Mill Stream Environment Management Plan (EMP) Annual Compliance Report

Report Number 2

Period 1 January 2025 to 31 December 2025
In Compliance with
Authorisation Number 01/2024

Sydney WATER
Water IS OUR LIFE



Acknowledgement of Country

Sydney Water respectfully acknowledges the Traditional Custodians of the land and waters on which we work, live and learn. We pay respect to Elders past and present.

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1 Executive Summary

Sydney Water received a new Authorisation on 7 June 2024 to operate Emergency Relief Structures (ERSs) located on Sydney Airport land that discharge to Mill Stream. The previous Authorisation expired on 31 March 2024. This report provides the second annual update on Sydney Water's performance against the conditions of the Authorisation and implementation of the Environment Management Plan (EMP) during the reporting period 1 January 2025 to 31 December 2025, as approved by the Airport Environment Officer (AEO).

Sydney Water has continued to work collaboratively with key stakeholders, including Sydney Airport, Bayside Council, the NSW Environment Protection Authority (EPA), the Department of Infrastructure, Transport, Regional Development, Communications, Sports and the Arts (DITRDCSA), and the Port Authority of NSW, to progress EMP actions and support regulatory compliance.

As detailed in this report, Sydney Water's performance has been strong, however one condition in the Authorisation remains non-compliant due to access, legal and technical constraints, which are being worked through as a priority. This is the Botany Low Level Carrier Delivery Project, for which the revised due date is March 2027. Sydney Water is otherwise compliant with all reporting, monitoring, notification and stakeholder engagement requirements and continues to implement operational and strategic improvements to the Mill Stream system.

Comparison with the Previous Annual EMP Compliance Report

The previous Annual EMP Compliance Report (Report No.1) covered the period 7 June 2024 to 17 January 2025 and represented the first reporting cycle under the new Authorisation. During that initial period, Sydney Water was largely compliant; however, several actions were in early stages of delivery, and some timeframes were affected by access constraints, approval processes and operational dependencies associated with the airport environment. Minor timing issues were also identified, including a delayed quarterly report submission to Sydney Airport and partial achievement of grit pit cleaning shift targets.

In contrast, this second reporting period demonstrates a maturing compliance position and improved delivery certainty. All monthly and quarterly reports were submitted within the required twenty-one-day timeframe, supported by improved data validation processes and clarified reporting schedules. Operational access arrangements at Sydney Airport have stabilised, enabling more consistent delivery of grit pit maintenance activities and improved coordination of desilting works. Stakeholder engagement has also strengthened, with regular Stakeholder Reference Group (SRG) meetings, supported by Hydraulic Improvement Leadership Group (HILG) input, and targeted briefings supporting transparency and shared understanding of system performance and constraints.

System Performance and Environmental Outcomes

At the commencement of the Authorisation period, Mill Stream overflows averaged 19 events per year with an annual volume of approximately 3,094 ML. Through a combination of operational optimisation, pump setting adjustments, desilting of SWSOOS1, and improved flow balancing between SWSOOS barrels, Sydney Water achieved a reduction to a modelled performance of 13 events and 1,238 ML per year which is still current for modelled performance for 2025

For the current reporting period (1 January 2025 to 31 December 2025), the Mill Stream ERS discharged 2,385 ML of diluted wastewater across 23 wet weather overflow events, with no dry weather discharges recorded. The

majority of overflow activity occurred during periods of severe rainfall in July, August and September 2025, where stormwater inflows exceeded system capacity. Sydney Water responded to all overflow events in accordance with EMP requirements, undertaking thirty-eight inspections and eight environmental clean-ups, removing approximately 152 m^3 of gross pollutants from Mill Stream and Foreshore Beach.

Compliance Obligations and Summary of Compliance

Sydney Water's compliance obligations under the Authorisation and EMP include, but are not limited to:

- Submission of Annual EMP Compliance Reports and Quarterly Reports within approved timeframes
- Monthly monitoring and reporting of overflow frequency, duration and volume
- Timely notification of overflow events and incidents of material harm
- Implementation of EMP actions across all seven objectives, including desilting, source control, grit pit maintenance, hydraulic investigations, and public health protection measures
- Water quality, air quality and dry-weather sewer performance monitoring
- Complaint investigation and resolution
- Stakeholder engagement through SRG meetings, HILG forums and community updates
- Compliance with additional Authorisation conditions, including bird strike risk management, IPART submissions, and reporting to Sydney Airport

For the current reporting period, Sydney Water has met most applicable compliance obligations. Only one non-compliance had been identified. Where EMP actions extend beyond the reporting period due to their scale or dependency on external approvals, these have been transparently documented, and delivery pathways remain active and endorsed by regulators.

Overall Compliance Position

This second Annual EMP Compliance Report demonstrates continued improvement in both environmental performance and regulatory compliance at Mill Stream. Compared with the previous reporting period, Sydney Water has strengthened its compliance assurance processes, improved reporting timeliness, and advanced delivery of key operational and strategic initiatives. Sydney Water remains committed to implementing the EMP in full and to working collaboratively with regulators, stakeholders and the community to further reduce overflow frequency and volume and protect the Mill Stream environment.

2 Introduction

2.1 Context

Sydney Water owns and operates the Malabar Sewage Treatment System, servicing nearly 1.8 million people. The system carries wastewater from as far as Campbelltown in the southwest, Fairfield and Hoxton Park in the West, Concord in the North and the southern extents of the Sydney CBD to the Malabar Water Resource Recovery Facility (WRRF) for treatment prior to discharge from deep ocean outfalls.

The trunk main of the Malabar System is the South-Western Sydney Ocean Outfall Sewer (SWSOOS); a multi-barreled carrier that transfers wastewater from Arncliffe eastward across the Airport site to the Malabar WRRF at Malabar Headland. The original pipeline (called SWSOOS No.1) lies to the north. The SWSOOS was amplified with the construction of two pipelines (called SWSOOS No.2) to the south.

The SWSOOS has four monitored Emergency Relief Structures (ERSs) located at Kingsford Smith Airport, collectively known as the Mill Stream ERS. Additionally, there is an ERS on a smaller main entering the trunk sewer from the north. These ERSs are crucial for the proper operation of the wastewater network. Periodically, the ERSs discharge wastewater that has backed up in the sewer and releases into the Mill Stream seaward of the saltwater exclusion weir. This weir separates the tidally flushed waters of the Mill Stream and Botany Bay from the impounded freshwaters of the Engine Pond. The Mill Stream flows into Botany Bay near Foreshores Beach.

ERSs are vital components of any wastewater network and are included in all sewer systems around the world. They release excess flows from the sewer to prevent surcharging through surface openings into inhabited areas, (people's homes), and to avoid excessive pressure build-up within the sewer. These structures and their discharges are commonly referred to as overflows. The released flows are directed to stormwater systems, streams, and estuaries, and in some cases, to structures designed for temporary storage. ERSs activate in response to rainfall, when the volume of stormwater entering the sewer exceeds its capacity.

The Mill Stream ERS discharge is located on and potentially impacts air, land and waters of the Kingsford Smith Airport site. Given this, it requires Authorisation (Licensing) under federal *Airports Act* and the *Airports 1996 (Environment Protection) Regulations 1997*. In addition to federal regulation, the Mill Stream ERSs are regulated under the *Protection of the Environment Operations Act 1997* (POEO Act). Wastewater reticulation systems and wastewater overflow structures are included in the definition of Sewage Treatment, which is a Scheduled Activity. The Mill Stream ERS is included under the Malabar wastewater system's Environment Protection Licence (EPL 372) overseen by the NSW Environment Protection Authority (EPA).



Figure 1: Location of emergency relief structures discharging to the Mill Stream

2.2 Authorisation 2024 to 2027

On 7 June 2024, the former Department of Infrastructure, Transport, Regional Development, Communications, and the Arts (DITRDCA) issued Sydney Water a conditional Authorisation under the *Airports (Environment Protection) Regulations 1997*. This Authorisation permits the periodic discharge of untreated diluted wastewater from the SWSOOS ERS overflow points to the Mill Stream. The Authorisation period extends from

7 June 2024 to 31 March 2027. The discharge must comply with the Environment Management Plan (EMP) dated 7 May 2024, which was submitted by Sydney Water in support of its application for the Authorisation, and the operating conditions outlined in Appendix A of the Authorisation.

2.3 Reporting (EMP Objective 7)

This document constitutes Environmental Management Plan (EMP) Compliance Report Number 2, prepared in accordance with Operating Condition 2 of Authorisation Number 01/2024. The report outlines Sydney Water's performance in implementing the requirements of the Authorisation and the associated EMP for the period 1 January 2025 to 31 December 2025.

As context, during the previous reporting cycle, Sydney Water sought an extension to the submission date of the EMP Compliance Report Number 1 (2025). A formal request was submitted to the Airport Environment Officer (AEO) on 20 January 2025, and the extension was approved on 24 January 2025, revising the submission deadline to 28 February 2025. This variation also aligned the timing of the Mill Stream Community Forum, which was subsequently held on 27 February 2025. Sydney Water submitted the prior year's compliance report to the AEO and Mill Stream stakeholders on 18 January 2025, consistent with the AEO's revised approval. This background provides important regulatory context for the subsequent variation requested and approved for the current reporting period.

For this reporting cycle, on 27 January 2026, the AEO approved Sydney Water's request to vary the EMP reporting period and submission deadline. In accordance with this approval, the compliance assessment period has been aligned to 1 January 2025 to 31 December 2025, incorporating the outcomes from Quarterly Report 5. To maintain transparency, project-specific updates within this Annual Report continue to reflect operational progress across the original Authorisation period of 17 January 2025 to 17 January 2026.

The report addresses the matters in regulation 5.17(a) to (c) of the AEPR as well as Operating Conditions of the Authorisation (Appendix A Operating Conditions of the Authorisation)

Table 1: Authorisation Requirements

Legislation	Clause No.	Clause	See Section
Airports (Environment Protection) Regulations 1997	5.17	The holder of an Authorisation granted for a period longer than 1 year must give the Airport Environment Officer who granted the Authorisation (or that person's successor) a report for each year that the Authorisation is in force, setting out:	2.2
		Details of the holder's performance in giving effect to the holder's plan under sub-regulation 5.07(3); and	3
		Details of progress (if any) made in reducing the generation of pollution or noise that is generated in excess of the approved limit, under the Schedules, for pollution or noise of that kind; and	3.5
		Any failure by the holder to comply with the terms and conditions (if any) of the authorisation	3 & 4

Table 2: Environment Management Plan Compliance Report Requirements

Authorisation Condition	Subject	Authorisation requirement	See Section
1	EMP Compliance	Sydney Water must comply with and implement the Environmental Management Plan dated 7 May 2024 (EMP) submitted in support of the Applicant's application, and is to implement the measures identified in the letter submitted to the AEO in compliance with condition (18)	2.2
2b	Reporting	Sydney Water must submit to the AEO a comprehensive report on	All

Authorisation Condition	Subject	Authorisation requirement	See Section
		its compliance with the EMP (EMP Compliance Report) in accordance with the requirements of clauses 5.17(a) to (c) of the Regulations by the following dates, for the following time periods: (b) by 28 February 2026, covering the period from 1 January 2025 to 31 December 2025. (NB: a variation was granted by the AEO on the 27 January 2026. New report due date 28 February 2026 covering the authorisation period begin 1 January 2025 to 31 December 2025.)	
3a (EMP Action 5.1)	Monitoring	Provide a report on the monthly frequency, duration and volume of all overflow events into Mill Stream.	3.5.1
3b	Monitoring	Provide a graph that includes monthly rainfall plots onto the Emergency Relief Structures (ERSs) gauge level to show baseline and overflow conditions and provide a written explanation of the conditions that led to each overflow event.	3.5.1
3c	Monitoring	Provide a graph with the total volume of overflows in ML per year since at least 2020.	3.5.1

Authorisation Condition	Subject	Authorisation requirement	See Section
3d (EMP Action 6.1)	Complaints management	Provide a summary of all environmental complaints received during the reporting period and provide evidence as to how each of the complaints has been addressed and resolved.	3.6.1
3e (EMP Action 1.1)	Overflow events	Detail the progress made in the reporting period towards the desilting of SWSOOS 2 referred to as Objective 1, Action 1.1 of the EMP.	3.1.1
3f (EMP Action 1.2	Overflow events	Detail the progress made in the reporting period to source control implementation referred to as Objective 1, Action 1.2 of the EMP.	3.1.2
3g and 11 (EMP Action 1.3)	Overflow events	Report the dates of the eight grit pit maintenance cycles undertaken and provide tonnage removed per cycle, referred to as Objective 1, Action 1.3 of the EMP.	3.1.3
3h (EMP Action 1.4)	Overflow events	Detail the progress made in the reporting period to the Malabar Strategic Business Case (SBC) referred to as Objective 1, Action 1.4 of the EMP.	3.1.4
3i and 20 (EMP Action 1.5)	Overflow events	Detail the progress made in the reporting period to the Botany Low Level Carrier Rehabilitation referred to as Objective 1, Action 1.5 of the EMP.	3.1.5
3j and 17	Grit Pits	Detail the progress made in the reporting period to	3.2

Authorisation Condition	Subject	Authorisation requirement	See Section
(EMP Action 1.3 and 2.1)		the feasibility assessment and relocation of the SWSOOS Grit Pits referred to as Objective 2, Action 2.1 of the EMP.	
3k (EMP Objective 3)	Hydraulic Improvement Plan	Detail the progress made in the reporting period to the Hydraulic Improvement Plan referred to as Objective 3 of the EMP.	3.3
3l (EMP Action 4.2)	Protect the environment and public health	Detail the progress made in the reporting period to wastewater screening implementation referred to as Objective 4, Action 4.2 of the EMP.	3.4.2
3m (EMP Action 5.4)	Monitoring	Detail the progress made in the reporting period to further reduce the concentration of discharge and improve compliance with the Regulations, including the water pollution limits in Schedule 2 of the Regulations.	3.5.4
3n	Monitoring	Describe, and provide evidence, of Sydney Water's compliance with condition L7.1 (Hydraulic Sewer System Model) of the Malabar Wastewater System Environmental Protection Licence (No. 372, issued by the NSW EPA).	4.1
3o and 18	Bird Strike	Detail Sydney Water's progress on the implementation of bird strike mitigation measures implemented in	4.2

Authorisation Condition	Subject	Authorisation requirement	See Section
		accordance with condition (18) and provide justification for any delay in implementation of such measures.	
3p (EMP Action 4.1)	Protect the environment and public health	Detail the volume of gross pollutants removed, syringe presence, photos, general observations, and water quality sampling results for overflow events and incidents of material harm.	3.4.1
3q (EMP Action 5.4)	Monitoring	Detail evidence of improvement in the receiving environment in consideration of affected ecosystems and the health and wellbeing of the community (water quality, community expectations, beach suitability grade, odour, First Nations community values).	3.5.4
4	Monitoring	In the period between the commencement of the Authorisation and 17 January 2026, the total number of wet weather overflow events into Mill Stream must not exceed a modelled performance of: a. 13 overflow events per year; and b. an overflow volume of 1,238 ML per year as measured by the hydraulic sewer system model. Compliance with this condition is to be reported in the 31 January	4.3

Authorisation Condition	Subject	Authorisation requirement	See Section
		2025 and 31 January 2026 EMP compliance reports.	
5	Monitoring	By the period commencing 17 January 2026 and ending 17 January 2027, the total number of wet weather overflow events at Mill Stream must not exceed a modelled performance of: a. 12 overflow events per year; and b. an overflow volume of 1,115 ML/year	4.3
6	Monitoring	In each annual EMP Compliance Report Sydney Water is to present any shortcomings in the achievement of proposed EMP targets and set out any corrective actions required to reduce modelled discharges to no more than the above limits by the required dates.	4.3
7	Reporting	Quarterly Reporting- Sydney Water must submit Quarterly Reports to the AEO within 21 days of the end of each quarter commencing with the report on the first quarter concluding on 30 September 2024.	3.7.1
8	Reporting	Quarterly Reports Must: a. demonstrate compliance with delivery timeframes set	3.7.1

Authorisation Condition	Subject	Authorisation requirement	See Section
		out I the EMP as applicable for each quarter and performance indicators for actions on Objective 1 to Objective 6 referred to in Part 6 of the EMP; and b. include details of the volume of gross pollutants removed, syringe presence, photos, general observations, and water quality sampling results for overflow events and incidents of material harm.	
9-10	Communication of compliance and compliance reporting	By 1 February 2026 and 1 February 2027, Sydney Water must provide an annual update on the progress of the implementation of the EMP at a community meeting to be held locally (e.g. Botany Town Hall). By 28 February 2026 , finalised copies of the Annual EMP Compliance Report must be provided to Bayside Council and published on the Sydney Water website.	4.4
11	Performance and other conditions	Sydney Water must achieve eight grit pit maintenance cycles in each 12-month period for the duration of the authorisation period.	3.1.3

Authorisation Condition	Subject	Authorisation requirement	See Section
12 (EMP Action 5.2)	Monitoring	Sydney Water must notify Sydney Airport Corporation Limited (Sydney Airport), Bayside Council and the AEO of any overflow event within 24 hours of Sydney Water becoming aware of the event.	3.5.2
13	Monitoring	Sydney Water must notify Sydney Airport, Bayside Council and the AEO of any incident of material harm within 24 hours of Sydney Water becoming aware of the event.	3.5.2
14	Performance and other conditions	Annual EMP Compliance Reports, Quarterly Reports, the bird strike risk assessment letter required under condition (18), the Water Quality Monitoring Report required under condition (21), and any other investigations undertaken for the duration of this Authorisation must be provided to Sydney Airport within 21 days of their finalisation.	4.5
15	Hydraulic Improvement Plan	Sydney Water must chair the Mill Stream Hydraulic Improvement Leadership Group (HILG) with representatives from Bayside Council, Sydney Airport, Department of Infrastructure, Transport, Regional Development, Communications and the Arts and the NSW Environment Protection Authority.	3.3

Authorisation Condition	Subject	Authorisation requirement	See Section
16	Performance and other conditions	In addition to Stakeholder Reference Group (SRG) meetings, Sydney Water must attend meetings with Bayside Council, all Sydney Airport Community Forum meetings, and Planning and Coordination Forum meetings to which it is invited, and provide an update to those forums on the progress of the implementation of the EMP.	4.6
17 (EMP Action 2.1)	Performance and other conditions	By 30 July 2024 Sydney Water must complete a feasibility assessment for the relocation of the SWSOOS grit pits and by March 2027 implement the preferred feasible option.	3.2.1
19	Performance and other conditions	By 30 September 2024, Sydney Water must submit its pricing proposals to the New South Wales Independent Pricing and Regulatory Tribunal (IPART), including funding allocation and milestones for: a. the 2025-2030 Wet Weather Overflow Abatement (WWOA) program (source control works); and b. the planning and commencement of works for the preferred network augmentation	4.7

Authorisation Condition	Subject	Authorisation requirement	See Section
		option identified in the Malabar SBC; and c. provide evidence including funding allocation and milestones of the submission to the AEO within 21 days of the submission of the proposal to IPART.	
20	Operational Works	By 31 December 2024 Sydney Water must complete all operational works for the Botany Low Level Carrier Rehabilitation project.	3.1.5
21	Reporting	Sydney Water must: a. By 31 July 2025, submit a Water Quality Monitoring Report to the AEO that reports comprehensively on Sydney Water's monitoring in Mill Stream and that sets out recommended actions for the improvement of water quality by Mill Stream and Surrounding Botany Bay area; and b. Must undertake any recommendations in the Water Quality Monitoring Report by 31	3.5.3

Authorisation Condition	Subject	Authorisation requirement	See Section
		March 2027 to the satisfaction of the AEO	
22	Reporting	By 31 December 2025, Sydney Water must provide a report describing the quality management system (QMS), methods and calibration for the hydraulic sewer system modelling of Mill Stream overflows prepared: a. with reference to the independent Criteria Review Committee audit and report as required by the Environment Protection Licence and direction from the NSW EPA; and b. to the satisfaction of the AEO.	4.1
23 (EMP Action4.2)	Operations	By 31 December 2026 Sydney Water must complete the construction and implementation of wastewater screening at Pump Station SP0038	3.4.5
24 (EMP Action 1.1)	Operations	By 31 March 2027, Sydney Water must have completed at least 40% of the SWSOOS 2 desilting program	3.1.1
25	Operations	By 31 March 2027 Sydney Water must demonstrate to the AEO's satisfaction that it has significantly progressed the concept design and environmental	

Authorisation Condition	Subject	Authorisation requirement	See Section
		assessments and approvals for the implementation of the preferred network option of the Malabar SBC	

Table 3: Environmental Management Plan (EMP) Actions

Objective	Actions	Performance Indicator/s	Refer Section
Objective 1 Increase capacity of the wastewater system to reduce frequency and volume of overflow	**Action 1.1** Desilt SWSOOS 2 - SP0038 to Malabar WRRF	Procurement and contract award to be completed by December 2024	3.1.1
	Action 1.2 Implement source control for the Malabar system to reduce wet weather inflows into the SWSOOS	Prospect, Greater Parramatta to Olympic Peninsula, Lower NGRS/Cooks and Lower Georges River catchment completed by June 2025 Completion of further WWOA stages as indicated in Appendix A and to be reported in Annual Compliance reports	3.1.2
	Action 1.3 Conduct Grit Pit Maintenance	Grit Pit Hardstand constructed November 2024 Achieve 8 maintenance cycles each 12-month period Increase tonnage removed per quarter	3.1.3
	Action 1.4 Implement Malabar Strategic Business Case (SBC) – network augmentation preferred option	Confirmation that Sydney Waters IPART pricing submission includes network augmentation funding allocation	3.1.4
	Action 1.5 Botany Low Level Carrier Rehabilitation	Completion of all operational works by December 2024 Provide increased storage when wastewater screens are operational	3.1.5

Objective	Actions	Performance Indicator/s	Refer Section
Objective 2 Feasibility of Grit Pit relocation	**Action 2.1** Conduct a feasibility assessment for the relocation of the SWSOOS Grit Pits	Report submitted to AEO by 30 June 2024 and present findings at the following SRG	3.2.1
Objective 3 Hydraulic Improvement Plan (HIP)	**Action 3.1** Chair Hydraulic Improvement Leadership Group (HILG)	Quarterly meetings conducted to support implementation and completion of Phase 2B and 3	3.3.1
	Action 3.2 Conduct HIP Phase 2B	Cost sharing agreement in place June 2024 Studies conducted and report submitted to AEO by February 2026 Progress of activities will be provided in Annual Compliance reports	3.3.2
	Action 3.3 Conduct HIP Phase 3	Cost sharing agreement in place February 2026 Works completed and detailed in a final report delivered to AEO by December 2026	3.3.3
Objective 4 Protect the environment and public health	**Action 4.1** Inspect Mill Stream and Foreshores Beach after all overflow events and remove gross pollutants	All inspections initiated correctly and adhere to Work Instructions – Mill Stream/Foreshore Beach wet weather clean-up Inspections within two days of discharge event ceasing and next daylight low tide Volume of gross pollutants collected in m3/event AEO and Sydney Airport notified of all material harm incidents within one business day	3.4.1
	Action 4.2 Implement wastewater screening at Airport Site	All works completed and screening implemented by December 2026 Completion of project stages as indicated in Appendix A and to be reported in Annual Compliance reports	3.4.2

Objective	Actions	Performance Indicator/s	Refer Section
	Action 4.3 Maintain permanent signage at Foreshore Beach	Permanent signage maintained at Foreshore Beach, all overflow inspections to include signage checks External review of public health content and language to be completed and implemented if required by October 2024	3.4.3
	Action 4.4 Ensure all maintenance personnel and contractors are aware of threatened species fact sheets	No impact to threatened bird species, fact sheet included in Work Instruction – Mill Stream/Foreshore Beach wet weather clean-up	3.4.4
	Action 4.5 Store gross pollutants appropriately during clean-ups	All waste correctly stored prior to disposal, evidenced by clean up photos and reports	3.4.5
	Action 4.6 Dispose of gross pollutants appropriately	All waste correctly disposed	3.4.6
Objective 5 Monitor wastewater system performance, odour and receiving waterway health	**Action 5.1** Conduct continuous overflow monitoring and routine monthly reporting	All monthly reports provided to AEO and Sydney Airport	3.5.1
	Action 5.2 Provide overflow alerts to AEO and Sydney Airport representatives	SMS overflow alerts are received for all overflows	3.5.2
	Action 5.3 Monitor the dry weather sewage capacity in the SWSOOS	Minimum wastewater level for a rolling 6-month period is maintained at 0.45m	3.5.3
	Action 5.4 Monitor water quality at Mill Stream	April 2024 – July 2025 Monitoring is complete and the final report delivered July 2025, including recommendations for future monitoring options	3.5.4

Objective	Actions	Performance Indicator/s	Refer Section
	Action 5.5 Air quality monitoring (H2S) near discharge location	October 2024 – September 2025 Monitoring completed and results reported by September 2025	3.5.5
Objective 6 Conduct effective complaint management	**Action 6.1** Respond to and investigate all complaints regarding the Mill Stream ERS	Response provided to complainant within 2-5 working days Complaints recorded and included in annual report	3.6.1
Objective 7 Progress Reporting	**Action 7.1** Provide Quarterly Update Report	Quarterly report to be provided within 21 days of the quarter ceasing.	3.7.1
	Action 7.2 Chair Quarterly Stakeholder Reference Group (SRG) meeting	SRG conducted within 4 weeks of the quarter ending	3.7.2
	Action 7.3 Provide Annual EMP Compliance Report	Annual Compliance Report submitted by 28 February 2026 or each year of the Authorisation	3.7.3

3 Environment Management Plan (EMP) 2024-2027

The EMP was prepared to support the application for a new Authorisation to operate the Mill Stream ERS, as required by Clause 5.07 of the *Airports (Environment Protection) Regulations 1997*. The EMP focuses on the near-term actions that are to be implemented during the operation of the ERS in the 2024-2027 Authorisation period. The EMP also covers long-term strategic work currently being progressed for the improvement of the Mill Stream ERS and the Malabar wastewater system.

