

2025 Environmental Risk Assessment - Naiiyu Wastewater Treatment Plant WDL 207-04

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Abbreviations and Glossary

Abbreviation	Definition
ANZECC	Australian Water Quality Guidelines for Fresh and Marine Waters
ARMCANZ	Agriculture and Resources Management Council of Australia and New Zealand
Assessment endpoints	The explicit expressions of the actual environmental value that is to be protected, operationally defined by an ecological entity and its attributes.
BOD	Biochemical oxygen demand
BUD	Beneficial Use Declaration – the uses of water specified in subsection 3 of the <i>Water Act</i> (1992)
BOM	Bureau of Meteorology
CSM	Conceptual site model
Cultural values	To provide water to meet aesthetic, recreational and cultural needs.
DLPE	Department of Lands, Planning and Environment (NT)
DO	Dissolved oxygen
<i>E. coli</i>	<i>Escherichia coli</i>
Ebb tide	A falling tide - the phase of the tide between high water and the succeeding low water.
Environmental Values	To provide water to maintain the health of aquatic ecosystems.
EPBC	Environment Protection and Biodiversity Conservation Act
ERA	Environmental risk assessment
ET	Equivalent Tenement – an average residential dwelling or house. Other developments are converted to an ET value by relating their average water demand (or sewage flow) to demand from one average house.
Flood tide	A rising tide - the phase of the tide between low water and the next high tide.
ICEGs	Indigenous Community Engineering Guidelines
kL	Kilolitre
Km	Kilometre
L	Litre
m	Metre
m ²	Square metre
Macrotidal estuary	Estuaries where the tidal range is in excess of 4 metres.
mg	Milligram
mL	Millilitre
NO _x	Nitrogen oxides – the sum of nitrate and nitrite ionic species.
NT	Northern Territory

NTU	Nephelometric turbidity units
NT EPA	Northern Territory Environmental Protection Authority
PL	Primary lagoon
Risk characterisation	The culmination of the planning, problem formulation and analysis of predicted or observed adverse ecological effects related to the assessment endpoints.
Risk hypothesis	Assumptions made in order to evaluate logical or empirical consequences, or suppositions tentatively accepted to provide a basis for evaluation. They are used to test if an activity (e.g. contaminant discharges) has adverse effects on an assessment endpoint.
SL	Secondary lagoon
SOCs	Site of conservation significance
SPS(s)	Sewage pump station(s)
SS / TSS	Suspended solids / total suspended solids
TDS	Total dissolved solids – the portion of solids in wastewater that passes through a 2.0 micron filter.
TN	Total nitrogen
TP	Total phosphorous
TPWC	Territory Parks and Wildlife Conservation Act
WDL	Waste discharge licence
WwTP	Wastewater treatment plant. All facilities that treat wastewater disposed of to the sewerage system consisting primarily of sewage as well as stormwater inflow and infiltration. These facilities may include a range of different types of treatment technologies e.g. waste stabilisation ponds.
WSP(s)	Waste stabilisation pond(s)

Executive Summary

This desktop environmental risk assessment (ERA) provides an assessment of the risks associated with the discharge of secondary treated effluent from the Nauiyu wastewater treatment plant (WwTP) to the Daly River via a seasonal freshwater creek.

Based on this ERA and water quality data, there is limited evidence to suggest deleterious impacts on the environmental values identified for this receiving environment.

Risks to the assessment end-points, associated with the source, were assessed as having medium to high risk rankings. These rankings were associated with the low discharge volumes into a freshwater environment, while higher risk rankings were associated with impacts to cultural values including human health risks through primary and secondary contact and aquatic food safety.

The risk rankings may change as uncertainties associated with current assessments are addressed. A range of recommendations have been made in this risk assessment to address knowledge gaps and identify opportunities for improvement.

