be developed for high-risk townships - Inappropriate developments refused
	f) Investigate funding opportunities to develop <i>Township Land Capability Assessments</i>	
	g) Conduct a septic tank system survey in a priority town to assist with risk assessment <i>Note: Subject to funding</i>	

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|--|---|--|
| | h) Conduct surveys of local surface water conditions in priority towns to assist with risk assessment <i>Note: Subject to funding</i> | |
|--|---|--|

Focus Area 2: Education and Awareness

Provide fair, accurate and accessible information on good wastewater management principles, practices and improvement options

Strategies	Actions	Outcomes
1. Raise profile of wastewater system operation and maintenance requirements within the municipality and region	a) Implement targeted education campaigns to property owners, occupiers and agents in high-risk areas (once identified after Risk assessments are completed)	- Improved access to information and raised community awareness - Risks to health and environment from poor management is reduced - Improved understanding of the management of onsite wastewater systems
	b) Provide informative and accessible wastewater manager information in hard copy and on Council's website	
	c) Develop an ongoing community education program	

Focus Area 3: Regulatory Management

To influence the regulatory framework in which Council must operate to manage wastewater and develop Council policy and procedures utilising available tools in conjunction with a comprehensive program of education, facilitation and enforcement process to prevent onsite public health and environmental risks.

Strategies	Actions	Outcomes
1. Ensure Council wastewater policy is supported by evidence-based investigation and completed township risk assessments	a) Where appropriate standardise guidelines and processes with neighbouring Councils and water authorities	• Better coordination of policy and legislation to protect public health • Improved understanding of high-risk areas and best practice wastewater management • Improved capability to implement wastewater management initiatives • Improved information for decision making and educational activities
	b) Review council policies on permit conditions for installations and alterations in high and low risk areas: • land capability assessments • grey water re-use • new developments • application fees and ongoing monitoring fees	
	c) Review operating policies and procedures for septic tank system and greywater re-use applications (installation, use and alterations)	
	d) Review operating policies and procedures for septic tank & grey water system monitoring/auditing program including data entry	
	e) Explore and review data from other councils and water authorities on how to overcome challenges with townships that have small lot sizes and onsite wastewater management	
2. Establish an audit and enforcement program to ensure that property	f) Establish a media campaign reminding owners of required annual service contracts or 3 yearly desludging of primary systems	• Property owners comply with wastewater responsibilities • Increased confidence in quality and accuracy of service reports

owners and service technicians adequately fulfill their respective responsibilities

- g) Develop clear guidelines to assist property owners to understand and comply with their legal responsibilities for monitoring and maintenance of wastewater systems

- Improved data on performance of treatments systems and disposal fields

Focus Area 4: Collaboration and Review

Strategies	Actions	Outcomes
1. Provide regular opportunities to improve community and stakeholder understanding and support improved wastewater programs and projects	a) Conduct consultations with appropriate internal and external stakeholders on draft policies	• Communities engaged in wastewater management and improvement processes with key agencies • Stakeholders engaged in improvement projects with Council • Improved relationships and willingness for agencies to work together to develop solutions at a municipal and regional level
	b) Investigate possibility of joint application management protocols with council's planners	
	c) Liaise with local water authorities and communities to progress community sewerage, where appropriate	
	d) Collaborate with EPA, Water Authorities, CMAs and other interested stakeholders to achieve shared goals	
2. Regular review of plan as per legislative requirements	e) Conduct an evaluation of OWMP including: • Data management and reports • Effectiveness of community engagement strategy • Results of monitoring/auditing program • Review risk assessments • Implementation of policies and procedures	• Regular reporting to Council on OWMP strategies

	f) Draft a report on the evaluation of the OWMP and recommendations	
3. Advocate for funding opportunities	g) Investigate and advocate for funding opportunities to connect reticulated sewerage in priority towns	• Raise the profile of small priority towns and the need for connection to the reticulated sewerage system • Ability to complete actions listed within the OWMP and Action Plan that are subject to funding
	h) Explore and advocate for funding opportunities to complete works listed within this action plan, including township surveys, data cleansing and township land capability assessments.	