The EMP was developed to:

- Review and manage identified environmental risks from the operation of the ERS to the receiving environment.
- Specify requirements on how environmental safeguards will be implemented to improve the operation of the Mill Stream ERS and water quality within Mill Stream and Foreshore Beach.
- Define responsibilities and reporting lines for implementation.
- Provide clear and appropriate performance indicators for the delivery and completion of EMP actions.
- Define the requirements for reporting and meetings.
- Meet the requirements of the Authorisation.

This report provides updates on all the actions detailed within objectives 1 to 7 of the EMP, these objectives are:

- **Objective 1** – Increase capacity of the wastewater system to reduce frequency and volume overflows
- **Objective 2** – Feasibility of relocating the Grit Pit
- **Objective 3** – Hydraulic Improvement Plan (HIP)
- **Objective 4** – Protect the environment and public health
- **Objective 5 –** Monitor wastewater system performance, odour and receiving waterway health
- **Objective 6 –** Conduct effective complaint management
- **Objective 7 –** Progress Reporting

3.1 EMP Objective 1 -Increase capacity of the wastewater system to reduce frequency and volume of overflow Environment Management Plan (EMP) 2024-2027

The most effective way for Sydney Water to improve the performance of the Mill Stream ERSs over time and comply with the requirements of the *Airports (Environment Protection) Regulation 1997* is to increase the capacity of the wastewater system. The actions updated below will deliver greater capacity and reduced overflow volume

and frequency, in particular desilting, grit removal and reducing the ingress of stormwater into the wastewater system.

3.1.1 EMP Action 1.1 – Desilt SWSOOS 2 -SP0038 to Malabar WRRF (Condition 3e)

Sydney Water's compliance status for EMP Action 1.1 / Authorisation Condition 3e will be included in the Annual Compliance Report at the end of the Authorisation period.

Due to the asset length and varying complexities of the project, the work is planned to be delivered in 6-8 work packages. The initial two packages of work are currently in progress.

Package A1 - North Barrel

The first package includes desilting of the first 330 linear metres of the North Barrel, as well as the construction of new ventilation hatches and enlargement of access points to facilitate future work. This work commenced in Quarter 4 of 2024 with approximately 35 tonnes of silt having been removed to date (Figure 2, Figure 3, Figure 4).

However, the continuation of works was hampered by flow isolation constraints required for safe access for crews. Additional site investigation and design work were required beyond the initial scope to address factors impacting the mitigation of dry weather overflow risk and the provision of safe access within the asset. These developments led to expanded technical assessments and design modifications to ensure compliance with regulatory standards and operational safety.

In 2025, work external to the asset were completed including, widening of the access hatch and installation of temporary covers. The permanent covers are currently being manufactured. The additional design works for the flow isolation valve have substantially been completed with final design expected in early 2026. The Planning Approval documentations have been issued to stakeholders for review.

The completion of final design and external approvals are now expected to be completed by March 2026. This has delayed the completion of package A1 works to April 2026, at which point 4% (330 metre of 9 kilometres) of SWSOOS2 will have been desilted, with approximately 320 tonnes of silt expected to be removed.

Package A2 - South Barrel

The second work package will commence after the completion of works within Package A1. Package A2 includes the desilting of 330 linear metres of the South cell with approximately 380 tonnes of silt is expected to be removed. Once completed, 7% (additional 330 metre of 9 kilometre) of SWSOOS2 will be desilted. The completion of Package A1 and A2 desilting work will deliver 9.5% of performance progress (tonnage removed) by June 2026.

Future Packages

Planning work for future packages commenced in November 2025.



Figure 2: Desilting SWSOOS2 Package A1



Figure 3: Site set-up for cross connection 2 Desilting



Figure 4: Decanting wastewater before moving silt off-site

3.1.2 EMP Action 1.2 – Implement source control for the Malaba System to reduce wet weather inflows into the SWSOOS (Condition 3f)

Sydney Water's compliance status for EMP Action 1.2 / Authorisation Condition 3f will be included in the Annual Compliance Report at the end of the Authorisation period.

Source control works reduce the amount of stormwater entering the wastewater system and decrease the frequency and volume of overflows from ERSs during wet weather. These works will be conducted in sewer catchments across the Malabar system and will be crucial to the medium to long-term improvement of the Mill Stream ERS. Three types of source control works will be used to address stormwater ingress (Refer Table and Table).

Table 4: Source Control Stages

Source Control Stage	Definition
Stage 1 – Inflow management	Involves rectifying ERS by installing backflow prevention valves. These valves prevent stormwater from flowing into the wastewater system from the overflow discharge pipe.
Stage 2 – Infiltration management	Focuses on reducing infiltration through damaged pipes and maintenance holes. This stage targets assets that are in high infiltration areas. Rectification works include pipe lining, maintenance hole repairs and installation of anti-infiltration devices (rain stoppers) in maintenance holes that are at risk of stormwater ponding or overland stormwater flow and flooding.

Stage 3 – Private properties	Implementation of smoke testing and property inspections to identify stormwater connections and rectifying defective assets. Rectification works include repairing faulty overflow relief gullies and redirecting roof drainage connections from the sewer to the stormwater

The progress of work programs across the prioritised catchments within the Malabar system is provided below (Table).

Table 5: Source Control Works-Status Update

Prioritised catchment within the Malabar system	Refer To Figure	Update	Stage 1- Inflow Management	Stage 2- Infiltration Management	Stage 3- Private Properties
Prospect Catchment	Figure 5	Source control works delivery complete.	90 ERSs equipped with backflow prevention valves 400 Maintenance holes fitted with rain stoppers	11 km of pipes relined	11,300 properties smoke tested 530 property defects rectified
Lower North Georges River Submain (NGRS) & Cooks River Catchment	Figure 5	Source control delivery works complete	101 ERSs equipped with backflow prevention valves	-	-
Greater Parramatta & the Olympic Peninsula (GPOP) areas in the Cooks River catchment	Figure 5	Source control delivery works are in progress	14 ERSs equipped with backflow prevention valves	-	-

Prioritised catchment within the Malabar system	Refer To Figure	Update	Stage 1- Inflow Management	Stage 2- Infiltration Management	Stage 3- Private Properties
Wet Weather Overflow Abatement (WWOA) 2024-25 catchments- Peakhurst, Lugarno & Padstow	Figure 5	Source control works delivery is complete	147 ERSs equipped with backflow prevention valves 500 maintenance holes repaired and fitted with rain stoppers	9 km of pipes investigated 2.4km of pipes relined	14,000 properties were smoke tested 700 property defects rectified
Mill stream Long-term source control works	Figure 6 Figure 7	Source control investigation began in August 2025 but was delayed due to cost proposal negotiations. Now that these issues have been resolved, field investigation works have commenced.	124 ERSs to be equipped with backflow prevention valves	1215 maintenance holes to be fitted with rain stoppers	225 schools to be smoke tested

Prioritised catchment within the Malabar system	Refer To Figure	Update	Stage 1- Inflow Management	Stage 2- Infiltration Management	Stage 3- Private Properties
Wet Weather Overflow Abatement (WWOA) 2025-30 - source control works in 9 catchments: Kensington & Rockdale, Kingsgrove & Randwick Banksia & Ashfield Clementon Park & Lewisham Liverpool & Wakely Mt. Pritchard Prairiewood & Ashcroft Edensor Park Wetherhill Park	Figure 8 Figure 9	The source control investigation is underway but has been delayed due to cost proposal negotiations. These are expected to be resolved soon and field investigations will commence in February 2026	240 ERSs to be equipped with backflow prevention valves	3,500 maintenance holes to be investigated for repair and fitted with rain stoppers 35 km of pipes to be investigated for relining	50,000 properties to be smoke tested to identify defects and repair
Growth 2025-30 - source control works in 5 catchments: Alexandria, South Sydney, Mascot Homebush, Strathfield Moorebank, Chipping Norton, Liverpool Riverwood Concord West and Concord East	Figure 10 Figure 9 Figure 11	The source control business case has received approval, and investigation works are programmed to commence in March 2026	60 ERSs to be equipped with backflow prevention valves	1,050 maintenance holes to be investigated for repair and fitted with rain stoppers 17 km of pipes to be investigated for relining	12,000 properties to be smoke tested to identify defects and repair