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1.Introduction

Power and Water operate the Nauiyu WwTP pursuant to Waste Discharge Licence (WDL) 207-04 issued on 11 July 2023. This WDL allows for continuous discharge of secondary treated sewage effluent from an authorised discharge point to a seasonal freshwater creek that enters the Daly River.

Nauiyu (Daly River) is located approximately 230 km south of Darwin on the Daly River (Figure 1). Nauiyu has an estimated population of 411 (BushTel 2024). The Wastewater Treatment Plant (WwTP) is located approximately 1.1 km northeast of the Nauiyu township (Figure 2).

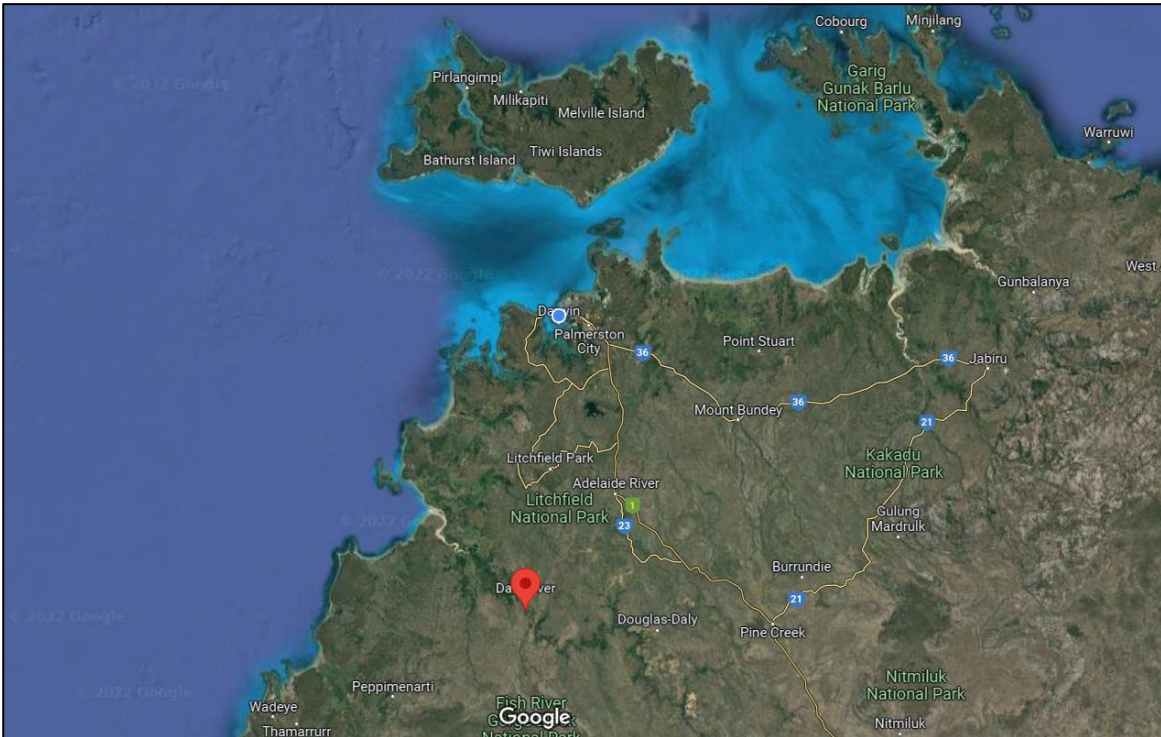


Figure 1: Nauiyu location (Google Earth, 2025)



Figure 2: Nauiyu site layout including WwTP and Outfall (NT ILIS 2016)

1.1 Background

Condition 43 (Item 15) of this WDL requires Power and Water to submit to the Northern Territory Environment Protection Authority (NT EPA) an updated ERA for the Licenced Activity by 1 February 2025.