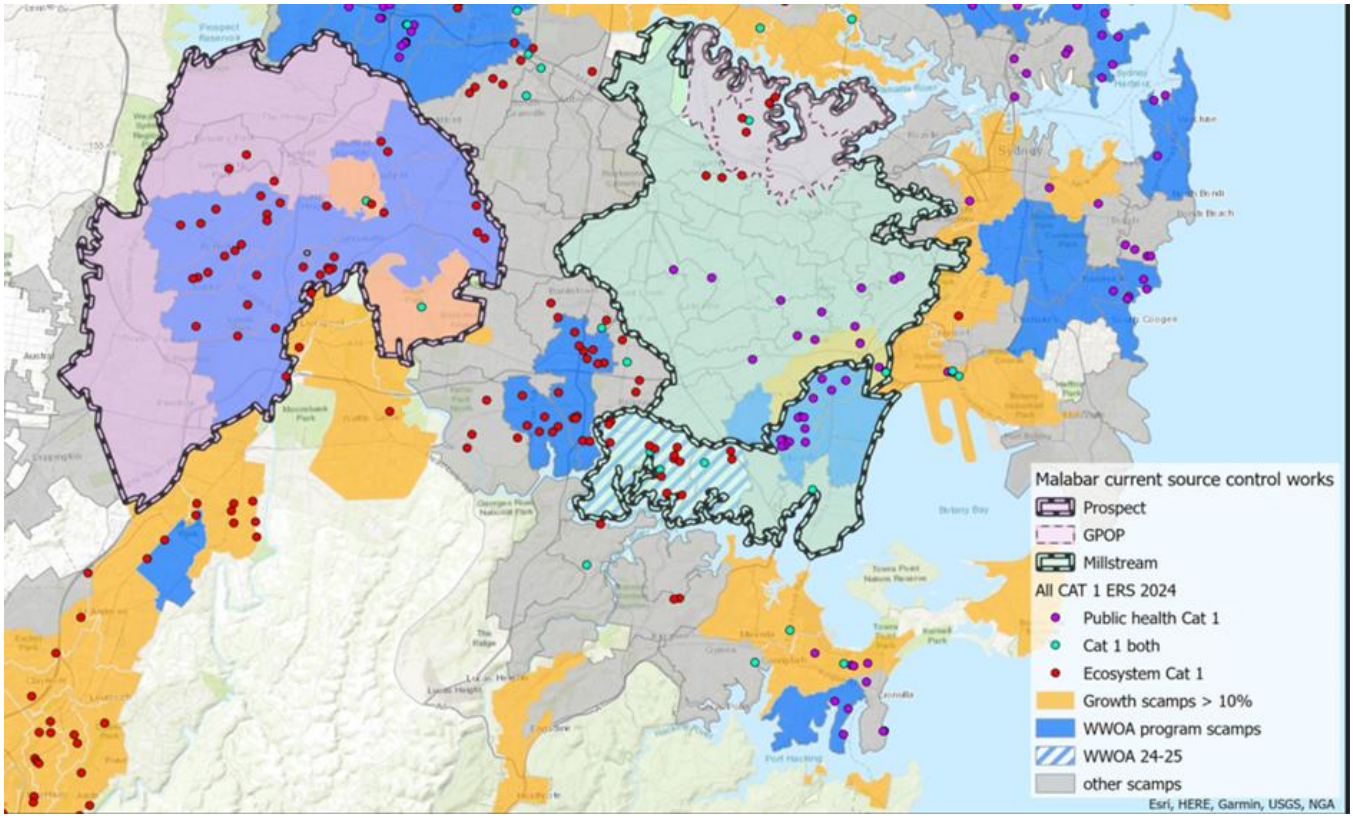


Figure 5: Source Control Catchments in the Malabar System

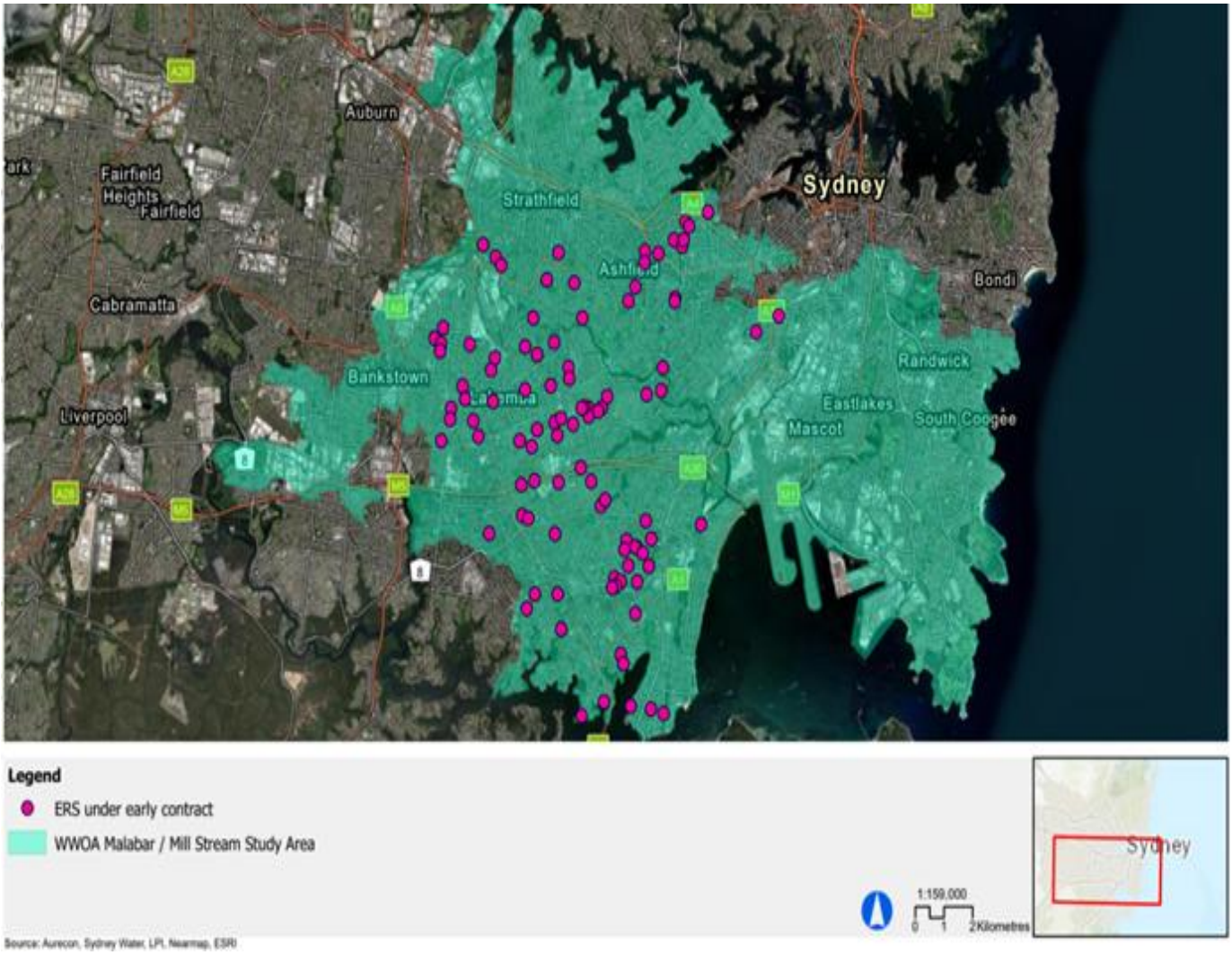


Figure 6: Mill Stream Source Control-ERS under consideration

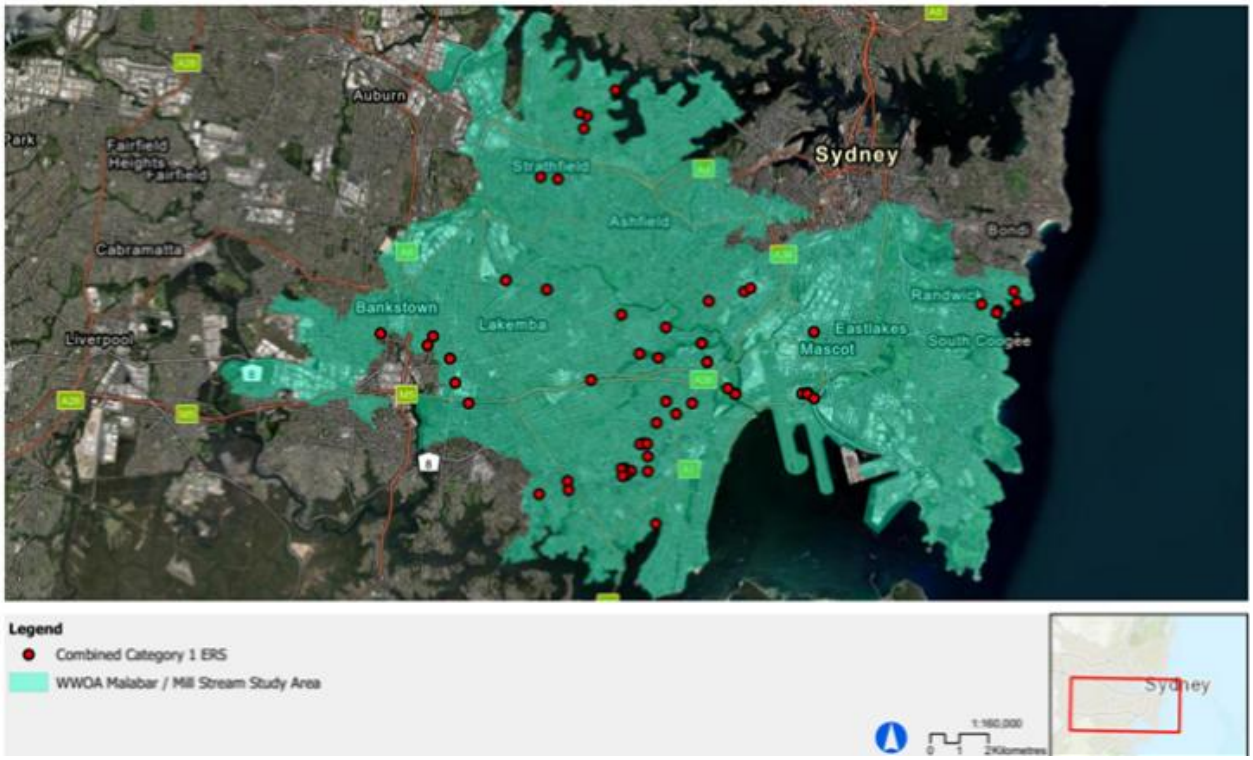


Figure 7: Mill Stream Source Control -Private properties under consideration

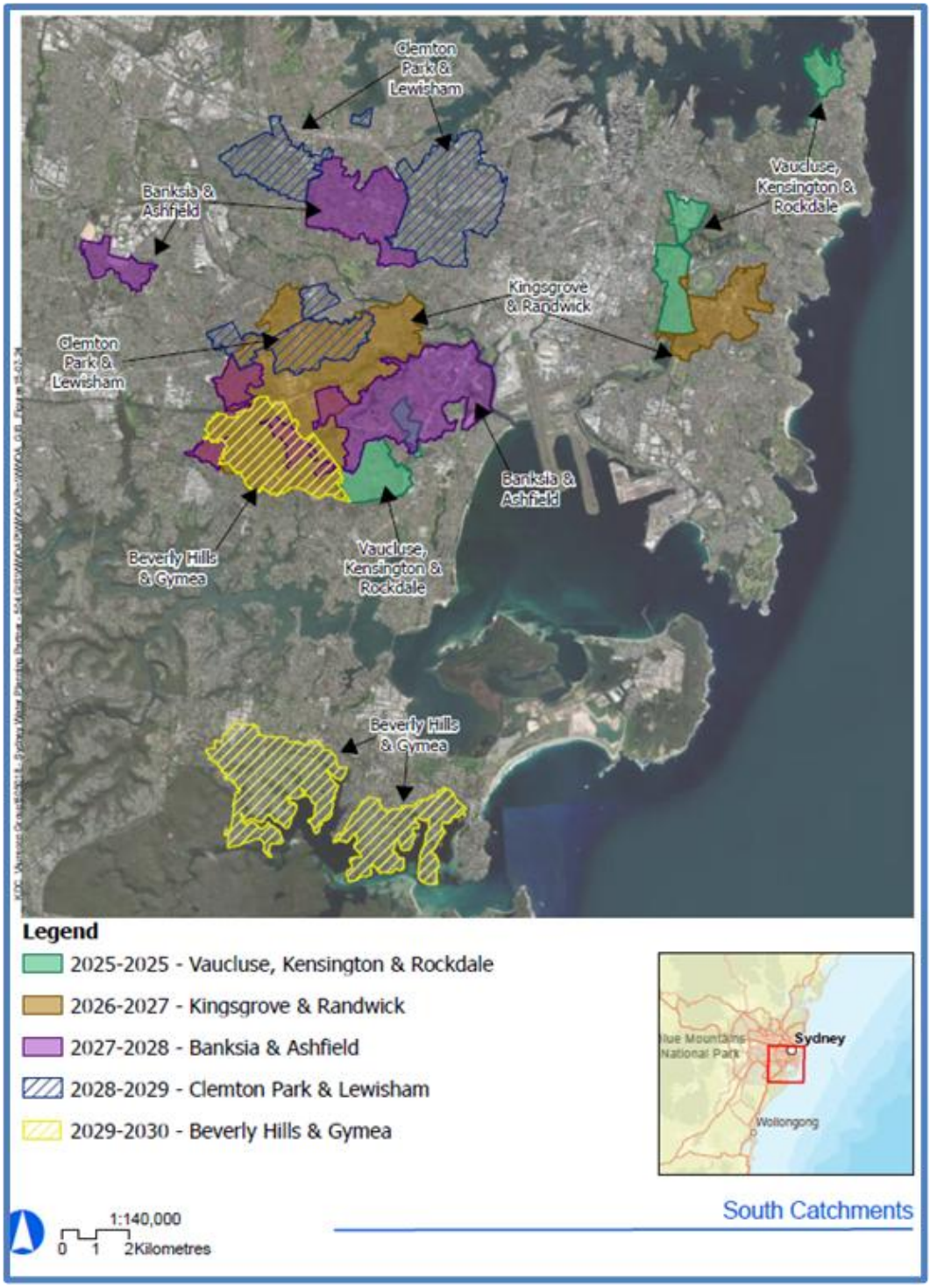


Figure 8 : WWOA 2025-2030 Catchments – Area South

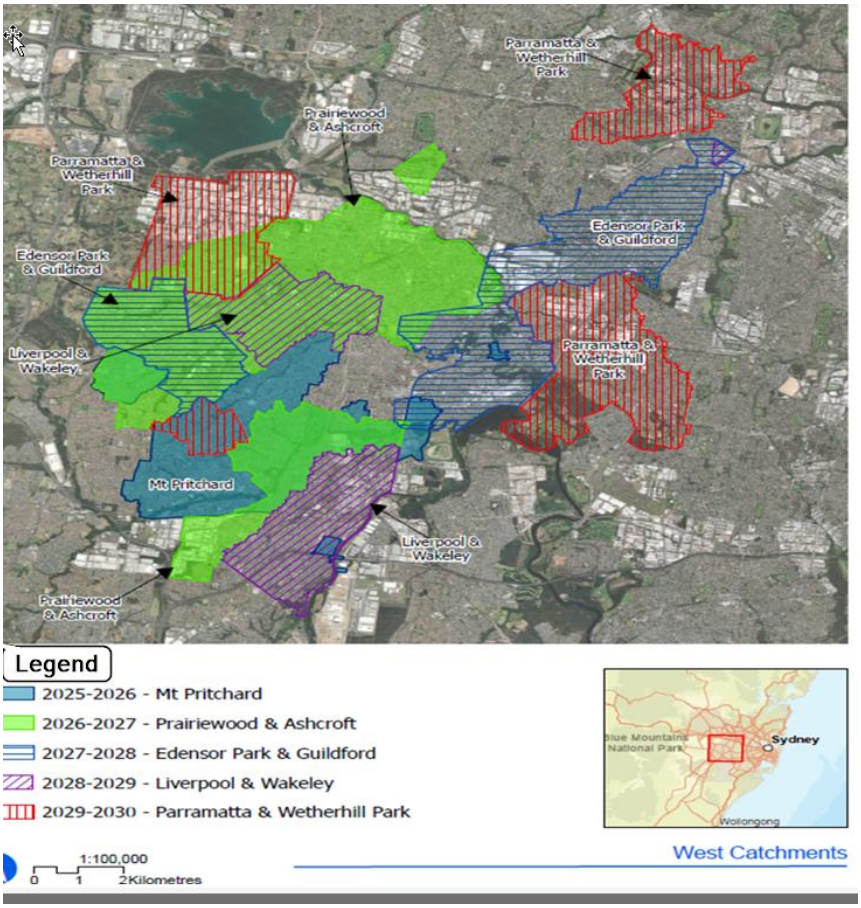


Figure 9: WWOA 2025-2030 Catchments Area West

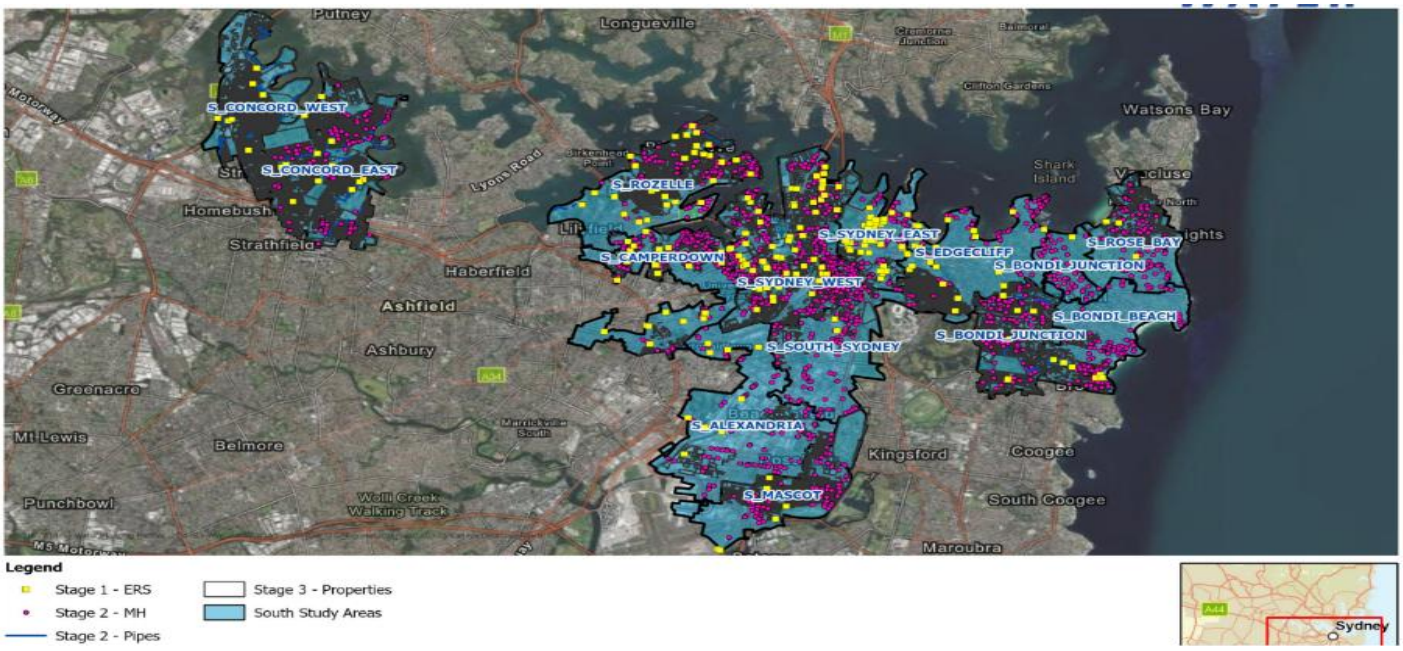


Figure 10: Growth 2025 – 2030 Catchments- Area South

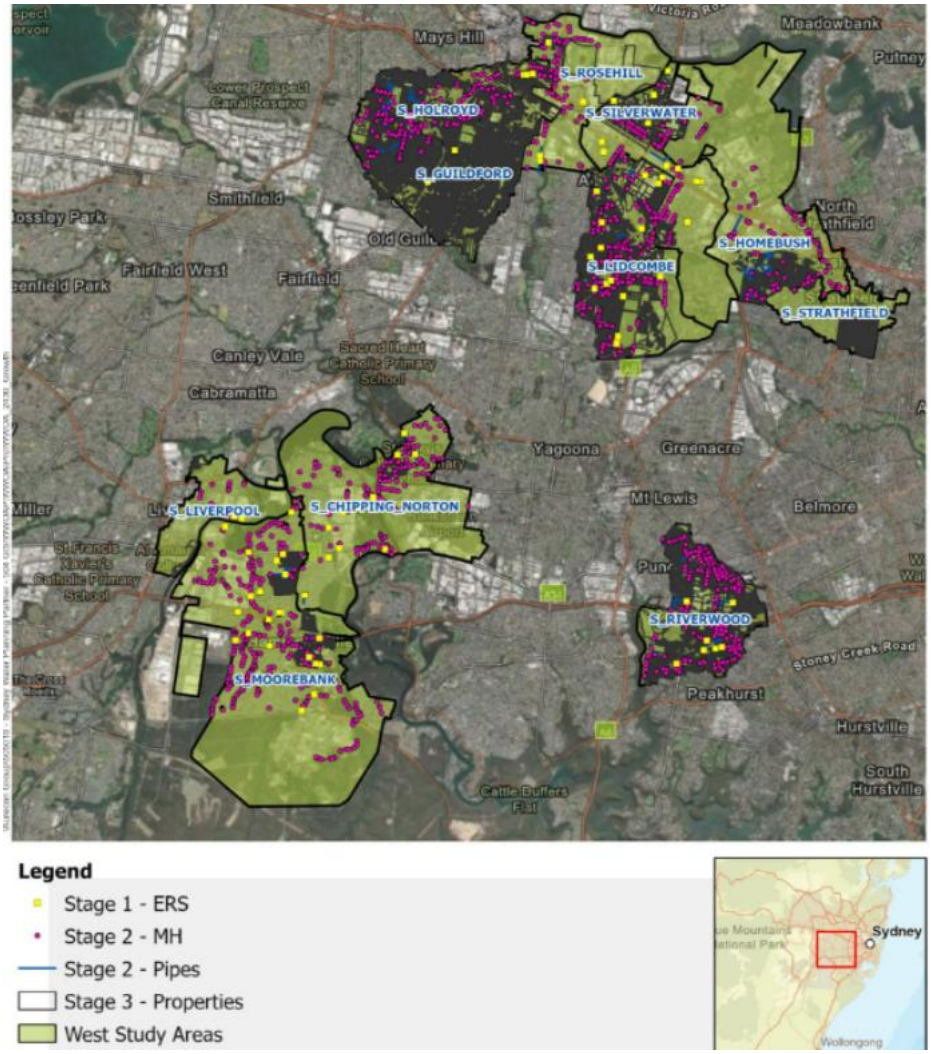


Figure 11: Growth 2025-2030 Catchments – Area West

3.1.3 EMP Action 1.3 – Conduct Grit Pit Maintenance (Condition 3g)

Sydney Water is compliant with the EMP and Authorisation for EMP Action 1.3 (Condition 3g) for the reporting period 17 January 2025 to 31 December 2025.

Routine maintenance of the grit pits located within the Sydney Airport precinct (SWSOOS1, SWSOOS2 North and SWSOOS2 South) was undertaken throughout the reporting period to prevent downstream grit accumulation and maintain system performance. A total of 1,312.9 tonnes of silt was removed across seven completed maintenance cycles. As the January 2025 cycle formed part of the previous compliance period, the first cycle for this reporting year commenced in March 2025. The eighth cycle, scheduled for December 2025, was delayed due to Aviation Security Identification Card (ASIC) renewal constraints and has been rescheduled for completion in early 2026.

Operational efficiency has continued to improve, supported by the completion of the hardstand area in October 2024, which enabled safe, all-weather access for maintenance crews and facilitated Sydney Airport's approval for daytime cleaning. Ongoing collaboration with Sydney Airport Operations has also strengthened planning and coordination for desilting activities and reduced the number of shifts required – all weather access for maintenance crews and facilitated Sydney Airport's approval for daytime cleaning (Refer to Figure 12 & Figure 13).

Based on the maintenance completed, the volume of material removed, and the operational improvements implemented, Sydney Water has met the intent and operational requirements of EMP Action 1.3 and remains compliant with this condition (Refer to Table 6).

Table 6: Grit Pit Maintenance Cycles

Maintenance cycles	Dates	Silt removed (Tonnes)	Comments
Cycle 1	03-07 March2025 10-14 March 2025	210	
Cycle 2	22-24 April 2025 29-30 April 2025 01-02 May 2025 05-09 May 2025	310	No work 28 April high flow due to wet weather
Cycle 3	16-18 June 2025 23-27, 30 June 2025	173.5	High flow due to wet weather limited work from July1-4
Cycle 4	4, 6-8 August 2025 11-15 August 2025	196.2	Full cycle completed with 1 shift lost for bad weather (fog)
Cycle 5	22-26 September 2025 29-30 September 2025	181.5	Full cycle completed

Maintenance cycles	Dates	Silt removed (Tonnes)	Comments
	01-03 October 2025		
Cycle 6	3-7 November 2025 10-12 November 2025	126.6	Full cycle completed
Cycle 7	15-16 December 2025 18-19 December 2025 22-23 December 2025	115.1	Delayed by one week due to issues with renewal of ASIC passes. completed.
Cycle 8	05-09 January 2026 12-16 January 2026		Deferred to Feb 9, 2026, due to delayed completion of December 2025 cleaning cycle
Total Silt (Tonnes) Removed for the reporting period		**1312.9**	

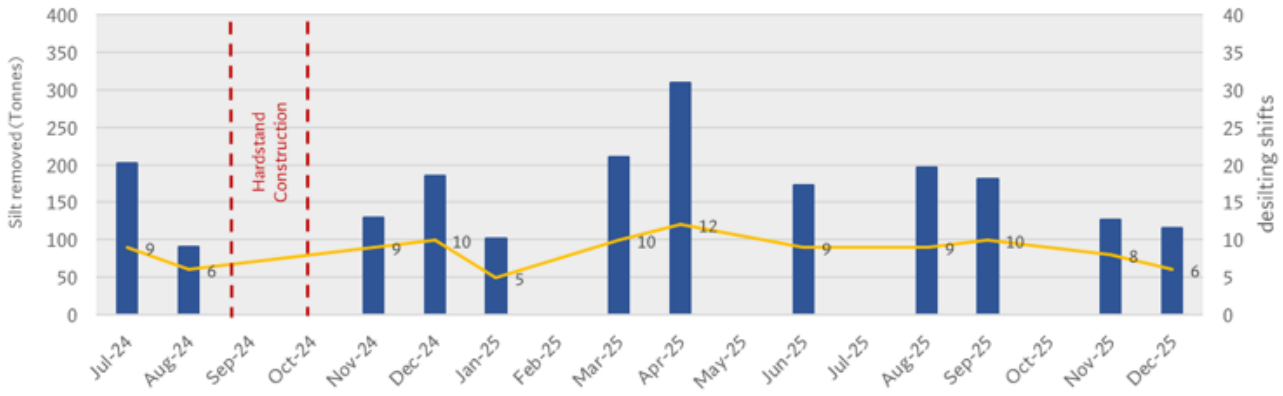


Figure 12: SWSOOS Airport Grit Pits Silt Removal 2024-2025

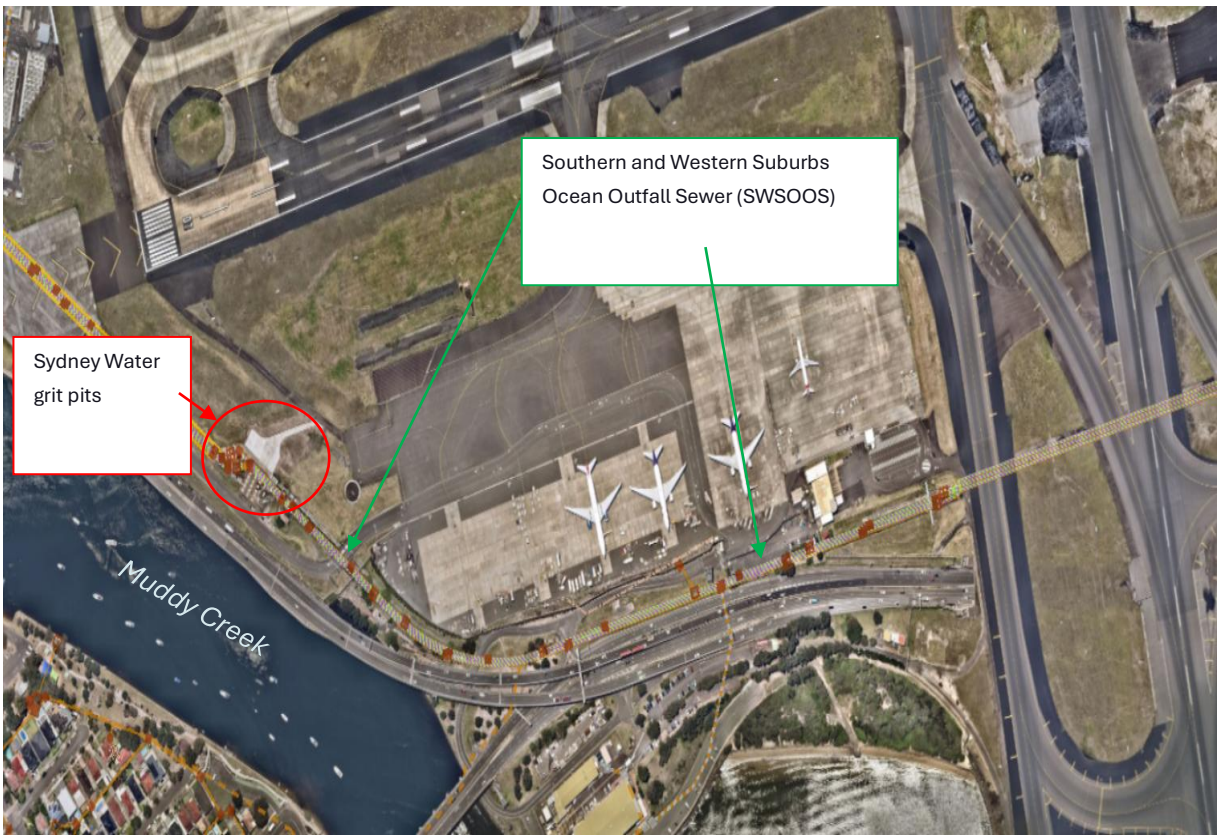


Figure 13: SWSOOS Sydney Airport Grit Pit Location

3.1.4 EMP Action 1.4 – Implement Malabar Strategic Business Case – Network Augmentation (Condition 3h)

Sydney Water's compliance status for EMP Action 1.4 / Authorisation Condition 3h will be included in the Annual Compliance Report at the end of the Authorisation period.

The near to mid-term (formerly referred to as long-term) strategy for the Malabar Wastewater System is documented in the Malabar System Investment Program Strategic Business Case (SBC). While progressing the options planning for the SBC, Sydney Water's investigations showed that releasing highly treated water to the Georges River (system disconnection) or building a new SWSOOS pipeline from Arncliffe to Malabar (system augmentation) would cater to demand through to 2046. The modelling also showed additional benefits would be achieved with planned operational measures of in-catchment source control and SWSOOS desilting. These provide better value for money than the highly expensive deep tunnel from Arncliffe to Malabar or a new wet weather treatment plant at Mill Stream, both considered in the earlier SBC. Sydney Water is currently finalising the preferred option to service Growth till 2046, and a decision will occur in 2026. Sydney Water will progress the delivery planning of the preferred option considering the capped budget scenario.

Capital investments for the near-term system works are provisioned in the 2025-2030 IPART submission, with a final determination received in September 2025. Capital investments for mid-term system works will be provisioned in the 2030-2035 Independent Pricing and Regulatory Tribunal (IPART) submission.

Sydney Water met with the Airport Environmental Officer (AEO) on 9 October 2025 to present an update on the IPART determination. The presentation covered the background and newly approved pricing structure, an overview of expenditure allowances for the 2025–2030 regulatory period and outlined the next steps.

The meeting was conducted online and provided a summary of the current determination as approved by IPART.

Sydney Water is currently prioritising its delivery commitments and remains dedicated to ensuring that every dollar spent delivers tangible value for our customers.

Between now and March 2026, Sydney Water will:

- Finalise the prioritisation of expenditure plans
- Present the prioritised plan to the Board for endorsement
- Communicate the outcomes of the prioritisation process to staff, customers, and stakeholders
- The next meeting to provide an update to the AEO is scheduled for early March 2026.

3.1.5 EMP Action 1.5 – Botany Low Level Carrier Rehabilitation (Condition 3i & 20)

Sydney Water is not compliant with the EMP and Authorisation for EMP Action 1.5 (Conditions 3i and 20) for the reporting period 17 January 2025 to 31 December 2025.

The Botany Low Level Carrier is a disused gravity main that requires extensive rehabilitation to prevent asset failure. Once rehabilitated, this asset can be utilised to increase wet weather storage at Sewer Pumping Station 38 (SP0038) in Mascot. During periods of high flow, sewage will accumulate in the sewer and be pumped to SP0038 for wastewater screening. The accumulated wastewater will then be discharged into the SWSOOS2 via SP0038 once sewer flows have subsided.

The project, originally scheduled for operational completion in December 2024, was delayed due to limited accessible areas without an access agreement and the extended negotiations required to secure the access license with Sydney Airport.

The license agreement negotiation completed in February 2025, enabling Sydney Water to review the project scope and re-engage the construction contract. Cleaning and assessment of an 82 m section between SP0038 and Ross Smith Avenue were completed in May 2025. It was determined that additional civil works, including dig-and-lay sections and raising maintenance holes, require a revision to license terms. Further, the scope review also included reassessment of benefits to consider if a focus on subsidence repairs would be supported. Sydney Water has been negotiating these changes with Sydney Airport, after which the revised license will be submitted for legal review prior to commencement.

In parallel to access negotiation, Sydney Water has completed contractor engagement and finalised design approval for the relining option. Subject to finalisation of the license agreement with Sydney Airport, site mobilisation is scheduled for early 2026, with project completion forecasted for early 2027.

Further to the current schedules, Sydney Water submitted a Variation to the Authorisation in September 2025. This matter was discussed during the IPART meeting held on 7 March 2025 and documented in the meeting minutes arising from that meeting. In addition, Sydney Water will be submitting a variation to the Environment Management Plan (EMP), in conjunction with the September 2025 Authorisation variation, to address the Botany Low Level Carrier Project.

3.2 EMP Objective 2 – Feasibility of Grit Pit Relocation

Sydney Water grit pits are situated within the boundaries of Sydney Airport. To ensure appropriate maintenance, regular access to these facilities is essential; however, such access is often complicated by operational and security constraints inherent to the airport environment. In response to these challenges, Sydney Water has conducted a feasibility assessment to evaluate the potential relocation of the grit pits to a site outside airport land.

3.2.1 EMP Action 2.1 – Conduct feasibility assessment for the relocation of the SWSOOS Grit Pits (Condition 3j & 17)

Sydney Water's compliance status for EMP Action 2.1 / Authorisation Condition 17 will be included in the Annual Compliance Report at the end of the Authorisation period.

The details of the feasibility assessment for the relocation of Sydney Water's grit pits have been reported in the Annual Compliance Report 1. In accordance with condition 17 of the Authorisation, Sydney Water delivered the final feasibility report to the Airport Environment Officer (AEO) on 30 July 2024. The report's final recommendation was to proceed with Option 2—maintaining daytime access to the grit pits, and to monitor the effectiveness of this arrangement over a 12-month period.

Daytime access has been successfully implemented over the past year, supported by the completion of a hard stand, which has facilitated access during wet periods and enhanced silt removal operations. Nevertheless, some cancellations have occurred due to the unavailability of security escorts from Sydney Airport. This issue has been formally raised with Sydney Airport, and Sydney Water will continue to engage with airport representatives to develop a viable long-term solution. Progress and ongoing challenges will be discussed at future Mill Stream Stakeholder Reference Group (SRG) meetings.

3.3 EMP Objective 3 – Hydraulic Improvement Plan (HIP)

Opportunities to enhance the hydraulic performance of the Mill Stream were systematically investigated, leading to the development of a comprehensive delivery plan by Sydney Water. To provide strategic oversight and guidance for the ongoing implementation of the Hydraulic Improvement Program (HIP), Sydney Water established the Hydraulic Improvement Leadership Group (HILG). This group comprises representatives from Bayside Council, Sydney Airport (SYD), the Department of Infrastructure, Transport, Regional Development, Communications, Sport and Arts (DITRDCSA), the NSW Port Authority, and the NSW Environment Protection Authority (EPA). The HILG is responsible for ensuring effective governance and coordination throughout the continued staging of the HIP.

3.3.1 EMP Action 3.1 – Chair Hydraulic Improvement Leadership Group (HILG) (Condition 3k & 15)

Sydney Water's compliance status for EMP Action 3.1 / Authorisation Condition 15 will be included in the Annual Compliance Report at the end of the Authorisation period.

Sydney Water continues to lead collaborative efforts under the Hydraulic Improvement Leadership Group (HILG) and the broader Stakeholder Reference Group (SRG) to deliver key environmental and operational improvements for the Mill Stream system. These initiatives align with the Environment Management Plan (EMP) and Authorisation requirements for 2024–2025.

Sydney Water chaired a Mill Stream HILG meeting on the 5 March 2025, attended by representatives from Sydney Water, Sydney Airport, Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA), Bayside Council, NSW Port Authority and the EPA. Sydney Water continues to provide updates on progress for EMP Action 3.2 through the Stakeholder Reference Group (SRG), which is attended by all members of the Hydraulic Improvement Leadership Group (HILG). The HILG comprises representatives from Sydney Water, Sydney Airport, Bayside Council, the NSW Port Authority and the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA).

Strategic-level discussions between Sydney Water and Sydney Airport have focused on the key tasks associated with Phase 2B of the Hydraulic Improvement Plan and the indicative cost considerations required to support internal funding approvals and project development.

The HILG agreed that updates on progress and further design development for the Mill Stream mouth desilting project will continue to be provided through future SRG meetings, subject to project creation being approved and a project manager being appointed. The HILG will recommence meeting as a separate entity to the SRG when the project to dredge the mouth of the Millstream is created and a project manager appointed. At that time the function of the group will be that of the "Project Board"

3.3.2 EMP Action 3.2 – Conduct HIP Phase 2B (Condition 3k)

Sydney Water's compliance status for EMP Action 3.2 / Authorisation Condition 3k will be included in the Annual Compliance Report at the end of the Authorisation period.

Dredging the sand from the mouth of the Millstream is being progressed as the preferred option. Sydney Water and Sydney Airport aim to contribute to this outcome according to their respective needs and governance requirements. Sydney Water and Sydney Airport are progressing projects and submitting funding requests to achieve the required internal and external approval for works. The primary needs for Sydney Water are to ensure the free flow of the stormwater mains draining Botany, located at Folkestone Parade and The Esplanade. For Sydney Airport, the drivers are to maintain water depths and manage sediment accumulation. Both organisations share the goal of maintaining the health and natural flows of the waterway.

3.3.3 EMP Action 3.3 – Conduct HIP Phase 3 Implementation (Condition 3k)

Sydney Water's compliance status for EMP Action 3.3 / Authorisation Condition 3k will be included in the Annual Compliance Report at the end of the Authorisation period.

EMP Action 3.3 relates to the implementation of Phase 3 of the Hydraulic Improvement Plan (HIP) and is a future-facing action. No construction activities were required or undertaken for Action 3.3 during the current reporting period. During this period, preparatory planning and governance activities continued. Sydney Airport is progressing the project through its internal budget allocation and approval processes. Implementation of the Phase 3 operational solution will be subject to the approval and governance requirements of each organisation, with each party developing its respective delivery plan to enable coordinated implementation. Sydney Water has submitted its project prospect for internal consideration, which is progressing through Sydney Water's investment prioritisation and optimisation processes, with outcomes expected in early 2026.
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3.4 EMP Objective 4 – Protect the environment and public health

Sydney Water remains committed to enhancing the performance of the Mill Stream Emergency Relief Structures (ERS). To reduce both the frequency and volume of overflows, all practicable measures will continue to be implemented to minimise associated environmental and public health risks.

3.4.1 Action 4.1 -Inspect Mill Stream and Foreshores Beach after all overflow events and remove gross pollutants (Condition 3p)

Sydney Water's is compliant with for EMP Action 4.1 / Authorisation Condition 3p.

Sydney Water crews attend the site after every notified overflow event and assess whether gross pollutants are present, and an environmental clean-up is required.

3.4.2 Monitored discharges

The total recorded discharge for the reporting period was 2,385 ML, occurring over 23 overflow events and 61 discharge days. Detailed monthly volumes, event durations, and discharge summaries for the period 1 January 2025 to 31 December 2025 are provided (Appendix 1: Sewer Overflow Volume of Discharge (ML) estimate report Mill Stream (Botany Bay)).

A comparison of Monthly totals for wastewater discharge and rainfall at Marrickville Bowling Club, Kogarah Golf Club and Bexley can be reviewed in Appendix 1: Sewer Overflow Volume of Discharge (ML) estimate report Mill Stream (Botany Bay) Rain Gauge locations used for reporting comparison can be viewed in

Figure 21 and Figure 22.

During preparation of this report, Sydney Water undertook a quality review of all underlying discharge data used throughout the year. This review identified several inconsistencies in previously extracted datasets. After

correction, the reported discharge volumes for August and September decreased, resulting in an overall reduction of approximately 2% in the total annual discharge volume. Monthly totals presented in this report therefore reflect the corrected data. The monitoring sensors which are used for measuring volume are located at the overflow points (Figure 21).

3.4.3 Overflow inspections and clean-up

Sydney Water monitors overflow activity at all Mill Stream Emergency Relief Structures (ERSs). When an overflow occurs at any ERS, an alert is generated and transmitted to the Systems Operations Centre (SOC). Following cessation of the overflow, a work order is raised for a field crew to attend site and undertake an inspection and material harm assessment in accordance with Sydney Water procedures.

During the reporting period from 1 January 2025 to 31 December 2025, a total of thirty-eight (38) site inspections were undertaken in response to overflow alerts. Of these, eight (8) inspections met the material harm assessment criteria and were declared material harm incidents requiring environmental clean-up at Mill Stream and Foreshore Beach.

Where material harm was identified, environmental clean-up activities were initiated, including the removal of gross pollutants and debris. Clean-up activities are reported in the month in which the clean-up work was undertaken. In some cases, clean-ups commenced in one month and were completed in the following month. To avoid double-counting, each material harm incident is counted once only, and clean-up volumes are attributed to the month in which the clean-up activity occurred.

Accordingly, while monthly clean-up figures presented in Table 7 do not directly sum to eight, the total number of material harm incidents requiring clean-up during the reporting period is eight, consistent with Appendix 3: Summary of Mill Stream Incident Responses during the reporting period.

Between 1 January 2025 and 31 December 2025, environmental clean-ups resulted in the removal of approximately 152 m^3 of gross pollutants, including debris and syringes. The majority of inspections and clean-ups occurred during periods of increased rainfall in August and September 2025, with some clean-up activities extending into subsequent months. Clean-ups were undertaken at Mill Stream and Foreshore Beach, with gross pollutants collected, bagged and removed from site (refer Figure 14).

Field sampling and analytical testing were undertaken by Sydney Water's Environmental Response Team for each of the eight material harm incidents. Analytical results were provided to Mill Stream stakeholders during and following material harm notifications. References to the relevant analytical reports are included in Appendix 3.

Table 7: Mill stream incident responses for authorisation period 1 January 2025 to 31 December 2025

Month	Number of Inspections	Number of Clean-Ups	Gross pollutants removed m3	Syringes removed
January 2025	5	2	6	9
February 2025	3	1*	3.33	0
March 2025	3	2*	2.37	0
April 2025	4	2*	14.44	4
May 2025	9	1*	5.81	3
June 2025	0	0	0.00	0
July 2025	4	2*	2.11	2
August 2025	6	1*	68.56	25
September 2025	2	1*	43.96	25
October 2025	0	0	0.00	0
November 2025	2	1	5.44	1
December 2025	0	0	0.00	0
Total 1 Jan 2025 to 31 Dec 2025	**38**	***8**	**152.03**	**69**

***Note:** A total of eight (8) inspections met the material harm assessment criteria during the reporting period and resulted in environmental clean-ups. Clean-up activities are reported in the month in which the clean-up work was undertaken. Where clean-ups commenced in one month and were completed in the following month, volumes are attributed to the month of clean-up activity. Each material harm incident is counted once only, consistent with Appendix 3.*

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Figure 14: Foreshore Beach Clean-up Photos

3.4.4 EMP Action 4.1 – Inspect Mill Stream and Foreshore Beach after all overflow events and remove gross pollutants. (Condition 3p)

Sydney Waters is compliant with all Foreshore Beach overflow events and removal of gross pollutants. Operational teams have responded to all overflow events during the reporting period. For detailed information on overflow inspections, material harm assessments and clean-up responses undertaken during the reporting period, refer to Section 3.4.3 (Overflow inspections and clean-up), Table 7, and Appendix 3: Summary of Mill Stream Incident Responses during the reporting period.

3.4.5 EMP Action 4.2 – Implement wastewater screening at Airport site (Condition 3L)

Sydney Water's compliance status for EMP Action 4.2 / Authorisation Condition 3l will be included in the Annual Compliance Report at the end of the Authorisation period.

The objective of wastewater screening is to reduce the transport of gross pollutants via Mill Stream wet weather overflows to Foreshore Beach, thereby minimising potential harm to public health and the environment. In March

2023, a feasibility and options study identified wastewater screening at Sewer Pumping Station 38 (SP0038) as the preferred option. The screens will provide preliminary treatment of overflows by redirecting discharges through a screening system to remove debris and rags prior to reaching Mill Stream. In October 2024, the initial concept design of the preferred option indicated significant impact to the heritage fabric of the state heritage listed SP0038, resulting in prolong delivery timeframe and construction challenges.

In January 2025, an analysis was completed to explore alternative solutions that could meet project objectives within the required timeframe. Based on this analysis, a Gross Pollutant Trap (GPT) was selected, and a concept design was completed. However, during detailed design and market engagement revealed that the GPT would not achieve the desired level of pollutant removal in significant rainfall events due to hydraulic challenges, coupled with site constraints.

In September 2025, due to technical constraints identified at Pump Station SP0038, Sydney Water submitted a Licence Variation Application proposing amendments to the wastewater screening delivery requirements. Under the current approved Authorisation (2024-2027) condition, construction and implementation is required to be completed by 31 December 2026. Sydney Water has proposed an amended condition requiring construction and implementation to commence by 31 December 2026; this proposed amendment is subject to AEO determination and has not yet been approved. In parallel, Sydney Water is progressing a design feasibility and constructability investigation for an alternative solution, with construction currently anticipated to commence in late 2026 (subject to approvals and final determination).

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3.4.6 EMP Action 4.3 – Maintain permanent signage at Foreshore Beach

Sydney Water is compliant with EMP Action 4.3.

Sydney Water and Sydney Airport will continue to maintain the signage and updates implemented in November 2024. These updates were documented in the Mill Stream Quarterly Report for Period 2 (1 January to 31 March 2025) and reaffirmed in the subsequent Period 3 report (1 April to 30 June 2025) (Figure 17, Figure 18).

The signage includes:

- QR codes linking to Beachwatch updates and Mill Stream information.
- Multi-language notifications.
- Interpreter service details.
- Permanent signage at Foreshore Drive Car Park and Mill Stream Lookout.

At the Mill Stream Stakeholder Reference Group (SRG) meeting on the 12 February 2025, Sydney Airport informed Sydney Water that they had engaged with several stakeholders regarding signage at Tower Beach, particularly in relation to recreational use. These stakeholders are collaboratively drafting revised signage to reflect current guidance for both Tower Beach and Botany Bay. Given the differences between the proposed Tower Beach signage currently in place at Mill Stream and Foreshore Beach, considering the proximity of these locations, Sydney Airport shared details of Sydney Water's signage with the NSW EPA in February 2025. This was done to

support EPA's review and ensure consistency across signage prior to finalising an update for Tower Beach (Figure 15).

Sydney Airport has noted that its primary concern relates to potential changes in the size of the signage. The most recent update provided by Sydney Airport was on the 17 October 2025. At the time, Sydney Airport had not received any further information from the EPA regarding updated fishing advice. It is understood that the EPA is aiming to provide this advice by early 2026. Sydney Airport has advised that it has received confirmation that the NSW Government's Beachwatch monitoring program will continue during the 2026 monitoring year.

Both organisations are preparing for potential changes based on new Fishing advice and Beachwatch updates. Sydney Water wishes to note that there is an ongoing issue of vandalism affecting the Sydney Water signage at Mill Stream Lookout (Figure 15).

In response, Sydney Water has engaged with Bayside Council and the NSW Port Authority regarding the replacement of the damaged pole at the lookout area. The NSW Port Authority confirmed that a contractor had reinstalled the pole and Sydney Water has updated the damaged sign with are placement sign (Figure 16).



Figure 15 : Sydney Airport Signage at Tower Beach- 14 Nov 2026



Figure 16: Damaged sign 3 June 2025 & Updated sign 10 January 2025







Figure 17: Mill Stream Signage showing QR codes & Interpreter Service Dec 2025



Figure 18: Mill Stream Map of Signage at Mill Stream Look out April 2025.

3.4.7 EMP Action 4.4 – Ensure all maintenance personnel and contractors are aware of threatened species fact sheets.

Sydney Water is compliant with EMP Action 4.4.

The EMP performance indicator "No impact to threatened bird species" is based on the absence of any observed or reported impacts to threatened bird species during overflow response, inspection and clean-up activities undertaken throughout the reporting period. No incidents, observations or complaints relating to impacts on threatened bird species were recorded. To support this outcome, Sydney Water maintains a dedicated Work Instruction for Mill Stream and Foreshore Beach wet weather clean-ups (D0001845.02). This document is accessible to all maintenance personnel and contractors and includes guidance on threatened species awareness and environmental safeguards to be applied during field activities (refer Appendix 5: D0001845.02 – Mill Pond/Foreshore Beach Material Harm Assessment).

3.4.8 EMP Action 4.5 – Store gross pollutants appropriately during clean-ups

Sydney Water is compliant with EMP Action 4.5.

Sydney Water manages the temporary storage of gross pollutants collected during overflow response and clean-up activities in accordance with its operational Work Instruction for Mill Stream and Foreshore Beach wet weather clean-ups (Appendix 5: D0001845.02 – Mill Pond/Foreshore Beach Material Harm Assessment). This

document outlines procedures to prevent secondary environmental impacts prior to removal and disposal, including requirements for collected solids to be bagged and placed on a temporary waterproof membrane where material is required to remain onsite for a short period (refer Figure 19). These procedures ensure that gross pollutants are handled in a controlled and environmentally appropriate manner and support the effective implementation of overflow clean-ups reported under Authorisation Condition 3p.

Document Update and Workshop Outcomes

On 4 July 2025, Sydney Water conducted an internal workshop focused on improving wet weather clean-up procedures for Mill Stream and Foreshore Beach. As a result of this workshop, an updated version to D0001845 has been completed. The new version D0001845.02 is currently in use.



Figure 19: Gros Pollutants stored onsite prior to removal

3.4.9 EMP Action 4.6 – Dispose of gross pollutants appropriately

Sydney Water is compliant with EMP Action 4.6.

During this reporting period, Sydney Water's operational staff adhered to the appropriate disposal process for waste collected after each clean-up. The bagged waste was periodically collected and removed from the site during the clean-ups. It was then transported to Sydney Water's depots and subsequently disposed of at an appropriate waste management facility as per D0001845.02.

3.5 EMP Objective 5 – Monitor wastewater system performance, odour and receiving waterway health

Sydney Water undertakes extensive monitoring of the wastewater network (Mill Stream ERS and associated assets), receiving waterway and air quality.

3.5.1 EMP Action 5.1 – Conduct continuous overflow monitoring and routine monthly reports (Condition 3a, 3b, 3c & 14)

Sydney Water is compliant with EMP Action 5.1 / Authorisation Conditions 3a, 3b, 3c and 14

Sydney Water monitored Mill Stream overflows in accordance with the requirements of the Environmental Management Plan (EMP) for the reporting period from 1 January 2025 to 31 December 2025. Monthly Overflow Reports for this period were submitted to the Airport Environment Officer (AEO) and relevant stakeholders, including Sydney Airport, Bayside Council and the Environment Protection Authority (EPA). Each report provides a summary of debris removed (in cubic metres) during clean-up activities, together with graphical representations of overflow levels and rainfall data. (Refer to Figure 20).

IICATS Sewer System alerts provided to the AEO for SG0035 are generated from Hydra Station 802310, which monitors the Southern Division Main (SWSOOS) at the Mill Stream overflow location. The remaining stations shown in Figure 20 (802063, 802064 and 802065) are used for system performance monitoring and reporting only.

During the reporting period, Sydney Water also monitored Emergency Relief Structure (ERS) gauge levels at four locations within the Sydney Airport precinct. These gauges are located at the Mill Stream overflow points (802063, 802064, 802065 and 802310) (Refer Figure 21).

The Mill Stream overflow is located on the Southern Division Submain sewer, immediately upstream of its connection to the South Western Sydney Ocean Outfall Sewer (SWSOOS). Due to this proximity, while the overflow structure is situated on a branch sewer, it also functions as a relief point for the SWSOOS main trunk sewer. (Refer Figure 1)

The graphs provided in this report present rainfall, overflow volume and sewer level data for the reporting period. For ease of reference, quarterly graphs are included in Appendix 7: Sydney Water Monitored ERS Gauge levels at Mill Stream Quarterly Periods Rainfall plots, Overflow Volumes and Sewer Levels. These plots include two traces representing Mill Stream conditions: the sewer carrier level and a flat-line trace indicating the overflow threshold. To demonstrate the hydraulic relationship with the main trunk sewer, the SWSOOS No. 1 level trace from nearby SP0038 is also shown, with an offset applied to account for differences in carrier elevations. The graphs also include two rainfall traces representing precipitation in the upstream catchment influencing the SWSOOS (Refer Figure 22).

As part of the preparation of this report, Sydney Water undertook a quality review of the data used for annual reporting. This review identified minor inconsistencies in previously extracted datasets. Following correction, reported discharge volumes for August 2025 and September 2025 were marginally lower, resulting in an overall

annual volume reduction of approximately 2 per cent (Refer to Appendix 1: Sewer Overflow Volume of Discharge (ML) estimate report Mill Stream (Botany Bay).

Note on Appendix 7 graph date ranges: Appendix 7 includes quarterly monitoring plots prepared from hydrometric data extracts generated during report preparation. Some plots show different end dates because the hydrometric reporting system did not allow extraction to the earlier mid-month reporting date being considered at the time. The nearest available full-month extraction range was therefore used for presentation purposes. This does not indicate any change to the underlying monitoring data, reporting methodology or compliance assessment.

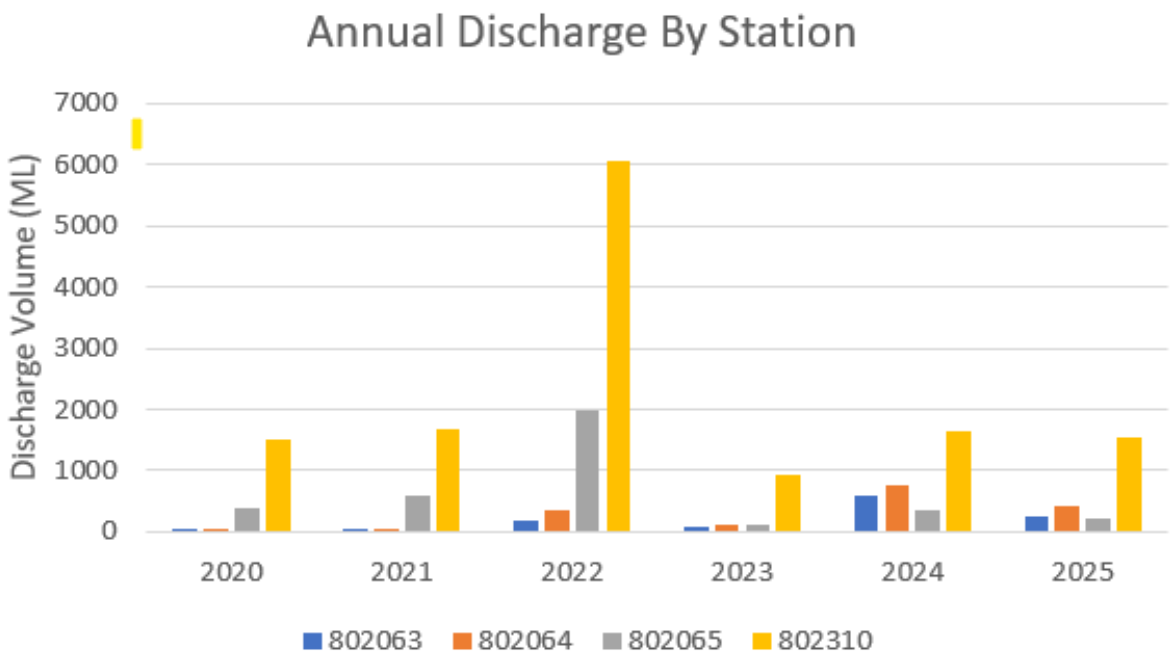


Figure 20: Annual Total Discharge (ML) per ERS Gauge

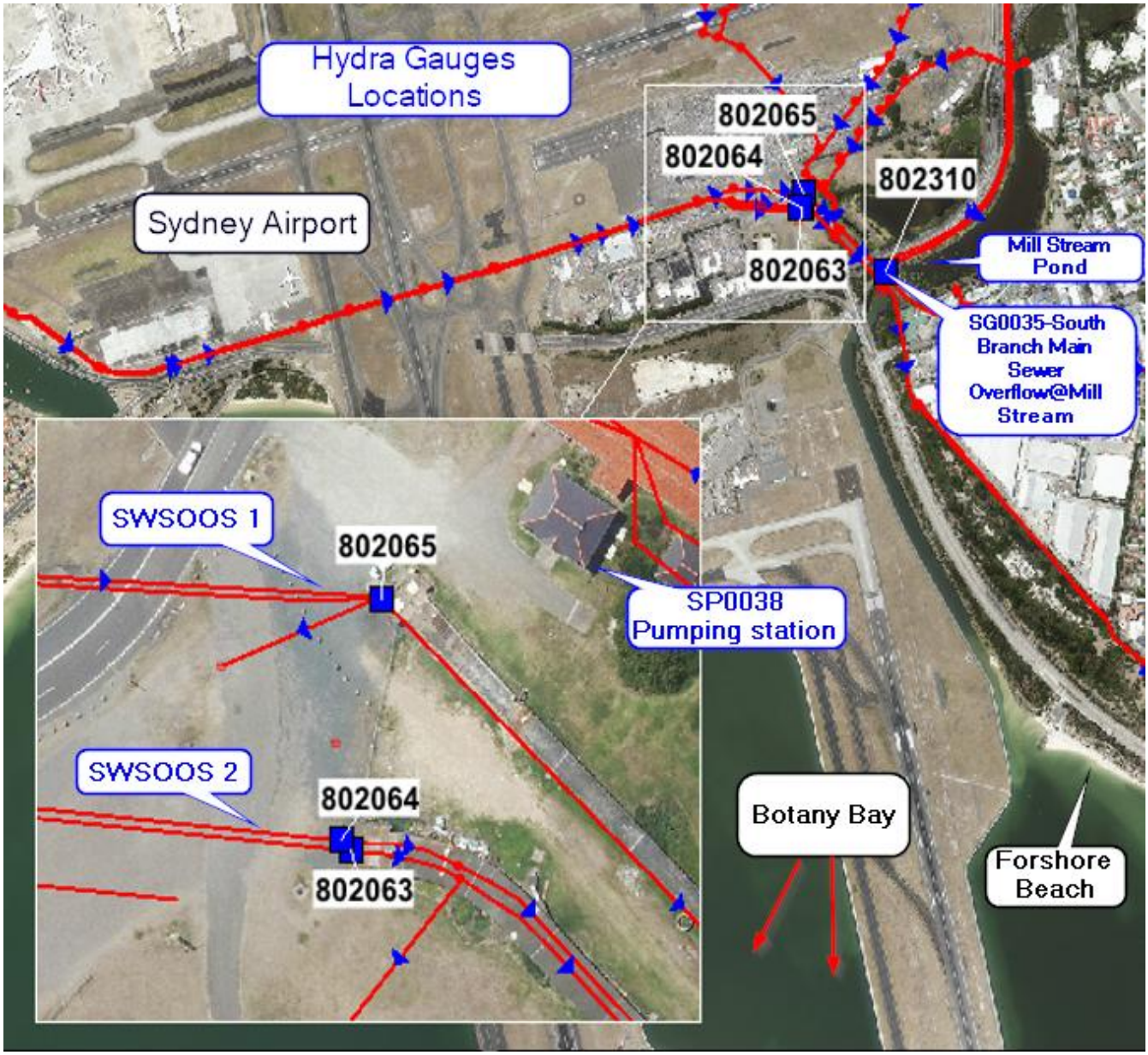


Figure 21: Mill Stream Gauge Sensor Locations Sydney Airport

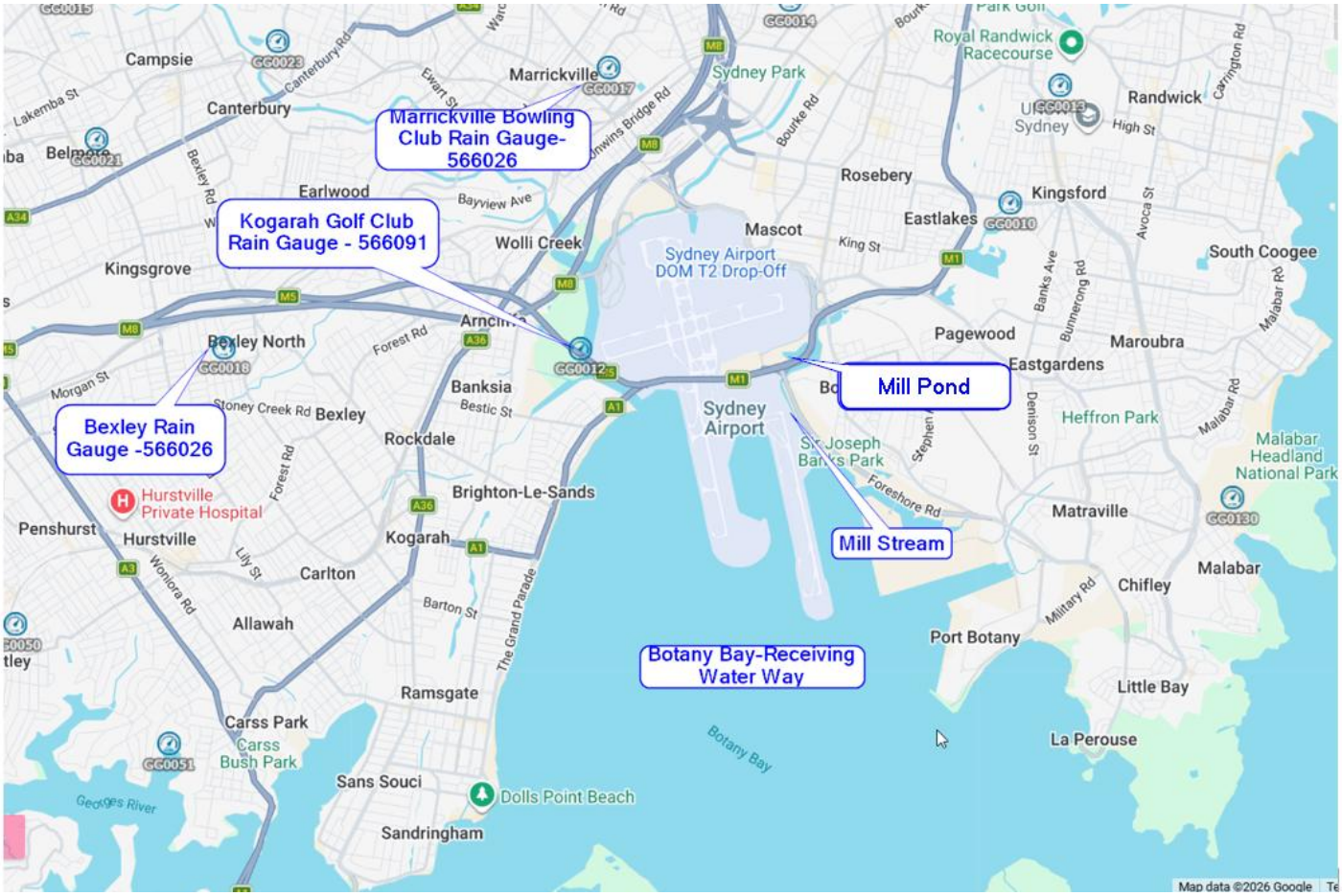


Figure 22: Mill Stream Rain Gauge Locations

EMP Action 5.2 – Provide overflow alerts to AEO and Sydney Airport representatives (Condition 12 & 13)

Sydney Water is compliant with EMP Action 5.2 / Authorisation Conditions 12 and 13.

Sydney Water provided relevant IICATS overflow alerts to Mill Stream stakeholders via email for the period 01 January 2025 to 31 December 2025.

At the Stakeholder Reference Group (SRG) meeting held on 23 July 2025, it was agreed that the Airport Environment Officer (AEO), Sydney Airport and Bayside Council would receive email alerts for SG0035 Bay Street overflow start and stop events. Sydney Airport and Bayside Council representatives also requested to continue receiving alerts for SP0038 (ERS 9393735 and ERS 8136185).

This alert distribution arrangement was revisited at the SRG meeting held on 23 October 2025 to support a shared understanding of the notification process and the rationale underpinning it. As a result, the recipient email notification list was updated (Refer to Table 8).

The contact list for overflow alerts was amended to include group email addresses rather than individual email addresses.

- AEO Sydney- aeosydney@infrastructure.gov.au
- Sydney Airport Environment - environment@syd.com.au,
- Bayside Council- millstreamsewage@bayside.nsw.gov.au
- Alerts generated by IICATS Sewer System and sent from -Sewer System <NO_ Reply_IICATS @sydneywater.com.au> Table 8

Table 8: IICATS Alert Email Stakeholder List

Stakeholder	IICAT Alert Overflow Started	IICAT Alert Overflow Stopped
AEO Sydney **Bayside Council** **Sydney Airport**	**Subject: SG0035 BAY ST overflow started** Message: SG0035 BAY ST overflow started at 10/09/2025 22:23 Email auto-generated by system Sent by: Name: S.BOTANY.SG0035 BAY ST.SG0035.SGS01.Level Alarm Time: 10/09/2025 22:23:17 Value: 1.475 m State: 4 High	**Subject: SG0035 BAY ST overflow stopped.** Message: SG0035 BAY ST overflow stopped at 13/09/2025 01:23 Email auto-generated by system Sent by: Name: S.BOTANY.SG0035 BAY ST.SG0035.SGS01.Overflow Ceased Alarm Time: 13/09/2025 01:23:00 Value: 1 State: ALARM
Sydney Airport **Bayside Council**	**Subject: SP0038 - SWOOS1 overflow started** Message: SP0038 - SWOOS1 overflow started at 10/09/2025 22:18 Email auto-generated by system Sent by: Name: S.BOTANY.SP0038 MASCOT.SX0038.LTX57.Level Alarm Time: 10/09/2025 22:18:47 Value: 1.7 m State: 4 High	**Subject: SP0038 - SWOOS1 overflow stopped** Message: SP0038 - SWOOS1 overflow stopped at 10/09/2025 22:28 Email auto-generated by system Sent by: Name: S.BOTANY.SP0038 MASCOT.SX0038.LTX57.Level Alarm Time: 10/09/2025 22:28:30 Value: 1.38 m State: Normal
Sydney Airport **Bayside Council**	**Subject: SP0038 - SWOOS2 N overflow started** Message: SP0038 - SWOOS2 N overflow started at 10/09/2025 22:06 Email auto-generated by system Sent by: Name: S.BOTANY.SP0038	**Subject: SP0038 - SWOOS2 N overflow stopped** Message: SP0038 - SWOOS2 N overflow stopped at 10/09/2025 23:39 Email auto-generated by system Sent by: Name: S.BOTANY.SP0038

	MASCOT.SX0038.LTX58.Level Alarm Time: 10/09/2025 22:06:14 Value: 2.01 m State: 4 High	MASCOT.SX0038.LTX58.Level Alarm Time: 10/09/2025 23:39:47 Value: 1.97 m State: 3 High
Sydney Airport **Bayside Council**	**Subject: SP0038 - SWOOS2 S overflow started** Message: SP0038 - SWOOS2 S overflow started at 10/09/2025 21:39 Email auto-generated by system Sent by: Name: S.BOTANY.SP0038 MASCOT.SX0038.LTX59.Level Alarm Time: 10/09/2025 21:39:09 Value: 1.99 m State: 4 High	**Subject: SP0038 - SWOOS2 S overflow stopped** Message: SP0038 - SWOOS2 S overflow stopped at 10/09/2025 22:17 Email auto-generated by system Sent by: Name: S.BOTANY.SP0038 MASCOT.SX0038.LTX59.Level Alarm Time: 10/09/2025 22:17:02 Value: 1.99 m State: 3 High

NB: multiple email alerts will be sent for ERS SP0038 sensors until overflows stop and SG0035 stops.

3.5.2 EMP Action 5.3 – Monitor the dry weather sewage capacity in the SWSOOS

Sydney Water is compliant with EMP Action 5.3.

Sydney Water monitors the wastewater level in the South Western Sydney Ocean Outfall Sewer (SWSOOS) in the vicinity of the Mill Stream overflows as a check for deterioration and/or improvement in system capacity over time. The performance measure used is the minimum wastewater level assessed against a threshold of 0.45 m over a rolling six-month period, in accordance with EMP Action 5.3. The gauge measuring sewer level (SG0035) is located in the SWSOOS (refer Figure 21).

Results are presented for the most recent rolling six-month period within the reporting year. Dry weather sewer level performance is monitored continuously and reported through the quarterly reports submitted during the year, with earlier data forming part of preceding rolling assessment periods.

The SG0035 gauge is connected by telemetry to the Sydney Water Integrated Instrumentation Control Automation and Telemetry System (IICATS), with flow depths captured and recorded at 15-minute intervals. The minimum wastewater level is used as it is not influenced by short-term fluctuations in wastewater depth associated with wet weather. Application of a rolling six-month period ensures that the assessment period is not dominated by wet weather conditions.

To simplify data presentation, only minimum daily values are presented in the raw data, as this measure directly reflects minimum dry weather levels for the rolling six-month period. The minimum dry weather sewer level recorded during the reporting period (1 August 2025 to 31 December 2025) was 0.352 m, recorded on 27 December 2025. Raw data is provided in Appendix 4: Dry Weather Sewer Level Daily Data- 6 monthly period (1 August 2025 to 17 January 2026).

3.5.3 EMP Action 5.4 – Monitor water quality at Mill Stream (Condition 3m, 3q, & 14)

Sydney Water is compliant with EMP Action 5.4 / Authorisation Conditions 3m, 3q and 14.

Sydney Water has undertaken water quality monitoring to assess potential impact of the ERS on the receiving waterway and identify pollutants of potential concern. This monitoring enables characterisation of the conditions against:

- Schedule 2 criteria of *Airports (Environment Protection) Regulations* 1997
- Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZG 2018)
- PFAS National Environmental Management Plan (NEMP) Version 3.0.

The fourth and final round of quarterly water quality monitoring was completed between 1 January 2025 and 31 March 2025. Detailed data analysis from all monitoring periods (2020, 2023, 2024 and 2025) was included in the final Water Quality Monitoring Report submitted to the AEO on the 31 July 2025 (**Error! Reference source not found.**), in compliance with condition 21(a) of the Authorisation. The AEO acknowledged receipt of the report on the 1 August 2025.

Overall, the results from the water quality monitoring program indicated that receiving water immediately downstream of Mill Pond Weir and the ERS was the most degraded in both wet weather overflow and dry weather conditions. Bacteria and nutrients (nitrogen and phosphorus) concentrations were the most influenced by the ERS discharge, with the highest concentrations immediately downstream of the ERS. Concentrations decreased with distance likely due to dilution, dispersion and decay.

Chlorophyll-α did not appear to be impacted by ERS overflows with concentrations consistently higher at the upstream site in both dry and wet weather.

There was minimal spatial variation in results for metals, organics, PFAS, sulphide and other physico-chemical parameters in dry and wet weather. This suggests less influence from specific ERS overflow events and likely reflective of the baseline stormwater condition and inputs.

The results from the water quality monitoring program have informed how Mill Stream overflows influence the receiving waterway and allowed characterisation against relevant guideline levels. However, there are opportunities to refine and improve the monitoring program design. The final report made a series of recommendations that should be considered for future monitoring programs:

- Monitor wet weather (rainfall) events without discharge from the Mill Stream ERS, to understand baseline stormwater conditions (without influence from Mill Stream overflows).
- Continue to assess water quality results against the current reference guideline levels (Schedule 2 and ANZG 2018).
- Review the current water quality parameters and collection methods.
- Investigate the possibility of standardised monitoring approaches for the routine (Environmental) and reactive (Emergency Response) monitoring programs to enhance the available data for analysis and

reporting. This would need to consider regulatory and resourcing requirements during incident/event sampling.

- Monitor different sized overflows, where possible. Larger events are required to collect ERS discharge samples (in-pipe wastewater quality), while smaller events cease before sampling teams can attend the site.
- Capture variation in receiving environment water quality in response to short and long overflow durations, and multiple events over the 5 monitoring days.

In response to the recommendations, Sydney Water will develop a targeted monitoring plan for implementation in 2026. A key focus of the monitoring will be to understand baseline receiving water quality during wet weather, i.e. no discharge from the ERS, to compare with receiving water quality during different sized overflow events. The suitability of the parameters monitored will also be reassessed prior to implementation of the monitoring plan.

3.5.4 EMP Action 5.5 – Air quality monitoring (H2S) near discharge location

Sydney Water is compliant with EMP Action 5.5 / Authorisation Condition 3d.

Sydney Water implemented continuous air quality monitoring to assess potential odour impacts associated with Mill Stream overflow events, in accordance with EMP Action 5.5. Monitoring targeted the summer period of 2024/25 and remained in place long enough to capture data during periods when overflows were occurring. The results of this program complement the odour monitoring previously undertaken in 2020/21. Monitoring focused on hydrogen sulphide (H_2S) concentrations at locations near the discharge point and surrounding sensitive receptors.

Continuous air quality monitors were installed on 18 September 2024 at three locations: upstream of the overflows near Botany Public School, at the Emergency Relief Structure (ERS) overflow, and near the Botany Container Terminal along Foreshore Drive (refer Figure 23 and **Figure 24**. Monitoring remained in place until 22 October 2025, with the program concluding on 28 October 2025 to ensure adequate coverage of overflow discharge conditions.

H_2S monitoring data prepared by Sydney Water were analysed for the period 1 September 2024 to 30 September 2025 and are presented in **Figure 25**. During this period, H_2S concentrations detected at all three monitoring locations were consistently low. Recorded levels were generally below 150 parts per billion (ppb) (0.15 parts per million) and dissipated to non-detectable levels within approximately 10 metres.

An isolated H_2S concentration of 0.21 ppm was recorded at the ERS overflow site; however, no corresponding elevated readings were detected downstream, indicating that the gas release dissipated locally. Conversely, a short-term H_2S concentration of 0.43 ppm recorded at the Mill Stream outlet near Foreshore Beach did not coincide with elevated readings at the ERS overflow site, indicating that the events were not directly linked.

Overall, the monitoring data indicate that H_2S emissions associated with Mill Stream overflows are minimal, localised and short-lived, with no measurable impact on surrounding areas. These findings inform Sydney Water's ongoing environmental risk assessments and operational planning.

The monitoring outcomes were documented in the *Mill Stream Odour Monitoring Report – September 2025* (Appendix 9: Mill Stream Odour Monitoring Report-September 2025) and provided to the Airport Environment Officer (AEO) on 26 September 2025. The findings and recommendations of the odour monitoring program were presented and discussed at the Stakeholder Reference Group (SRG) meeting held on 23 October 2025 (refer Table 11). Based on the consistently low hydrogen sulphide (H_2S) concentrations recorded during Phase 2 monitoring across all three monitoring locations, the Stakeholder Reference Group (SRG) endorsed the recommendation to discontinue odour monitoring and remove the equipment. Following the Stakeholder Reference Group (SRG) meeting, Sydney Water received written confirmation from both the Airport Environment Officer (AEO) and the NSW Environment Protection Authority (EPA) supporting cessation of the Mill Stream odour monitoring program. The EPA formally confirmed its agreement with the recommendation to discontinue monitoring and remove the monitors in correspondence dated 7 November 2025. In accordance with the Stakeholder Reference Group (SRG) endorsement and regulator confirmation, the odour monitoring program was concluded and the monitoring equipment removed.



Figure 23: Map of Sewer Overflow Odour Monitoring Location



M O/F Ambient is located at Foreshore Beach above the seawall



Mill Stream Outlet is located at the ERS Structure



Air West Fenceline is located between Botany Public School and Mill Pond (Upstream of ERS overflow)

Figure 24: Odour Monitoring Locatons-Foreshore Beach, ERS Structure, Upstream Botany Public School

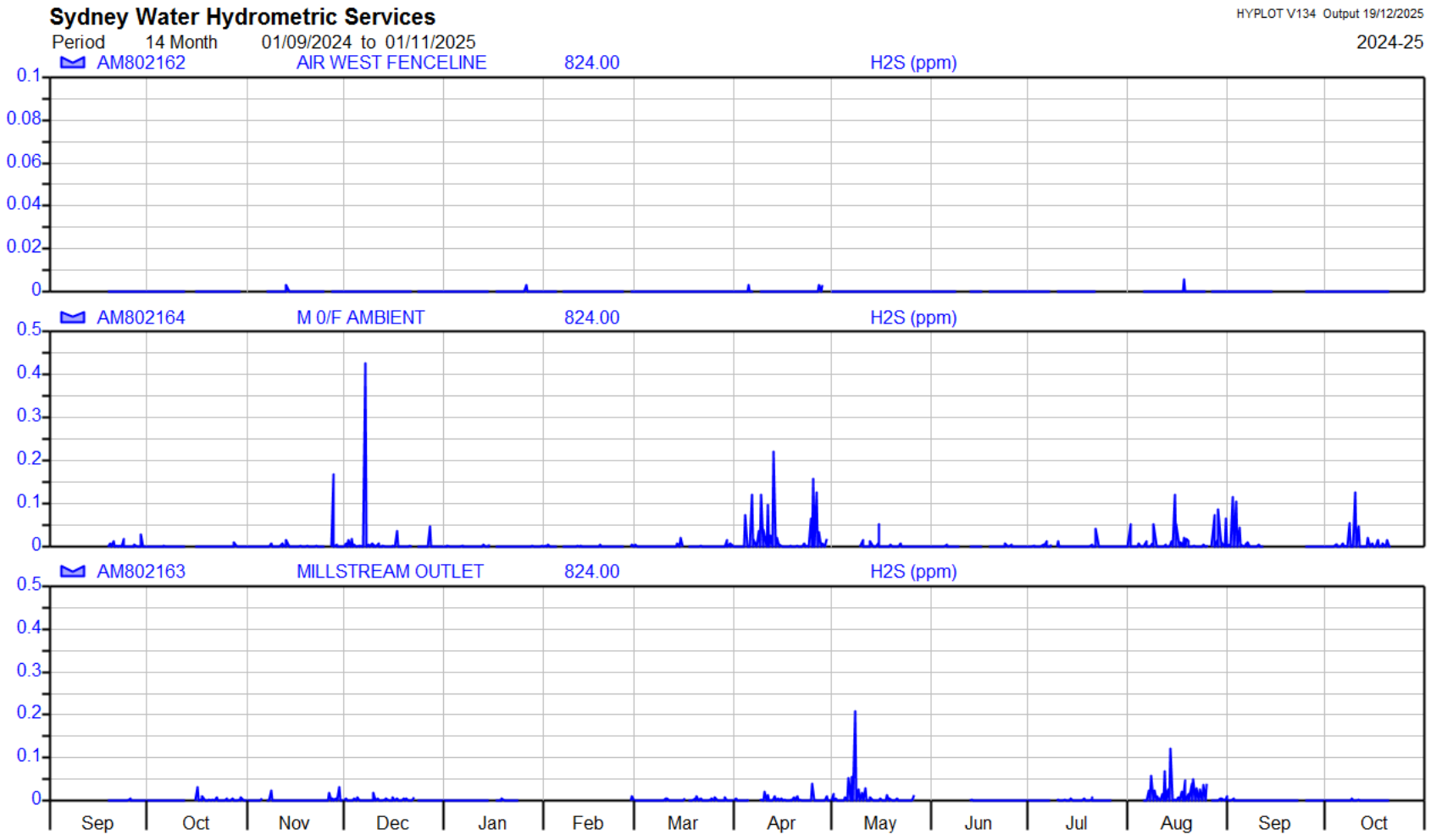


Figure 25: Hydrometrics Services Hydrogen Sulphide (H_2S) Sulphide odour monitoring reporting period

3.6 EMP Objective 6 – Conduct effective complaint management

3.6.1 EMP Action 6.1 – Respond to and investigate all complaints regarding the Mill Stream ERS (Condition 3d)

Sydney Water is compliant with EMP Action 6.1 / Authorisation Condition 3d.

Between 1 January 2025 and 31 December 2025, no noise or water complaints were received in relation to the Mill Stream Emergency Relief Structure. One odour-related enquiry was received on 16 May 2025 (SR 8004307407, Work Order 95046615). The complaint was located to the east of the Mill Stream ERS off Bay Street (Refer to Figure 26).

Follow-up actions for the odour enquiry raised on 7 January 2025 (CRM 8003962182), regarding the replacement of activated carbon media at the Sewer Odour Control Unit (SY0041), are provided in Table 9.

Table 9: Mill Stream Complaints

Sydney Water Reference	Date Complaint Received	Description	Sydney Water (SW) Resolution & Response
CRM-8003962182	7 Jan 2025	Waste Water-Odour Enquiry-Mascot-	**Follow up Action:** The activated carbon media at SY0041 was replaced on Friday, 5 December 2025. This occurred 11 months after the previous change on 10 January 2025. Typically, the carbon media is replaced every 12 months; however, Sydney Water brought the replacement forward in December 2025 to avoid potential issues during the Christmas and New Year holiday period, when staffing levels are lower. This ensured the unit remained in optimal working condition throughout the busy holiday season. Odour Concentration Measurement were conducted at the OCU on the 22 Dec 2025. Odour sample results confirmed that the OCU is operating very well following the media change. The calculated odour removal efficiency based on the sample is >99% and the outlet emissions are within specification at <500 ou.

			(Refer to Appendix 6: Odour Control Unit-Odour Concentration Measurement Report 22 results)
SR: 8004307407 Work Order 95046615	16 May 2025	Waste Water Odour Enquiry Botany St Botany	A Sydney Water Network Technician attended the site at 10:55 am on 16 May 2025. The nearby manholes associated with the odour enquiry were inspected, and no faults were found on Sydney Water assets. The crew observed contractors working in the area. The customer was informed of the investigation outcome.

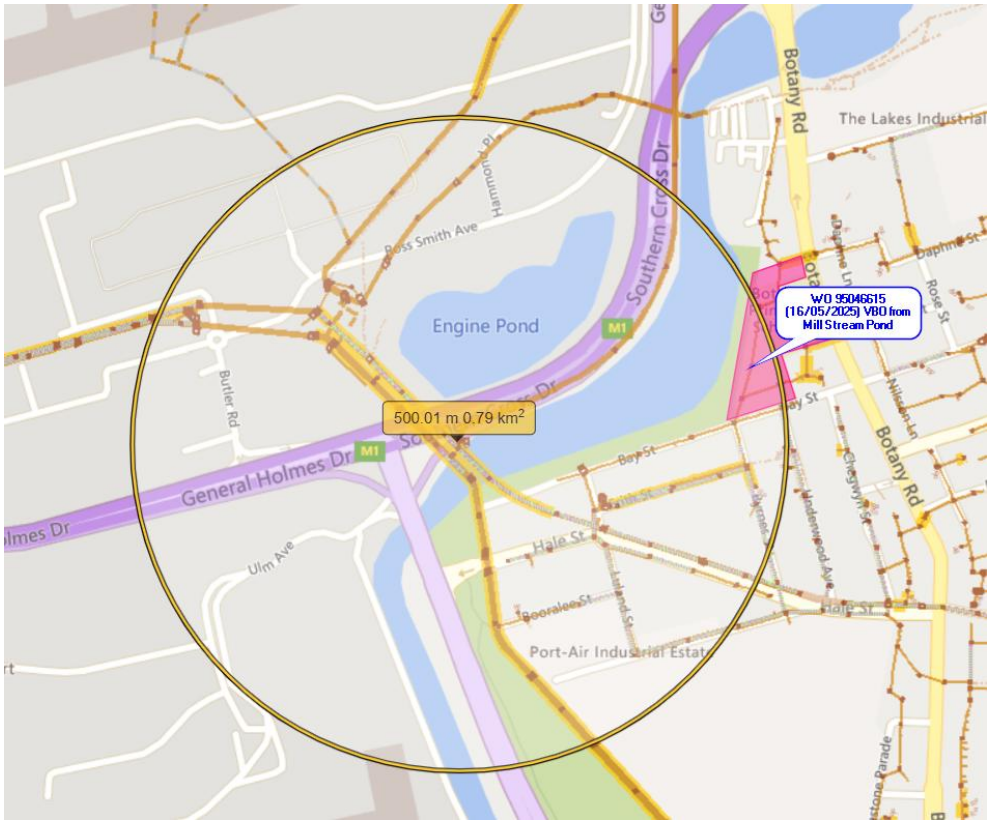


Figure 26: Odour Complaints around Mill Stream on 16 May 2025

Mill Stream Fish Kill Response Protocol Development – Workshop Summary

Following an incident in April 2025 involving a fish kill near Sydney Airport and Mill Stream, it became evident that gaps existed in communication and incident response procedures with Mill Stream stakeholders. As a proactive measure, Sydney Water and Sydney Airport engaged an independent external expert to facilitate a workshop aimed at developing a formal Fish Kill Response Protocol for future incidents.

The first workshop was held on 2 September 2025 and was attended by representatives from Sydney Airport, Sydney Water, and the Airport Environment Officers (AEO). The workshop was facilitated by Hydrobiology.

A Fish Kill Management Plan has since been prepared by Hydrobiology, and both Sydney Water and Sydney Airport are currently reviewing the document and reviewing incorporating the plan in with internal procedures.

3.7 EMP Objective 7 – Progress Reporting

3.7.1 EMP Action 7.1 - Provide Quarterly Update Report (Condition 7 & 8)

Sydney Water is compliant with EMP Action 7.1 / Authorisation Conditions 7 and 8.

Quarterly reports were completed by Sydney Water and shared with the Airport Environment Officer (AEO) and Sydney Airport as shown in Table 10.

Table 10: Summary of Sydney Water's Quarterly Report submission

Report Description	Date Sent	Submitted to
Mill Stream Quarterly Report No: 2- **Period: (1 January 2025 to 31 March 2025)**	**17 April 2025**	**Airport Environment Officer (AEO):** **Mariana Torres -** Assistant Director Airport Environment Officer-Sydney Airport (Mascot) • Environmental Regulation Section/Airport Environment Branch • Domestic Aviation and Reform Division mariana.torres@infrastructure.gov.au **Sydney Airport:** **Jake Atkins** - General Manager Environment and Sustainability jake.atkins@syd.com.au **Rhonda Lenardon** -Senior Manager Environment rhonda.lenardon@syd.com.au **Nicole Cheung** -Environment Manager-Major Projects nicole.cheung@syd.com.au
Mill Stream Quarterly Report No: 3 **Period:** **(01 April 2025 to 30 June 2025)**	**21 July 2025**	**AEO:** **AEO Group inbox** aeosydney@infrastructure.gov.au **Peter Goodier** – Airport Environment Officer-Sydney Airport (Mascot) • Environmental Regulation Section/Airport Environment Branch • Domestic Aviation and Reform Division

Report Description	Date Sent	Submitted to
		Julie Coughlan - Airport Environment Officer HUB Manager- Sydney Airport (Mascot) • Environmental Regulation Section/Airport Environment Branch • Domestic Aviation and Reform Division **Sydney Airport:** **Jake Atkins** - General Manager Environment and Sustainability jake.atkins@syd.com.au **Rhonda Lenardon** -Senior Manager Environment rhonda.lenardon@syd.com.au **Nicole Cheung** -Environment Manager-Major Projects nicole.cheung@syd.com.au
Mill Stream Quarterly Report No: 4 **Period:** **(1 July 2025 to 30 September 2025)**	**21 October 2025**	**AEO** aeosydney@infrastructure.gov.au **Peter Goodier –** Airport Environment Officer- Sydney Airport (Mascot) • Environmental Regulation Section/Airport Environment Branch • Domestic Aviation and Reform Division peter.goodier@infrastructure.gov.au **Julie Coughlan**- Airport Environment Officer HUB Manager- Sydney Airport (Mascot) • Environmental Regulation Section/Airport Environment Branch • Domestic Aviation and Reform Division julie.coughlan@infrastructure.gov.au **Sydney Airport:** environment@syd.com.au **Jake Atkins** - General Manager Environment and Sustainability jake.atkins@syd.com.au **Rhonda Lenardon** -Senior Manager Environment rhonda.lenardon@syd.com.au **Nicole Cheung** -Environment Manager-Major Projects nicole.cheung@syd.com.au
Mill Stream Quarterly Report No: 5 **Period:**	**30 Jan 2026**	Quarterly Report No. 5- Period 1 Oct 2025 to 31 Dec 2025 will be included in the Mill Stream EMP Compliance Report No. 2

Report Description	Date Sent	Submitted to
(1 October 2025 to 31 December 2025		

3.7.2 EMP Action 7.2 - Chair Quarterly Stakeholder Reference Group (SRG) meeting (Condition 16)

Sydney Water is compliant with EMP Action 7.2 / Authorisation Condition 16.

Between 1 January 2025 and 31 December 2025, Sydney Water chaired four quarterly Stakeholder Reference Group (SRG) meetings and one out of session SRG specifically to update stakeholders on IIPART funding. Further details are provided in Table 11. These meetings included representatives from Sydney Water, Sydney Airport, Bayside Council, the Port Authority of New South Wales, and the DITRDCSA.

Table 11: Stakeholder Reference Group Meeting Summary

Meeting	Date completed	Agenda
SRG	12 February 2025	Welcome and Introductions, New Authorisation and SRG, Authorisation conditions, EMP, Overflow discharges and response, Grit Pit Relocation Feasibility Study.
SRG	07 May 2025	Welcome and Introductions, Sydney Water's new structure post re-alignment update, IPART -Pricing process and outcomes of the determination, EMP Action Updates.
SRG	11 June 2025	Out of Session SRG - Welcome and Introductions, IPART - Pricing process and outcomes of the determination.
SRG	23 July 2025	Welcome and Introductions, Sydney Water's new structure post re-alignment update, IPART -Pricing process and outcomes of the determination, EMP Action Updates.
SRG	23 October 2025	Welcome and Introductions, Sydney Water's new structure post re-alignment update, IPART -Pricing process and outcomes of the determination, EMP Action Updates.

3.7.3 EMP Action 7.3 - Provide Annual EMP Compliance Report (Condition 2 and 4)

Sydney Water is compliant with EMP Action 7.3 / Authorisation Conditions 2 and 4.

EMP Action 7.3 relates to the requirement to prepare and submit the Annual EMP Compliance Report in accordance with Condition 2 of the Authorisation. Sydney Water submitted the Annual EMP Compliance Report

in accordance with the revised reporting timeframes approved by the Airport Environment Officer under Condition 2 of the Authorisation.

EMP Compliance Report No. 1

The Annual EMP Compliance Report No. 1 for the Mill Stream Authorisation was originally due on 31 January 2025. On 20 January 2025, Sydney Water submitted a formal request to the Airport Environment Officer (AEO) seeking an extension of the reporting deadline to 28 February 2025, for the reporting period 1 June 2024 to 17 January 2025.

As part of this request, Sydney Water also sought approval to reschedule the Community Stakeholder Meeting (Condition 9) to occur prior to 28 March 2025, and to provide copies of the finalised Annual EMP Compliance Report to Bayside Council and publish it online by 28 March 2025, in accordance with Condition 10 of the Authorisation.

On 24 January 2025, Sydney Water received written approval from the AEO, Cassandra Wadrop, confirming the extension to Conditions 2 and, 9 of the Mill Stream Authorisation 2024-2027. The request to vary Condition 10 was not approved, and compliance with that condition remained required by the 28 February 2025. Sydney Water complied with the revised approval and submission requirements and was therefore compliant with EMP Action 7.3 for the reporting period 1 June 2024 to 17 January 2025.

EMP Compliance Report No.2

As noted in Section 5 (Mill Stream Authorisation Variation Request), Sydney Water submitted a variation request on 26 September 2025 seeking amendments to Condition 2 of the Authorisation, which governs the timing and reporting periods for the Annual EMP Compliance Report (Appendix 8: Sydney Water Variation Request under Requirement 5.16(3) of the Airports (Environment Protection) Regulations 1997).

EMP Compliance Report No.2 As noted in Section 5 (Mill Stream Authorisation Variation Request), Sydney Water submitted a variation request on 26 September 2025 seeking amendments to Condition 2 of the Authorisation, which governs the timing and reporting periods for the Annual EMP Compliance Report. On 27 January 2026, and amended on 20 February 2026, the Airport Environment Officer (AEO), Peter Goodier, approved the requested variation under R*egulation 5.16 of the Airports (Environment Protection) Regulations 1997.* The approved variation amended the reporting schedule for Condition 2(b) as follows:

a) 31 January 2025 – covering the period from commencement of the Authorisation to 17 January 2025;
b) 28 February 2026 – covering the period 1 January 2025 to 31 December 2025;
c) 31 January 2027 – covering the period 17 January 2026 to 17 January 2027; and
d) 31 March 2027 – covering the period 17 January 2027 to 17 March 2027.

The variation took effect on the date of approval, and all other terms and conditions of the Authorisation remain unchanged and fully enforceable.

4 Additional Authorisation Conditions

4.1 Condition 3n (L7.1 Licence Compliance)

To comply with condition L7.1(a) to L7.1(d), Sydney Water implements a quality management system (QMS) certified to ISO 9001:2015 for the hydraulic sewer system modelling processes. Quality assurance includes surveillance audits for select procedures and a technical management review of all models. The Millstream sewer model (Botany catchment) being used to predict the overflows for the reticulation system was adjusted to reflect changes and recalibrated. The new model is checked for accuracy and classified in accordance with the accuracy achieved. The hydraulic sewer system model used for Millstream overflow performance reporting has no temporal or magnitude bias in either flow volume or water levels at the licence gauges as referenced in the document titled "PRP101.1 System Model Performance Indicators, September 2000" and subsequent modifications made by the Criteria Review Committee (Refer to Appendix 10: Mill Stream Water Quality Report 2025- Mill Stream WQ Report 2025.pdf , Mill Stream App 7.3 WQ raw data.xlsx).

4.2 Condition 3o & 18 (Bird Strike)

Sydney Water has complied with the Authorisation requirements by submitting the Bird Strike Risk Assessment letter to the Airport Environment Officer (AEO) on 30 August 2024, as required under Condition 18. Throughout the reporting period, Sydney Water maintained engagement with Sydney Airport and the AEO on bird strike risk through written correspondence and routine coordination associated with Mill Stream environmental management, monitoring and reporting activities..

This engagement included Sydney Airport's written response on 4 November 2024 outlining data concerns and referencing the National Airports Safeguarding Framework, followed by Sydney Water's written proposal for a meeting in early 2025 to align on risk assessment approaches. Internal discussions have continued within Sydney Water to refine technical positions and ensure consistent handling of Sydney Airport's feedback.

Sydney Water acknowledges the concerns raised by Sydney Airport and remains committed to constructive dialogue and collaborative risk management. Any further actions or changes to the approach for managing bird strike risk will be developed jointly with Sydney Airport and guided by regulatory requirements and direction from the AEO. Sydney Water will continue to implement improvements at Mill Stream in line with the Environmental Management Plan (EMP) and Authorisation conditions, ensuring all reporting and risk-management activities meet regulatory expectations.

4.3 Condition 6 (Shortcomings)

The calibrated model used for the Mill Stream overflow performance reporting in December 2024 was validated using the flow monitoring data captured for the period January 2025 to November 2025. The Mill Stream overflow performance reported from the model is within the target set in the EMP (13 overflow events in 10 years and overflow volume of 1238 ML/year). There are no shortcomings in the proposed EMP targets set and no corrective actions are required. Refer to Mill Stream overflow performance reporting (Appendix 11: An

Overview of Model Compliance with Condition L7.1-Millstream Overflow Performance Reporting Jan 2025 to Dec 2025 Ver1.pdf).

4.4 Condition 9 and 10 (Community meeting)

In 2025, Sydney Water held the Mill Stream community meeting on 27 February 2025, meeting Condition 9 of the Mill Stream Authorisation 2024–2027 and fulfilling our compliance obligations for the reporting period. The session was held at St Matts Anglican Church Hall in Botany and provided updates on the Environmental Management Plan (EMP) and key program milestones. Insights from the event showed that digital communication, particularly geotargeted social media advertisement, offers a more effective way to reach residents than traditional letterbox notifications, which formed the main focus of promotion in 2025 (with more than 6,000 invitations delivered). Key stakeholders were also invited, with representatives from Sydney Airport attending to support discussions on Mill Stream. Approximately 20 residents participated in the drop-in session. These results have informed the engagement approach for promoting the 2026 community meeting.

The 2026 Mill Stream community meeting was held on 29 January from 4pm to 7pm at St Matts Anglican Church Hall. This local drop-in session provided updates on work underway to improve the Mill Stream environment and invited participation from community members, residents and interested stakeholders.

To support broad awareness, residents were notified through geotargeted social media advertising and Bayside Council's online community channels, reaching over 11,500 people. Event details were also provided to the AEO, DITRDCSA, Bayside Council, Sydney Airport, the NSW EPA and the Port Authority of NSW on 22 January 2026.

The session included information on:

- Emergency relief structures
- Progress on the Environmental Management Plan including objectives, key actions and completed projects
- Information about both short term and longer-term plans for Mill Stream

Attendance at the 2026 session was low despite geotargeted promotion. Sydney Water staff were available to answer questions and capture community feedback, and attendees were encouraged to subscribe for future updates. The feedback received indicated that holding the event during the school holiday period contributed to reduced participation, noting that the 2025 session held in late February achieved higher engagement. Community feedback also highlighted a preference for an online format rather than a drop-in session, to improve accessibility for residents. These outcomes suggest an alternative format should be considered and that scheduling the session outside holiday periods is advised for 2027, subject to approval by the Department.

A copy of the annual EMP Compliance Report will be provided to Bayside Council by 28 February 2026 and uploaded to Sydney Water's website. Community members were able to register their interest at the event to receive an email notification once the report is available online.

4.5 Condition 14 (Providing reports to Sydney Airport)

Sydney Water is compliant with condition 14 and has completed and delivered all Mill Stream Monthly Overflow and Incident Reports, and the Mill Stream Quarterly EMP Compliance Reports were provided within the required 21-day timeframe following finalisation (Refer to Table 10 and Table 12).

Table 12: Sydney Water Report submission dates to Sydney Airport

Report	Report Period	Date of Submission	Recipient	Compliance Position
Mill Stream Monthly Overflow & Incident Report	January 2025 February 2025 March 2025 April 2025 May 2025 June 2025 July 2025 August 2025 September 2025 October 2025 November 2025 December 2025	14 February 2025 12 March 2025 8 April 2025 8 May 2025 24 June 2025 4 July 2025 6 August 2025 5 September 2025 9 October 2025 6 November 2025 4 December 2025 12 January 2026	AEOSydney aeosydney@infrastructure.gov.au Sydney Airport - Environment environment@syd.com.au Bayside Council millstreamsewage@bayside.nsw.gov.au EPA Matthew.Hart@epa.nsw.gov.au	Compliant on all submission dates

4.6 Condition 16 (Attending additional meetings)

In addition to SRG meetings, Sydney Water must attend meetings with Bayside Council, all Sydney Airport Community Forum meetings, and Planning and Coordination Forum meetings to which it is invited, and provide an update to those forums on the progress of the implementation of the EMP.

Sydney Water's Managing Director and senior executives met with the Sydney Airport Chief Executive Officer and senior executive team on 19 December 2025. The agenda included discussion of the IPART determination, the Long-Term Capital Operating Plan (LTCOP), the Sydney Airport Master Plan 2045, and matters concerning debris balls and bird-strike risk. The meeting also reaffirmed the collaborative working relationship between both organisations and their ongoing efforts to support implementation of the EMP.

4.7 Condition 19 (IPART Submission)

Condition 19 of Authorisation Number 01/2024 requires Sydney Water to submit an IPART price proposal in accordance with the requirements of the Independent Pricing and Regulatory Tribunal (IPART).

During the reporting period, Sydney Water submitted its price proposal for the 2025-30 determination period to IPART. The proposal was placed on public exhibition in accordance with IPART's statutory process and publicly available on the Sydney Water website under page titled *Our 2025–30 price proposal*.

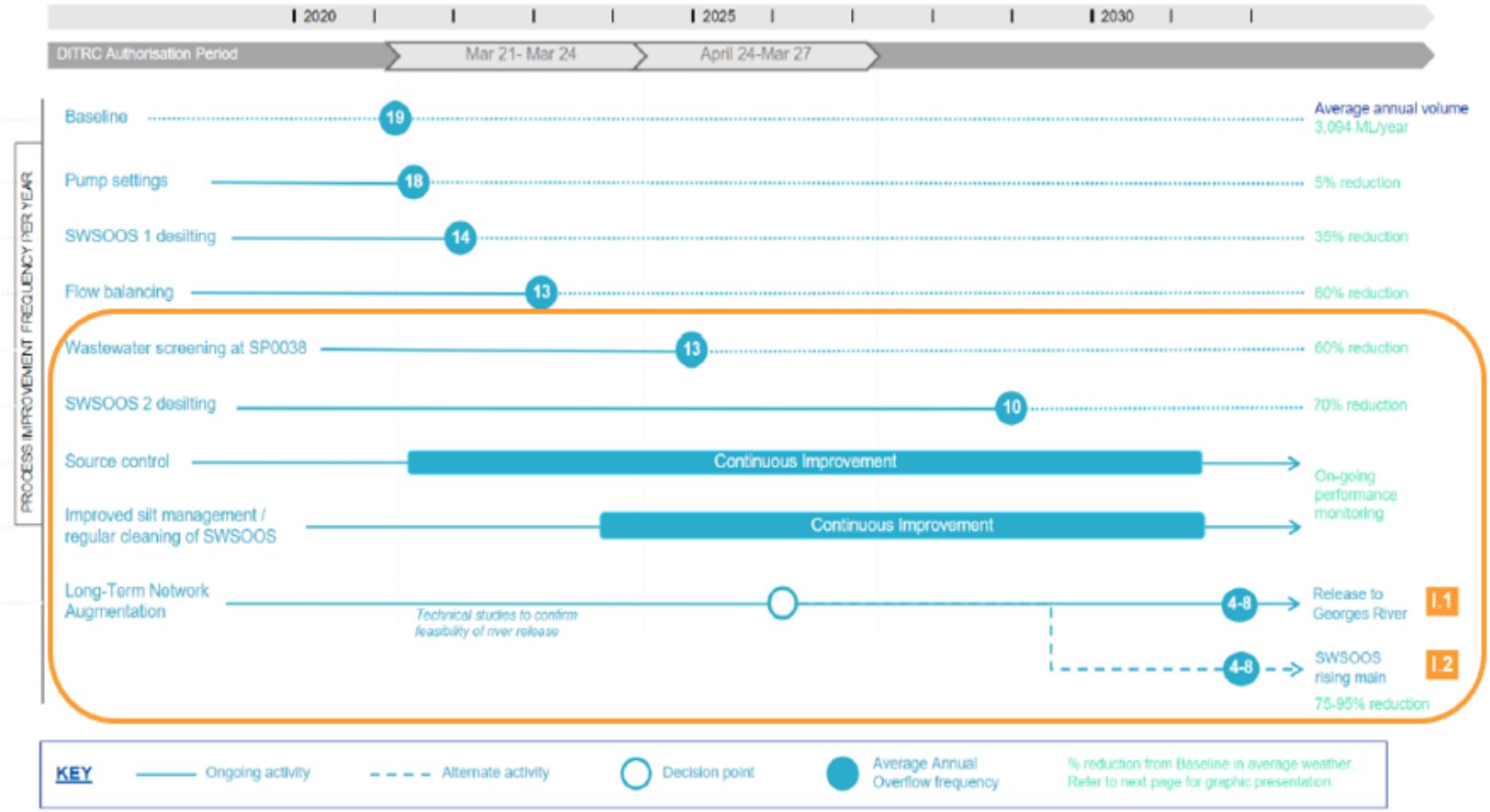
IPART's Final Report acknowledges Sydney Water's role in providing safe, reliable, and affordable water to a rapidly growing metropolitan region, and recognises the scale of complexity of the work required to maintain service outcomes. IPART also acknowledged that Sydney Water's expenditure during the previous determination period was both prudent and efficient. The Final report further recognises Sydney Water's increasing maturity in procurement and program delivery, particularly in relation to major growth projects and regional strategies. Sydney Water's customer engagement program, *Our Water, Our Voice*, was considered by IPART to demonstrate genuine and measurable progress, and the organization's long-term planning was acknowledged as supporting investment decision making and proposed expenditure aligned with the NSW Government's strategy to improve water security and system resilience.

IPART has made its Final Determination, setting Sydney Water's prices for the 2025–30 period, with new prices taking effect from 1 October 2025. For a typical four-person household with an annual water usage of 200 kilolitres, bills are expected to increase by $168, or 13.8 per cent inclusive of inflation, in the first year of the determination period. Over the subsequent four years, annual increases are expected to average $77, or 5.1 per cent per year, plus inflation. Over the five-year determination period, prices are forecast to increase by a total of 35.7 per cent, excluding inflation. IPART has set Sydney Water's total operating expenditure allowance at $9.4 billion and the total capital expenditure allowance at $13.2 billion for the determination period.

Sydney Water remains committed to ensuring that expenditure delivers value for customers. Following the Final Determination, Sydney Water is progressing work to prioritise planned expenditure, including finalising a prioritisation plan, seeking Board endorsement, and communicating the outcomes of this process with employees, customers and key stakeholders. An update on expenditure prioritisation is scheduled to be provided at the next SRG meeting in early March 2026.

Based on the submission of the price proposal in accordance with IPART requirements and the progression of activities following IPART's Final Determination, Sydney Water is compliant with Condition 19 of Authorisation Number 01/2024 for the reporting period (Refer to Figure 27).

Mill Stream – Plan on a Page



OFFICIAL: Sensitive

Figure 27: Mill Stream Plan on a Page

5 Mill Stream Authorisation Variation Request

On 26 September 2025, Sydney Water submitted a variation request for Mill Stream Authorisation No. 01/2025 to Ms Alpin at the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA). The request proposed amendments to Conditions 2, 9, 10, 20, 23 and 24 in Appendix A of the Authorisation.

The endorsed request outlined:

- the reasons for seeking the proposed variations,
- the period within which the variations were sought, and
- the associated proposed amendments to the Environmental Management Plan (EMP).

Further details of Sydney Water's variation request are provided in Appendix 8, submitted under Requirement 5.16(3) of the Airports (Environment Protection) Regulation 1997.
Compliance with the annual reporting requirements associated with Conditions 2 and 4 is addressed under this EMP Annual Compliance Report (refer Section 3.7.3 – EMP Action 7.3):

6 References

- Sydney Water Mill Stream Authorisation 2024 – 2027 - Appendix A Operating Conditions
- Sydney Water Mill Stream Environment Management Plan 2024-2027
- SW Document No: D0001845.02 Sydney Water Mill Stream/Foreshore Beach wet weather clean-up - Work instruction

.

7 Appendices

- **Appendix 1**: Sewer Overflow Volume of Discharge (ML) estimate report Mill Stream (Botany Bay)
- **Appendix 2:** Comparison of Monthly Totals for Wastewater Discharge and Rainfall at 2 local permanent rain gauges (Site ID 566026 and 566091)
- **Appendix 3:** Summary of Mill Stream Incident Responses during the reporting period
- **Appendix 4:** Dry Weather Sewer Level Daily Data- 6 monthly period (1 August 2025 to 17 January 2026)
- **Appendix 5:** D0001845.02 – Mill Pond/Foreshore Beach Material Harm Assessment
- **Appendix 6:** Odour Control Unit- Odour Concentration Measurement Report 22
- **Appendix 7:** Sydney Water Monitored ERS Gauge levels at Mill Stream Quarterly Periods Rainfall plots, Overflow Volumes and Sewer Levels

Note on graph date ranges and data presentation: Appendix 7 contains hydrometric plots prepared from different data extraction date ranges. As a result, some figures refer to 1 October 2025 to 1 January 2026, while others refer to 1 October 2025 to 1 February 2026. This reflects the available extraction ranges in the hydrometric reporting system at the time the plots were generated and does not represent a change to the underlying monitoring data, reporting methodology or compliance assessment. Rainfall traces are automatically scaled by the hydrometric reporting software to optimise readability for each figure. Differences in the apparent height or visual magnitude of rainfall peaks between figures may therefore reflect changes in graph axis scaling or figure presentation, rather than changes to the underlying rainfall dataset. At the time of extraction, Sydney Water was preparing the report using an earlier reporting period ending 17 January 2026. As the hydrometric reporting system did not allow extraction to that mid-month date, the nearest available full-month extraction range was used for presentation purposes. Any data displayed beyond the approved reporting period is therefore included for graph presentation only and has not been used to alter the compliance assessment.

- **Appendix 8:** Sydney Water Variation Request under Requirement 5.16(3)
- **Appendix 9:** *Mill Stream Odour Monitoring Report – September 2025*
- **Appendix 10**: Mill Stream Water Quality Report 2025 and Mill Stream App 7.3 WQ raw data.xlsx
- **Appendix 11**: An Overview of Model Compliance with Condition L7.1

7.1.1 Appendix 1: Sewer Overflow Volume of Discharge (ML) estimate report Mill Stream (Botany Bay)

Month	Description	SWSOOS 2 South Hydra Station NO. 802063	SWSOOS 2 North Hydra Station NO.802064	SWSOOS 1 Hydra Station NO.802065	Southern Division Main Hydra Station NO.802310	Total
Jan-25	**Volume (ML)**	**2.37**	**7.12**	**8.72**	**68.23**	**86.44**
	Duration (days)	3	5	6	7	7
	*Event Count (see note below table)	3	4	5	5	5
Feb-25	**Volume (ML)**	**0.00**	**0.49**	**1.55**	**17.12**	**19.16**
	Duration (days)	0	1	2	2	2
	*Event Count (see note below table)	0	1	2	2	2
Mar-25	**Volume (ML)**	**9.78**	**17.61**	**15.46**	**103.46**	**146.31**
	Duration (days)	2	4	4	4	4
	*Event Count (see note below table)	1	2	2	2	2
Apr-25	**Volume (ML)**	**3.83**	**7.58**	**7.64**	**74.99**	**94.04**

Month	Description	SWSOOS 2 South Hydra Station NO. 802063	SWSOOS 2 North Hydra Station NO.802064	SWSOOS 1 Hydra Station NO.802065	Southern Division Main Hydra Station NO.802310	Total
	Duration (days)	1	2	5	5	5
	*Event Count (see note below table)	1	2	1	2	2
May-25	**Volume (ML)**	**39.99**	**62.72**	**33.30**	**262.87**	**398.88**
	Duration (days)	5	8	7	13	13
	*Event Count (see note below table)	3	4	4	4	4
Jun-25	**Volume (ML)**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
	Duration (days)	0	0	0	0	0
	*Event Count (see note below table)	0	0	0	0	0
Jul-25	**Volume (ML)**	**25.02**	**36.37**	**24.46**	**125.21**	**211.05**
	Duration (days)	3	4	4	6	6
	*Event Count (see note below table)	2	2	2	2	2
Aug-25	**Volume (ML)**	**122.77**	**216.70**	**102.98**	**727.42**	**1169.87**

Month	Description	SWSOOS 2 South Hydra Station NO. 802063	SWSOOS 2 North Hydra Station NO.802064	SWSOOS 1 Hydra Station NO.802065	Southern Division Main Hydra Station NO.802310	Total
	Duration (days)	12	15	14	18	18
	*Event Count (see note below table)	4	4	4	4	4
Sep-25	**Volume (ML)**	**38.27**	**59.89**	**40.59**	**112.33**	**251.09**
	Duration (days)	2	3	2	3	3
	*Event Count (see note below table)	1	1	1	1	1
Oct-25	Volume (ML)	0.00	0.00	0.00	0.00	0.00
	Duration (days)	0	0	0	0	0
	*Event Count (see note below table)	0	0	0	0	0
Nov-25	Volume (ML)	0.00	0.15	0.03	8.14	8.32
	Duration (days)	0	1	1	3	3
	*Event Count (see note below table)	0	1	0	1	1
Dec-25	**Volume (ML)**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Month	Description	SWSOOS 2 South Hydra Station NO. 802063	SWSOOS 2 North Hydra Station NO.802064	SWSOOS 1 Hydra Station NO.802065	Southern Division Main Hydra Station NO.802310	Total
	Duration (days)	0	0	0	0	0
	*Event Count (see note below table)	0	0	0	0	0
Totals for period 1 Jan 2025 to 31 Dec 2025	**Volume (ML)**	**242.04**	**408.63**	**234.72**	**1499.77**	**2385.16**
	Duration (days)	**30**	**45**	**46**	**61**	**61**
	***Event Count (see note below table)**	**15**	**21**	**21**	**23**	**23**

**Note: regarding event Count Figures: Event Count and Duration are measured in whole days. Consecutive days of discharge are counted as one event. Events greater than 1 day apart are counted as separate events. If an event spans the end and start of a new month it is counted in the month within which the event ends.*

7.1.2 Appendix 2: Comparison of Monthly Totals for Wastewater Discharge and Rainfall at 2 local permanent rain gauges (Site ID 566026 and 566091)

Discharging Sewer: Receiving Water Body: Date:	SWSOOS 2S Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	SWSOOS 2N Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	SWSOOS 1 Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	Southern Division S/M (SWSOOS) Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	Marrickville Bowling Club 566026 Total Monthly Rainfall (mm)	Bexley 566091 Total Monthly Rainfall (mm)
Jan-25	2.37	7.12	8.72	68.23	152.50	150.00
Feb-25	0.00	0.49	1.55	17.12	79.00	30.00
Mar-25	9.78	17.61	15.46	103.46	122.00	130.00
Apr-25	3.83	7.58	7.64	74.99	123.50	112.00
May-25	39.99	62.72	33.30	262.87	168.00	205.50
Jun-25	0.00	0.00	0.00	0.00	13.50	6.00

Discharging Sewer: Receiving Water Body: Date:	SWSOOS 2S Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	SWSOOS 2N Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	SWSOOS 1 Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	Southern Division S/M (SWSOOS) Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	Marrickville Bowling Club 566026 Total Monthly Rainfall (mm)	Bexley 566091 Total Monthly Rainfall (mm)
Jul-25	25.02	36.37	24.46	125.21	128.50	123.00
Aug-25	122.77	216.70	102.98	727.42	327.50	325.50
Sep-25	38.27	59.89	40.59	112.33	104.50	109.00
Oct-25	0.00	0.00	0.00	0.00	19.00	22.50
Nov-25	0.00	0.15	0.03	8.14	62.50	51.00
Dec-25	0.00	0.00	0.00	0.00	20.50	19.00
Totals ML:	**242.04**	**408.63**	**234.72**	**1499.77**	**1321.00 mm**	**1283.50 mm**
Total Discharge ML for Reporting Period:		**2385.16 ML**				

Discharging Sewer: Receiving Water Body: Date:	SWSOOS 2S Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	SWSOOS 2N Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	SWSOOS 1 Overflow @ Sydney Airport Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	Southern Division S/M (SWSOOS) Mill Stream (Botany Bay) Total Daily Overflow Discharge (ML)	Marrickville Bowling Club 566026 Total Monthly Rainfall (mm)	Bexley 566091 Total Monthly Rainfall (mm)
1 Jan 2025-31 Dec 2025						

7.1.3 Appendix 3: Summary of Mill Stream Incident Responses during the reporting period

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
10 Jan 2025 to 22 Jan 2025	W)93606696	Yes	Yes	4.7	127	9	N/A	Job:93606696-IL02931 AR318423-10/01/25 AR318882-15/01/25 AR319065 18/01/25 AR319065-22/01/25 AR319140-23/01/25	Related Work Orders: 93606696-10/01/2025-Inspection 93616678-12/01/2025-Inspection superseded 93700663 17/01/2025 IL02957No Inspection superseded to IL02931 93611703 22/01/2025 Inspection Cancelled Crew onsite- superseded.
31 Jan 2025 carried over to Feb 2025	WO93820692 IL02994	Yes	*Yes	1.3	35	0	N/A	Job 93820692-IL02994 AR3195555-29/01/25	Related Work Orders(WO): 938515780-29/01/2025-Inspection 93820692-

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
									29/01/2025-Inspection superseded to 93616678 for Clean-up/Analytical results 93820674-8/02/2025-Inspection
January 2025 Totals		**5**	***2**	**6**	**162**	**9**	N/A		
1 Feb to 8 Feb 2025	WO93820692 IL02994 Carried Over	Yes	*	3.33	90	0	N/A	Job 93820692-IL02994 AR319880 - 05/02/25	Related Work Order (WO): Clean-up carried over from January 2025 IL02994 93820692-29/01/2025. 93929620-12/02/2025 Inspection-Incident closed no environmental harm declared 93953823-15/02/2025 Inspection- Incident closed no

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
									environmental harm declared
February 2025 Totals		**3**	*****	**3.33**	**90**	**0**	**N/A**		***** IL02994 31/01/2025 Carried Over
13 Mar 2025 to 14 Mar 2025	WO94171421 IL03146	Yes	Yes	0.50	14	0	N/A	Job 94171421-IL03146 AR322045-12/03/25 AR322349-17/03/25 AR322545-21/03/25	Related Work Orders(WO): 94171421-12/03/2025 Inspection
31 Mar 2025 ongoing into April 2025	WO94517266 IL03200	Yes	*Yes	1.85	50	0	N/A	Job 94517266-IL03200 AR323319-30/03/25 AR323320-31/03/25	Related Work Orders(WO): 94517266-30/03/2025-Inspection 94514808-30/03/2025-Inspection-superseded
March 2025 Totals		**3**	***2**	**2.37**	**64**	**0**	N/A		

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
January 2025 to March 2025 Totals		11	*4	11.70	316	9			*IL02994 31/01/2025 ongoing into Feb 2924 *IL03200 31 Mar 2025 ongoing into April 2025 Not counted in quarterly totals
31/03/2025-06/04/2025	WO94517266 IL03200	Yes	*	11.85	320	3	N/A	Job:94517266 IL03200 AR 323319 30/03/2025 AR 323320 31/03/2025 AR 323315 01/04/2025 AR 323307 2/04/2025	Clean up carried over from previous month Related Work Order(WO): WO 94545777 - 01/04/2025 WO 94562078- 01/04/2025- Superseded IL03200 94730291-IL03279- 23/04/2025- Superseded IL03200 9475027 IL03290- 27/04/2025- Superseded IL03200
29/04/2025-30/04/2025 continued into April 2025	WO94766226 IL03293	Yes	*Yes	2.59	70	1	Yes	Job 94766226 IL IL03293 AR 324697 29/04/2025 AR324863 30/04/2025	Related Work Order(WO): 94730291 23/04/2025- Inspection 94750247 27/04/2025- Inspection

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
									94772758 30/04/2025 -supersede to IL03293
April 2025 Totals		**4**	***1**	**14.44**	**390**	**4**	**Yes**		*IL03293 31/03/25 carried over to April
01/05/2025 - 06/06/2025 Continued from May 2025	WO94792637 IL03293	Yes	*	**5.81**	**157**	**3**	**Yes**	Job 94766226 IL IL03293 AR 324864 01/05/2025 AR 324965 02/05/2025 AR 325398 09/05/2025 AR 325755 14/05/2025	Related Work Order(WO): 94778825 01/05/2025 - Inspection 94792637 03/05/2025 – Inspection
25/05/2025 - 26/05/2025	WO95165195 Superseded into IL0393	Yes	N/A					All FST Sampling under IL03293 Job 95165195 IL03416 AR 326330 25/05/2025 Job 94766226	Related Work Order(WO): 95165195 25/05/2025 -Superseded into IL03293 95170321 26/05/2025 - Superseded into IL03293

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
								IL IL03293 AR 326770 02/06/2025 – superseded into IL03293	WO95188660-27/05/2025-13:35 NO onsite No Material Harm WO Cancelled WO95207751 28/05/2025-14:07 NO onsite No Material Harm WO Cancelled WO95217679 29/05/2025 12:01 NO onsite No Material Harm WO Cancelled
May 2025 Totals		**9**	*	**5.81**	**157**	**3**	**Yes**		*IL03293 31/03/25 carried over to May
June 2025 Totals		0	0	0	0	0	N/A		NO MATERIAL HARM INCIDENTS
April 2025 to June 2025		**13**	***1**	**20.26**	**547**	**7**	**Yes**		*2 incident clean-ups carried over for April and May 25
03/07/2025-10/07/2025	WO95568811	Yes	Yes	2.11	57	2	Yes	Job: 95568811 IL03591 AR-328567	Related Work Order (WO)

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
from May 2025	IL03591							03/07/2025 AR-328568 05/07/2025 AR-328615 06/07/2025 A-328624- 07/07/2025 AR-328879 11/07/2025	WO95568811 - 3/07/2025 Operational WO95565336 03/07/2025 Closed-Superseded-WO9556881 IL03591 Operational WO95599248 Closed-superseded into existing clean-up WO9556881 IL03591 3/7/2025
31/07/2025 to 02/09/2025	WO9582686 7 IL03694	Yes	*Yes					Job 95826867 IL03694 AR-329937 31/07/2025	Related Work Order(WO): WO95826867 superseded into IL03694 31/7/2025
July 2025 Totals		4	*2	2.11	57	2	Yes		*IL03951 & IL03694 carried over
31/07/2025 to 2/09/2025 carried over	WO95826867 IL03694	Yes	*	68.56	1851	25	Yes	Job 95826867 IL03694 AR-330232 01/08/2025 AR-330233 02/08/2025	Related Work Order (WO) Operational Incident WO95887006 6/8/2025 Closed-Superseded into

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
								AR-330234 03/08/2025 AR-331526 31/08/2025 AR-332093 09/09/2025	95858822-IL03694 2/8/2025 Operational Incident WO95887006 6/8/2025 WO95887010 6/8/2025 WO95926870 12/8/2025 WO95926870 12/8/2025 WO95933033 13/8/2025 WO95953905 16/8/2025 WO96105342 24/8/2025 WO95858822-2/8/25 superseded into WO95568811-II03591 Superseded for FST Sampling WO95826867-IL3694-31/7/2025
August 2025 Totals		**6**	**0**	**68.56**	**1851**	**25**	**Yes**		
31/07/2025 to 2/09/2025 carried over	WO95826867 IL03694			0.37	10	0	N/A	Job 96242381 IL03885 AR-332494	Related Work Order: WO96243658 IL03893 13/09/2025

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
								12/09/2025 AR-332565 15/09/2025 AR-332566 16/09/2025 AR-333006 25/09/2025	
September Totals 2025		**2**	**0**	**43.96**	**1187**	**25**	**Yes**		
July to September 2025 Totals		**12**	**2**	**114.63**	**3095**	**52**	**Yes**		
October Totals 2025		**0**	**0**	**0**	**0**	**0**	**N/A**		NO MATERIAL HARM INCIDENTS
23/11/2025-27/11/2025	WO96844445 IL04087	Yes	Yes	5.44	147	1	Yes	Job No.9684445 FST Analytical Report Job 336216 sampling 24/11/2025 FST Analytical Report Job 336217	Related Work Order WO96726780-4/11/2025- NO Material Harm 96844445 23/11/2025

Date Range	Incident Reference	Inspection	Clean-up	Gross Pollutants removed m3	No. of bags of material removed	Syringes removed	Debris Balls Observed	Analytical Report (AR) Field Sampling Dates	Comments
								sampling 25/11/2025 FST Analytical Report Job 336288 sampling 26/11/2025	
November 2025 Totals		2	1	5.44	147	1	Yes		
December 2025 Totals		0	0	0	0	0	N/A		NO MATERIAL HARM INCIDENTS
October to December 2025 Totals		2	1	5.44	147	1			
January 2025 to December 2025 Totals		38	8	34.21	152.03	1			

7.1.4 Appendix 4: Dry Weather Sewer Level Daily Data- 6 monthly period (1 August 2025 to 17 January 2026)

***Sewer level at SG0035-Minimum value highlighted in green**

Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value
1/08/2025	0.8224	1.0707	1.3201	13/08/2025	0.7844	1.0221	1.2271	25/08/2025	0.7581	0.9575	1.1451
2/08/2025	1.1065	1.2322	1.3259	14/08/2025	1.0205	1.2383	1.3334	26/08/2025	0.6592	0.899	1.13
3/08/2025	1.2062	1.2699	1.3485	15/08/2025	1.1346	1.2082	1.2857	27/08/2025	0.7869	0.9794	1.1296
4/08/2025	1.2053	1.265	1.3305	16/08/2025	0.7733	0.9986	1.1858	28/08/2025	0.7252	0.9404	1.1054
5/08/2025	0.8882	1.0873	1.276	17/08/2025	0.5818	0.8639	1.0642	29/08/2025	0.6856	0.9125	1.0596
6/08/2025	0.8762	1.05	1.2506	18/08/2025	0.7111	1.019	1.3282	30/08/2025	0.6393	0.8972	1.0234
7/08/2025	0.7403	0.9873	1.1681	19/08/2025	1.2073	1.2426	1.3349	31/08/2025	0.5792	0.8626	1.0344
8/08/2025	0.7231	0.9289	1.2692	20/08/2025	1.2071	1.2748	1.3827	1/09/2025	0.5953	0.8538	1.0272
9/08/2025	1.2185	1.2686	1.3445	21/08/2025	1.2702	1.3277	1.3709	2/09/2025	0.7188	0.8968	1.0298
10/08/2025	1.2107	1.2613	1.3145	22/08/2025	1.2246	1.2715	1.3416	3/09/2025	0.6042	0.8496	1.0228
11/08/2025	1.2071	1.2854	1.3287	23/08/2025	1.2051	1.2723	1.333	4/09/2025	0.5923	0.8189	1.0115
12/08/2025	0.8585	1.0958	1.2807	24/08/2025	0.8885	1.0959	1.2913	5/09/2025	0.5811	0.8177	0.9872

Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value
6/09/2025	0.5584	0.8216	0.9736	22/09/2025	0.5707	0.8407	1.0617	8/10/2025	0.5258	0.7554	0.9428
7/09/2025	0.5339	0.8099	0.9936	23/09/2025	0.6216	0.8544	1.0542	9/10/2025	0.5063	0.7372	0.9188
8/09/2025	0.561	0.8157	1.0095	24/09/2025	0.5809	0.8137	1.0113	10/10/2025	0.5034	0.7432	0.9016
9/09/2025	0.5981	0.8246	1.0022	25/09/2025	0.5703	0.8078	0.9866	11/10/2025	0.4815	0.7455	0.8891
10/09/2025	0.5811	1.0717	1.548	26/09/2025	0.5672	0.8055	0.9659	12/10/2025	0.4571	0.7301	0.9122
11/09/2025	1.2483	1.319	1.3996	27/09/2025	0.5391	0.7964	0.9371	13/10/2025	0.4747	0.7259	0.9463
12/09/2025	1.1643	1.2313	1.2874	28/09/2025	0.5048	0.7743	0.9427	14/10/2025	0.4868	0.7472	0.9113
13/09/2025	0.7538	0.9802	1.1643	29/09/2025	0.5343	0.7703	0.9738	15/10/2025	0.4852	0.7201	0.9418
14/09/2025	0.6009	0.8546	0.9988	30/09/2025	0.5438	0.7846	0.9653	16/10/2025	0.5002	0.7273	0.928
15/09/2025	0.5538	0.8356	1.0967	1/10/2025	0.5435	0.7693	0.9583	17/10/2025	0.502	0.7314	0.9126
16/09/2025	0.7083	0.9198	1.0863	2/10/2025	0.5289	0.7497	0.9319	18/10/2025	0.4718	0.7335	0.8797
17/09/2025	0.6414	0.8923	1.0696	3/10/2025	0.5192	0.7462	0.913	19/10/2025	0.4453	0.7222	0.9246
18/09/2025	0.6367	0.8666	1.0443	4/10/2025	0.4948	0.744	0.9027	20/10/2025	0.4777	0.7343	0.9334
19/09/2025	0.6301	0.8696	1.0263	5/10/2025	0.4883	0.7256	0.8813	21/10/2025	0.4842	0.7163	0.9185
20/09/2025	0.7561	0.938	1.0096	6/10/2025	0.4732	0.7204	0.9436	22/10/2025	0.4838	0.7236	0.9227
21/09/2025	0.5522	0.8388	1.0151	7/10/2025	0.5117	0.7422	0.9473	23/10/2025	0.4835	0.713	0.8962

Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value
24/10/2025	0.4714	0.7154	0.8785	9/11/2025	0.4532	0.7396	0.9155	25/11/2025	0.5572	0.7832	0.9877
25/10/2025	0.4542	0.7165	0.8694	10/11/2025	0.4712	0.7328	0.9298	26/11/2025	0.5112	0.7902	0.9825
26/10/2025	0.429	0.7014	0.8944	11/11/2025	0.4854	0.7064	0.9008	27/11/2025	0.5214	0.7327	0.9619
27/10/2025	0.4725	0.7167	0.9171	12/11/2025	0.4643	0.735	0.9224	28/11/2025	0.5208	0.7278	0.9031
28/10/2025	0.4623	0.6953	0.9219	13/11/2025	0.4844	0.7293	0.8864	29/11/2025	0.4814	0.7254	0.8781
29/10/2025	0.4791	0.8668	1.1104	14/11/2025	0.4833	0.7164	0.9015	30/11/2025	0.4493	0.7029	0.9011
30/10/2025	0.4006	0.6539	0.9887	15/11/2025	0.4668	0.7539	1.0063	1/12/2025	0.4761	0.7153	0.9227
31/10/2025	0.3647	0.6441	1.0174	16/11/2025	0.4565	0.7517	0.9279	2/12/2025	0.4721	0.7045	0.9198
1/11/2025	0.7318	0.9407	1.1707	17/11/2025	0.4742	0.7408	0.9277	3/12/2025	0.4768	0.6993	0.9137
2/11/2025	0.3613	0.6474	0.8659	18/11/2025	0.4775	0.7103	0.9306	4/12/2025	0.4943	0.7312	0.905
3/11/2025	0.5145	0.8422	1.2938	19/11/2025	0.4864	0.7201	0.9216	5/12/2025	0.4859	0.7233	0.8861
4/11/2025	0.5872	0.7985	1.2022	20/11/2025	0.4898	0.7186	0.901	6/12/2025	0.4579	0.7307	0.873
5/11/2025	0.5372	0.7855	0.9456	21/11/2025	0.4718	0.7053	0.8775	7/12/2025	0.4335	0.7015	0.886
6/11/2025	0.5155	0.7576	0.9242	22/11/2025	0.4543	0.7471	1.2433	8/12/2025	0.468	0.6995	0.8829
7/11/2025	0.5031	0.7318	0.8985	23/11/2025	0.6525	1.0233	1.2537	9/12/2025	0.4575	0.7153	0.8814
8/11/2025	0.4782	0.7474	0.8991	24/11/2025	0.5325	0.8108	1.0157	10/12/2025	0.4785	0.6872	0.907

Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value	Calendar Date	Minimum Result Value	Average Result Value	Maximum Result Value
11/12/2025	0.5193	0.7312	0.8889	27/12/2025	0.352	0.6357	0.8201				
12/12/2025	0.5401	0.8835	1.1897	28/12/2025	0.3886	0.6262	0.8146				
13/12/2025	0.3542	0.636	0.8061	29/12/2025	0.4182	0.6431	0.8542				
14/12/2025	0.6499	0.7599	0.8312	30/12/2025	0.441	0.665	0.8508				
15/12/2025	0.4716	0.6979	0.9209	31/12/2025	0.4413	0.6724	0.8397				
16/12/2025	0.5008	0.7079	0.8823								
17/12/2025	0.4964	0.714	0.9103								
18/12/2025	0.5087	0.7224	0.8913								
19/12/2025	0.4979	0.7557	0.968								
20/12/2025	0.3721	0.6942	0.9406								
21/12/2025	0.4866	0.7817	0.9402								
22/12/2025	0.5115	0.7256	0.8844								
23/12/2025	0.4805	0.7189	0.8669								
24/12/2025	0.4718	0.7084	0.8604								
25/12/2025	0.4365	0.6469	0.8387								
26/12/2025	0.3693	0.5976	0.7842								

7.1.5 Appendix 5: D0001845.02 – Mill Pond/Foreshore Beach Material Harm Assessment



Take care to keep away from threatened bird species and their nests, particularly between August and January – see page 3

Network Operator

Assess for material harm two hours each side of low tide. See page 4 for guidance regarding 'material harm'.

Assess areas A-B-C-D. Check for solids, syringes, debris balls and dead fish. Install signs and danger tape and locate on clean-up plan. Take photographs (use timestamp app). An incident must be declared for regulator reporting

- If there is new ***Material Harm*** (see page 4) call the Dispatcher to declare a Material Harm incident.
- **OTHERWISE -** Declare an ***Operational incident*** (e.g. clean-up is not required, or a clean-up is in progress from a previous incident)



Areas requiring clean-up					
A		B		C	

Area 'A' is usually worst affected

Take care to keep away from threatened bird species and their nests, particularly between August and January – see page 3

Clean-up Crews

Work can start at high tide and continue till 2-hours after low tide. Prioritise syringe removal.

In the areas marked above, gather and bag any sewage solids (debris balls, wet wipes, plastics, ear buds, sanitary products, syringes etc). Pay attention to debris wrapped around rocks, and small plastic items in the seaweed at the high tide line. Full bags to be temporarily stored on a waterproof membrane (e.g. tarp) – see page 3.

Daily email update - count and photograph (with timestamp), syringes, debris balls and rubbish bags collected. Also count bags removed / left on site. If solids collected using plant, estimate of the cubic metres of waste removed.
Email to environmentalregulation@sydneywater.com.au

Gather and bag any sewage solids.
Full bags to be temporarily stored on a waterproof membrane (e.g. tarp) and enclosed in a temp fence.



Install signs and danger tape and locate on clean-up plan. Take photographs (use timestamp app).



Take care to keep away from threatened bird species and their nests, particularly between August and January

Pied Oystercatcher





Little Tern





MATERIAL HARM - Page 4/4

There is Material Harm if you find any <u>dead fish</u> OR any <u>debris balls</u> (can be black, grey or white).





There is Material Harm if you find any of the following in quantities that are <u>too much to collect in full as you conduct the material harm assessment (one bag)</u> and further clean-up is required.



Condoms



Sanitary Pad



Debris



Wet Wipes



Syringe



Syringe

7.1.6 Appendix 6: Odour Control Unit- Odour Concentration Measurement Report 22

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ABN: 87 102 255 765

Odour Concentration Measurement Report

Sampling and Laboratory Information

Organisation	Sydney Water Corp	Telephone	+61 401 701 635
Contact	M. Kacprzak	Email	michael.kacprzak@sydneywater.com.au
Sampling Site	Mascot, NSW	Sampling Personnel	Sydney Water Corporation
Sampling Method	AS/NZS 4323.3	Laboratory Location	Mascot, NSW

Order and Project Information

Order requested by	M. Kacprzak	Order accepted by	A. Schulz
Date of order	25.11.2025	TOU Project #	N1604-01
Order number	Refer to Correspondence	Project Manager	A. Schulz
Signed by	M. Kacprzak	Panel Operator	A. Schulz

Investigated Item	Odour concentration in odour units 'ou', determined by sensory odour concentration measurements, of an odour sample supplied in a sampling bag. Samples were analysed as received from the client and/or The Odour Unit. Results relate specifically to the samples as received.
Identification	The odour sample bags were labelled individually. Each label recorded the testing laboratory, sample number, sampling location (or identification), sampling date and time, dilution ratio (if dilution was used) and whether further chemical analysis was required.
Method	The odour concentration measurements were performed using dynamic olfactometry according to the Australian/New Zealand Standard: Stationary source emissions – *Part 3: 'Determination of odour concentration by dynamic olfactometry* (AS/NZS 4323.3). The odour perception characteristics of the panel within the presentation series for the samples were analogous to that for butanol calibration. Any deviation from the Australian standard is recorded in the 'Comments' section of this report.
Measuring Range	The measuring range of the olfactometer is $2^2 \leq \chi \leq 2^{16}$ ou. If the measuring range was insufficient the odour samples will have been pre-diluted. The machine is not calibrated beyond dilution setting 2^{17}. This is specifically mentioned with the results.
Environment	The measurements were performed in an air- and odour-conditioned room. The room temperature is maintained at 22 °C ±3 °C.
Measuring Dates	The date of each measurement is specified with the results.
Instrument Used	The olfactometer used during this testing session was: TOU-OLF-004
Laboratory Precision	The precision of this laboratory (expressed as repeatability) for sensory quality must be $r \leq 0.477$ in accordance with the AS/NZS 4323.3. $r = 0.135$ Compliance – Yes
Laboratory Accuracy	The accuracy of this laboratory for sensory quality must be $A \leq 0.217$ in accordance with the AS/NZS 4323.3. $A = 0.208$ Compliance – Yes
Lower Detection Limit (LDL)	The LDL for the olfactometer has been determined to be 16 ou, which is 4 times the lowest dilution setting.
Traceability	The results of the tests, calibrations and/or measurements included in this document are traceable to Australian/national standards. The assessors are individually selected to comply with fixed criteria and are monitored in time to keep within the limits of the standard. The results from the assessors are traceable to primary standards of n-butanol in nitrogen. Note Disclaimers on last page of this document.

Accredited for compliance with ISO/IEC 17025 - Testing.
This report shall not be reproduced, except in full.

Date: Monday, 12 January 2026 Panel Roster Number: SYD20251222_122

NATA
Accreditation Number: 14974

A. Schulz
Authorised Signatory

THE ODOUR UNIT

Accreditation Number: 14974

Odour Sample Measurement Results
Panel Roster Number: SYD20251222_122

Sample ID / Location	Laboratory ID	Sampling Date & Time	Analysis Date & Time	Panel Size	Valid ITEs	Final Odour Concentration (ou)
SYD041 - Outlet #1	SC25964	22/12/2025 0930 - 0938 hrs	22/12/2025 1406 hrs	6	12	114
SYD041 - Outlet #2	SC25965	22/12/2025 1032 - 1040 hrs	22/12/2025 1443 hrs	6	12	102
SYD041 - Inlet #1	SC25966	22/12/2025 0930 - 0938 hrs	22/12/2025 1513 hrs	6	12	139,000
SYD041 - Inlet #2	SC25967	22/12/2025 1032 - 1040 hrs	22/12/2025 1538 hrs	6	12	147,000

Samples Received in Laboratory – From: SWC (M. Kacprzak) Date: 22/12/2025 Time: 1220 hrs

Note: The following are not covered by the NATA Accreditation issued to The Odour Unit:

1. The collection of samples by a method that is not prescribed by AS/NZS 4323.3.
2. Final results that have been modified by the dilution factors where parties other than The Odour Unit have performed the dilution of samples.

THE ODOUR UNIT

Accreditation Number: 14974

Odour Panel Calibration Results

Reference Odorant	Reference Odorant Panel Roster Number	Concentration of Reference gas (ppb)	Panel Target Range for n-butanol (ppb)	Measured Concentration (ou)	Measured Panel Threshold (ppb)	Does this panel calibration measurement comply with AS/NZS 4323.3 (Yes / No)
n-butanol	SYD20251222_122	46,000	$20 \leq \chi \leq 80$	724	64	Yes

Comments

Odour characters (non-NATA accredited) as determined by odour laboratory panel:

Sample ID / Location	Laboratory ID	Odour Character
Outlet #1	SC25964	musty, cabbage
Outlet #2	SC25965	slight cabbage
Inlet #1	SC25966	rotten egg
Inlet #2	SC25967	rotten egg

Disclaimers

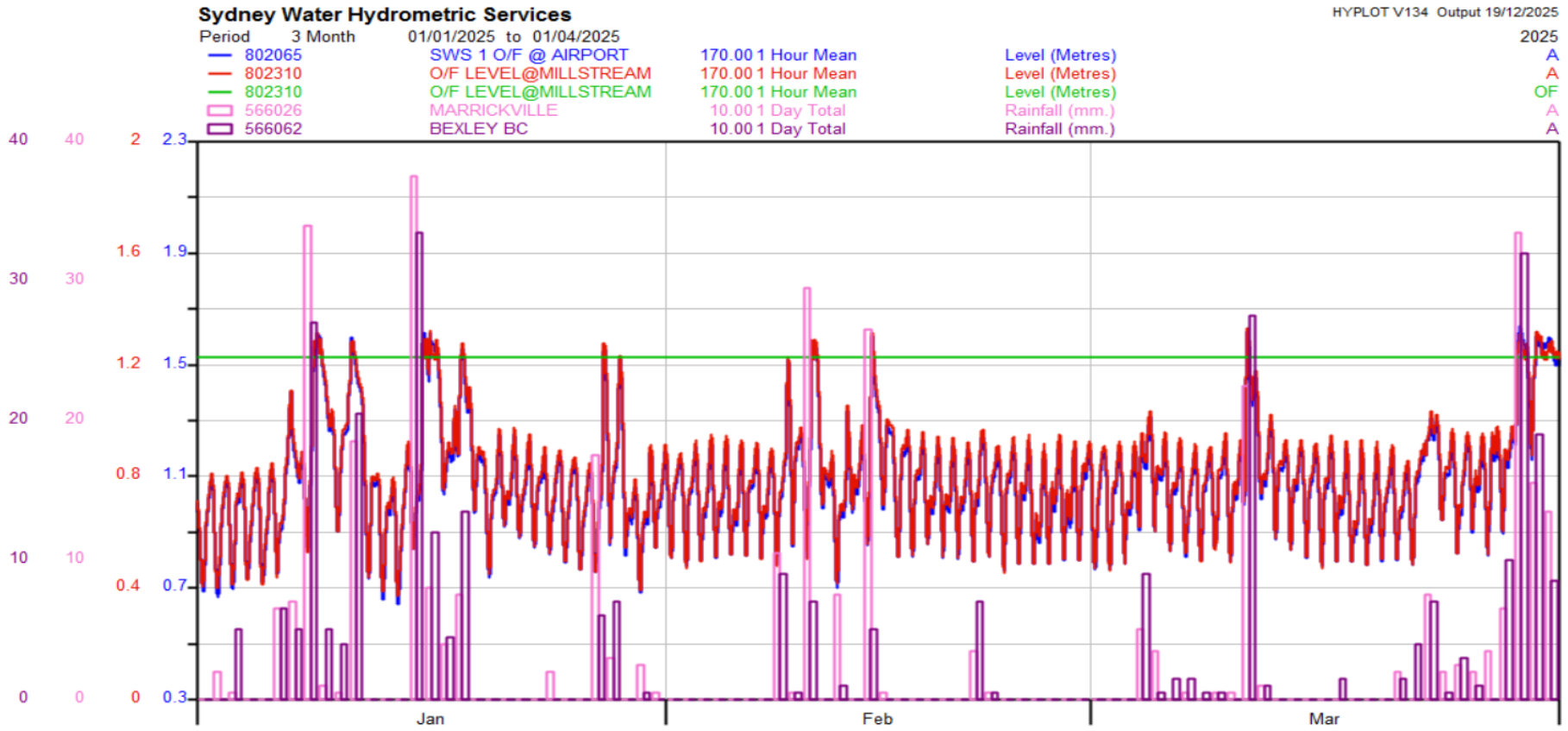
1. Parties, other than The Odour Unit, responsible for collecting odour samples have advised that they have voluntarily furnished these odour samples, appropriately collected and labelled, to The Odour Unit for the purpose of odour testing.
2. The collection of odour samples by parties other than The Odour Unit relinquishes The Odour Unit from all responsibility for the sample collection and any effects or actions that the results from the test(s) may have.
3. Any comments included in, or attachments to, this Report are not covered by the NATA Accreditation issued to The Odour Unit.
4. This report shall not be reproduced, except in full, without written approval of The Odour Unit.

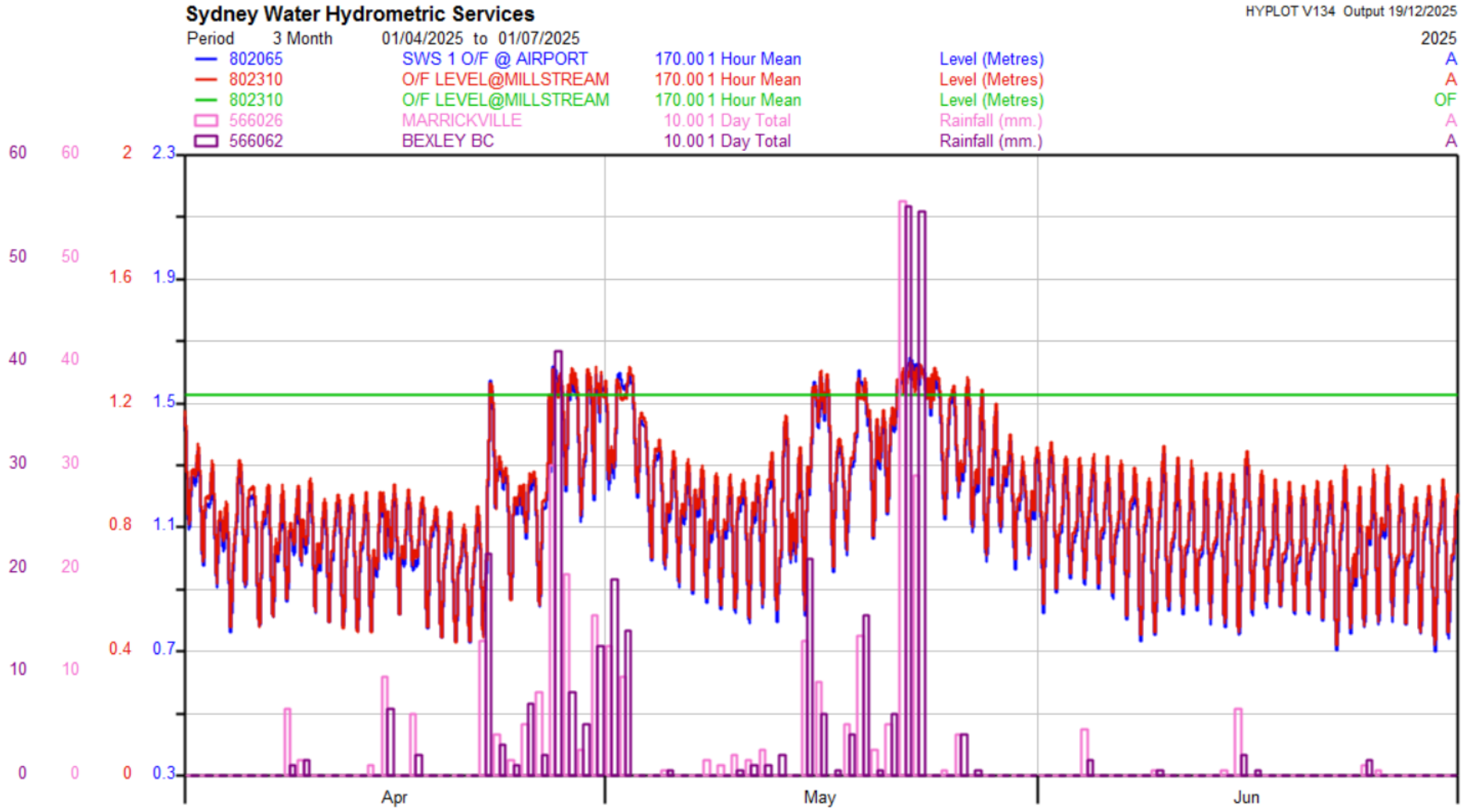
Report Status

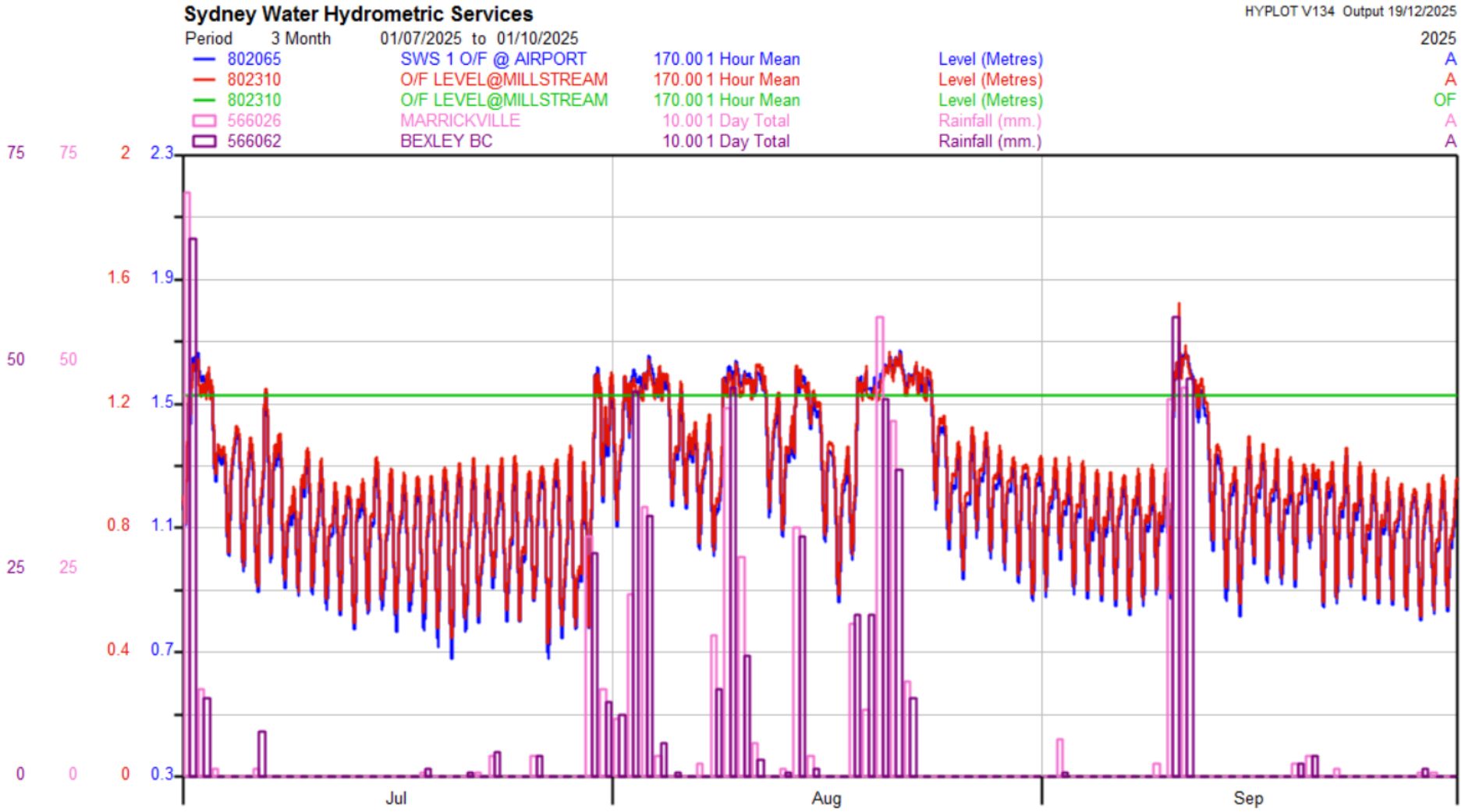
Status	Version	Prepared by	Date	Checked by	Date	Change	Reason
Final	1.0	A. Schulz	12/01/2026	M. Assal	12/01/2026	--	--
Revised	1.1	I. Farrugia	16/01/2026	--	--	Dates on *Analysis Date & Time* column	Dates corrected

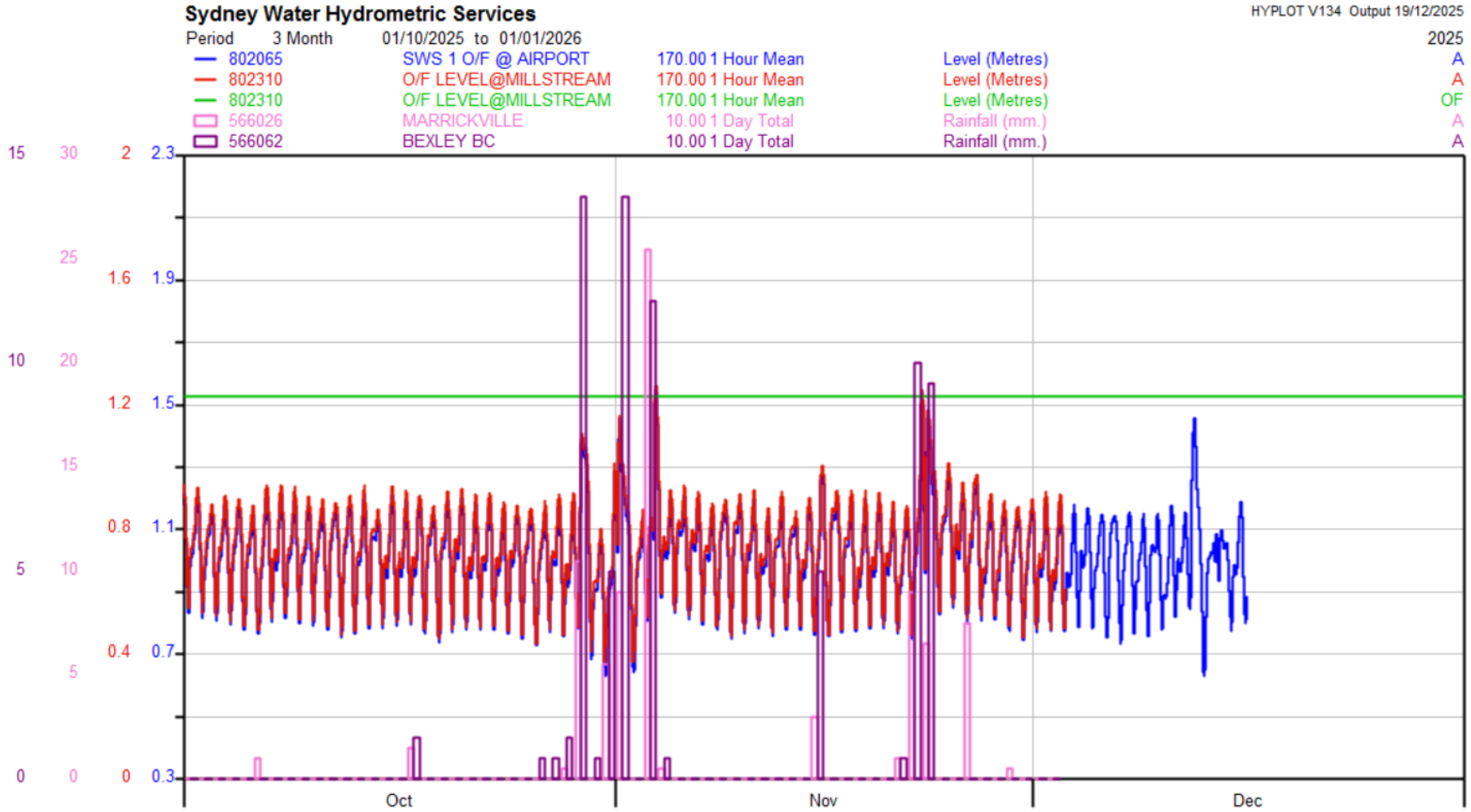
END OF DOCUMENT

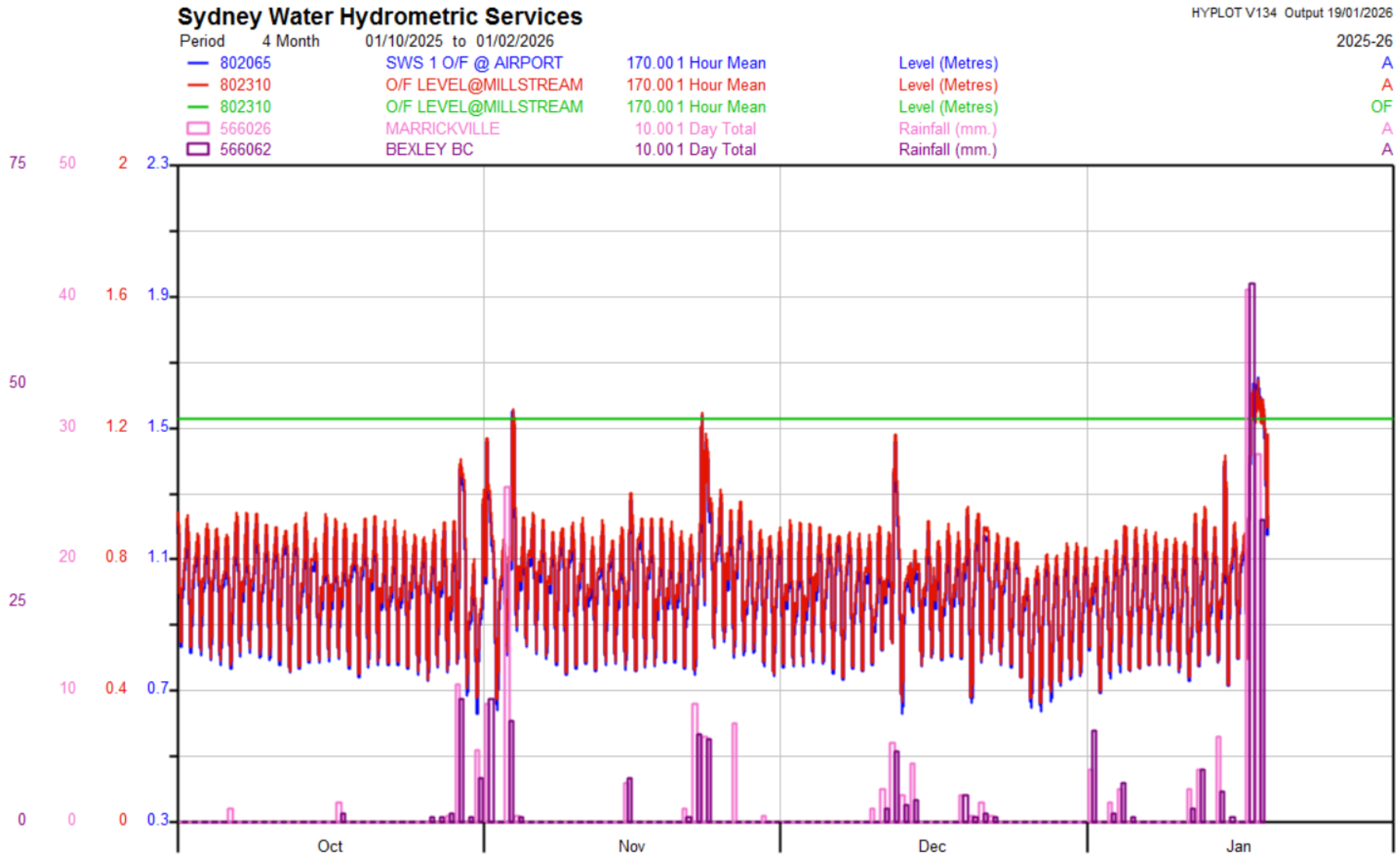
7.1.7 Appendix 7: Sydney Water Monitored ERS Gauge levels at Mill Stream Quarterly Periods Rainfall plots, Overflow Volumes and Sewer Levels




Sydney Water Hydrometric Services
HYPLOT V134 Output 19/12/2025
Period 3 Month 01/04/2025 to 01/07/2025
2025
802065 SWS 1 O/F @ AIRPORT 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) OF
566026 MARRICKVILLE 10.00 1 Day Total Rainfall (mm.) A
566062 BEXLEY BC 10.00 1 Day Total Rainfall (mm.) A
60 60 2 2.3
50 50 1.6 1.9
40 40 1.2 1.5
30 30 0.8 1.1
20 20 0.4 0.7
10 10
0 0 0 0.3
Apr
May
Jun


Sydney Water Hydrometric Services
HYPLOT V134 Output 19/12/2025
Period 3 Month 01/07/2025 to 01/10/2025
2025
802065 SWS 1 O/F @ AIRPORT 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) OF
566026 MARRICKVILLE 10.00 1 Day Total Rainfall (mm.) A
566062 BEXLEY BC 10.00 1 Day Total Rainfall (mm.) A
75 75 2 2.3
1.6 1.9
50 50 1.2 1.5
0.8 1.1
25 25
0.4 0.7
0 0 0 0.3
Jul
Aug
Sep


Sydney Water Hydrometric Services
HYPLOT V134 Output 19/12/2025
Period 3 Month 01/10/2025 to 01/01/2026
2025
802065 SWS 1 O/F @ AIRPORT 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) OF
566026 MARRICKVILLE 10.00 1 Day Total Rainfall (mm.) A
566062 BEXLEY BC 10.00 1 Day Total Rainfall (mm.) A
15 30 2 2.3
25 1.6 1.9
10 20 1.2 1.5
15 0.8 1.1
5 10 0.4 0.7
5
0 0 0 0.3
Oct
Nov
Dec


Sydney Water Hydrometric Services
HYPLOT V134 Output 19/01/2026
Period 4 Month 01/10/2025 to 01/02/2026
2025-26
802065 SWS 1 O/F @ AIRPORT 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) A
802310 O/F LEVEL@MILLSTREAM 170.00 1 Hour Mean Level (Metres) OF
566026 MARRICKVILLE 10.00 1 Day Total Rainfall (mm.) A
566062 BEXLEY BC 10.00 1 Day Total Rainfall (mm.) A
75 50 2 2.3
40 1.6 1.9
50
30 1.2 1.5
20 0.8 1.1
25
10 0.4 0.7
0 0 0 0.3
Oct
Nov
Dec
Jan

7.1.8 Appendix 8: Sydney Water Variation Request under Requirement 5.16(3) of the Airports (Environment Protection) Regulations 1997

Sydney WATER

Variation Request under Regulation 5.16(3) of the *Airports (Environment Protection) Regulations 1997*

Condition No.	Approved condition	Proposed amended condition (changes in red)	Reason variation is sought	Proposed update to Environmental Management Plan (EMP)	Period for which the variation is needed
2(b)	Annual EMP Compliance Report to the AEO by 31 January 2026, covering the period from 17 January 2025 to 17 January 2026	Annual EMP Compliance Report to the AEO by 28 February 2026, covering the period from 01 January 2025 to 31 December 2025	Sydney Water collects data in quarterly periods, with the fourth quarter of the year ending on 31 December. By reporting to 17 January each year, this creates difficulty for Sydney Water teams to collate and analyse the relevant data required for the annual report which also covers the fourth quarter. Due to limited staff and subject matter expert availability during the holiday period, Sydney Water also requests extending the submission deadline to 28 February 2026 to allow adequate time for data validation, internal review and reporting aligned with calendar year data. This approach was successfully trialled for the 2024 EMP Compliance Report.	Amend Table 4 - Mill Stream environmental management plan summary - 'Annual Compliance Report submitted by 28 February 2026'	Until end of Authorisation period – 31 March 2027
2(c)	Annual EMP Compliance Reports to the AEO by 31 January 2027, covering the period from 17 January 2026 to 17 January 2027	Annual EMP Compliance Reports to the AEO by 28 February 2027, covering the period from 01 January 2026 to 31 December 2026	As per 2(b).	Amend Table 4 - Mill Stream environmental management plan summary - 'Annual Compliance Report submitted by 28 February 2027'	
2(d)	Annual EMP Compliance Reports to the AEO by 31 March 2027, covering the period from 17 January 2027 to 17 March 2027	Annual EMP Compliance Reports to the AEO by 30 April 2027, covering the period from 01 January 2027 to 31 March 2027	The final report covering 01 January 2027– 31 March 2027 is proposed for submission by 30 April 2027 to allow sufficient time for data compilation and quality assurance and to align with the end of the current authorisation period.	Amend Table 4 - Mill Stream environmental management plan summary - 'Annual Compliance Report submitted by 30 April 2027'	
9	By 1 February 2025, 1 February 2026 and 1 February 2027 Sydney Water must provide an annual update on the progress of the implementation of the EMP at a community meeting to be held locally (e.g. Botany Town Hall).	By 1 February 2025, 1 March 2026 and 1 May 2027 Sydney Water must provide an annual update on the progress of the implementation of the EMP at a community meeting to be held locally (e.g. Botany Town Hall).	Community engagement meetings are proposed to shift to align with the proposed revised EMP Compliance Report schedule and ensure meaningful stakeholder communication. This approach was successfully trialled for the 2024 EMP Compliance Report.	NA.	

10	By 28 February 2025, 28 February 2026 and 28 February 2027 finalised copies of the Annual EMP Compliance Report must be provided to Bayside Council and published on the Sydney Water Website.	By 28 February 2025, 31 March 2026 and 31 May 2027 finalised copies of the Annual EMP Compliance Report must be provided to Bayside Council and published on the Sydney Water Website.	The publication deadline for EMP Compliance Reports is proposed to move to allow coordination with Bayside Council, and timely web publication.	NA.	
20	By 31 December 2024 Sydney Water must complete all operational works for the Botany Low Level Carrier Rehabilitation project.	By 31 December 2026 Sydney Water must complete all operational works for the Botany Low Level Carrier Rehabilitation project.	A number of complexities have been experienced in completing the operational works for the Botany Low Level Carrier Rehabilitation project, which have impacted delivery timeframes, and are anticipated to have an ongoing impact. These have now been estimated and incorporated into the delivery schedule. These complexities have included:: • Access constraints within Sydney Airport grounds requiring a formal access agreement; • Project delays stemming from prolonged negotiations and legal reviews of the Licence Access Agreement; • Technical challenges including debris obstruction, suspected pipe collapse, and heritage-listed tree root interference; • Environmental and asset condition; and • uncertainties impacting site investigations. Please refer to the attached for reference: • Stakeholder Reference Group Meeting Slides - 23 July 2025 (**Attachment A**), and • Project Control Group Meeting Slides - 15 August 2025 (**Attachment B**).	Amend the completion date for the Botany Low Level Carrier Rehabilitation project under section 6.1.5 and 'Table 4 Mill Stream environmental management plan summary', and update Appendix A 'Detailed delivery timeframes'.	
23	By 31 December 2026 Sydney Water must complete the construction and implementation of wastewater screening at Pump Station SP0038.	By 31 December 2026 Sydney Water must commence the construction and implementation of wastewater screening at Pump Station SP0038.	Sydney Water has redirected its focus toward an alternative solution to deliver	Amend the start of the wastewater screening construction and remove reference to completion date under section 6.4.2 and in 'Table 4 Mill Stream	

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			this project, which is progressing through the design phase. The preferred original design was scoped, however this option would have resulted in significant delays to project delivery due to heritage constraints and technical difficulties identified at Pump Station SP0038. Completion date of construction of the new design is estimated to be 31 December 2027 (to be determined in the next Authorisation period).	environmental management plan summary' and update Appendix A 'Detailed delivery timeframes'.	
24	By 31 March 2027, Sydney Water must complete at least 40% of the SWSOOS 2 desilting program	By 31 March 2027, Sydney Water must complete between 10-15% of the SWSOOS 2 desilting program.	Less than 1% of desilting has been completed as of September 2025. This is because the planned safe access approach to the SWSOOS 2 pipe to carry out the desilting required implementation of an isolation valve, and rectification of a collapsed section of overflow pipe. However, this access option risks resulting in minor leakage of dry weather sewage into the environment, which is a Non-Compliance under Sydney Water's Environment Protection License with the NSW Environment Protection Authority (EPA), and an offence under the Protection of the *Environment Operations Act 1997* (POEO Act). As a result, the project is currently on hold whilst Sydney Water ensures safe access and flow management constraints. An alternate strategy to assess other potential safe access solutions is also being undertaken in parallel.	Reflect new target for the desilting project under section 6.1.1, in 'Table 4 Mill Stream environmental management plan summary' and update Appendix A 'Detailed delivery timeframes'.	

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7.1.9 Appendix 9: Mill Stream Odour Monitoring Report-September 2025

7.1.10 Appendix 10: Mill Stream Water Quality Report 2025- Mill Stream WQ Report 2025.pdf , Mill Stream App 7.3 WQ raw data.xlsx

7.1.11 Appendix 11: An Overview of Model Compliance with Condition L7.1- Millstream Overflow Performance Reporting Jan 2025 to Dec 2025 Ver1.pdf