The ERA must:

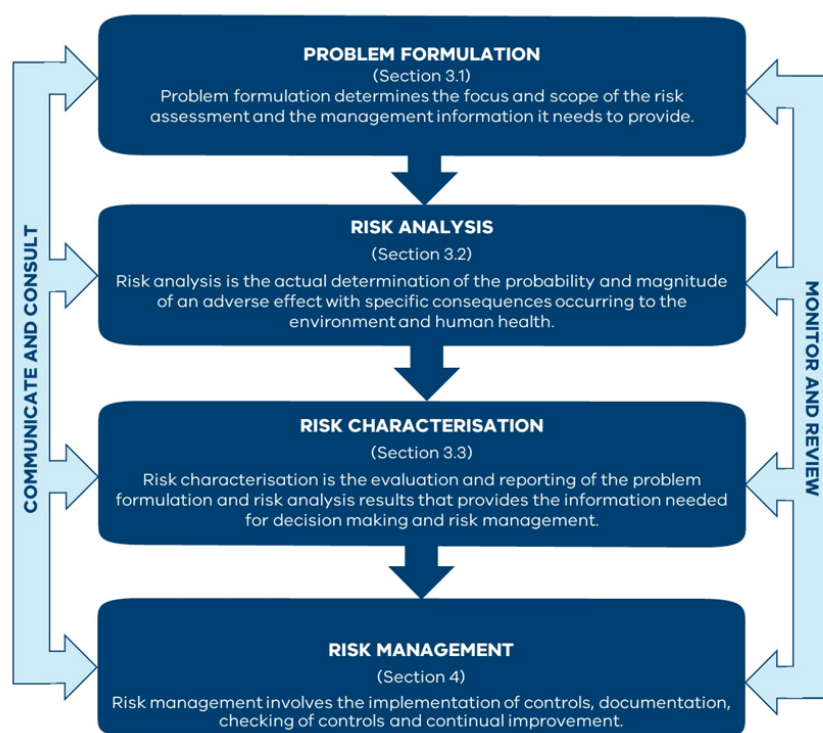
- i. be conducted with reference to a conceptual site model;
- ii. characterise the impacts of discharge(s) on the relevant environmental values; and
- iii. inform the development of a Performance Improvement Plan.

2. Risk Assessment Methodology

The purpose of the desktop ERA is to:

- identify assessment endpoints;
- characterise environmental risks associated with the facility; and
- initiate an ongoing iterative environmental risk process associated with ongoing operation of the facility.

The methodology employed has been adapted from ERAs completed by the Power and Water's Assurance Team and the Victorian EPA *Guidance for Environmental and Human Health Risk Assessment of Wastewater Discharges to Surface Waters* (VIC EPA 2023). The guidelines utilise a framework (Figure 3) consistent with current nationally and internationally accepted risk assessment approaches.



pond technology to achieve secondary level treatment of sewage effluent. To enhance the treatment process, the primary pond contains a mains-powered surface aerator (Figure 4). Based on current circumstances, the raw sewage is almost entirely domestic in nature with no chemicals added during the treatment process. The WwTP was constructed in May 1982 (Power and Water 2021). The ponds consist of a primary facultative pond which gravity feeds into a secondary maturation pond.



Figure 4: Naiiyu surface aerator in Pond 1 (Power and Water, 2022)

There is no gross pollutant screening, grit removal, maceration or storm flow separation located on the inlet to the pond system. The majority of the removal process for gross pollutants and other entrained materials is via sedimentation to sludge layers or entrapment in concentrated surface scums that can be physically removed. Desludging is conducted as required to maintain maximum pond performance and was most recently completed in the primary pond in 2011 and in the secondary pond in mid-2012 (Sweeney 2012).

WDL wastewater monitoring commenced in September 2015, consistent with WDL 207. Samples of the secondary pond outlet for the purpose of the WDL are currently conducted on a monthly basis. Monitoring results are included in the *PWC Annual Monitoring Report – Remote Community Waste Discharge Licences*, a summary is provided in Appendix 4.

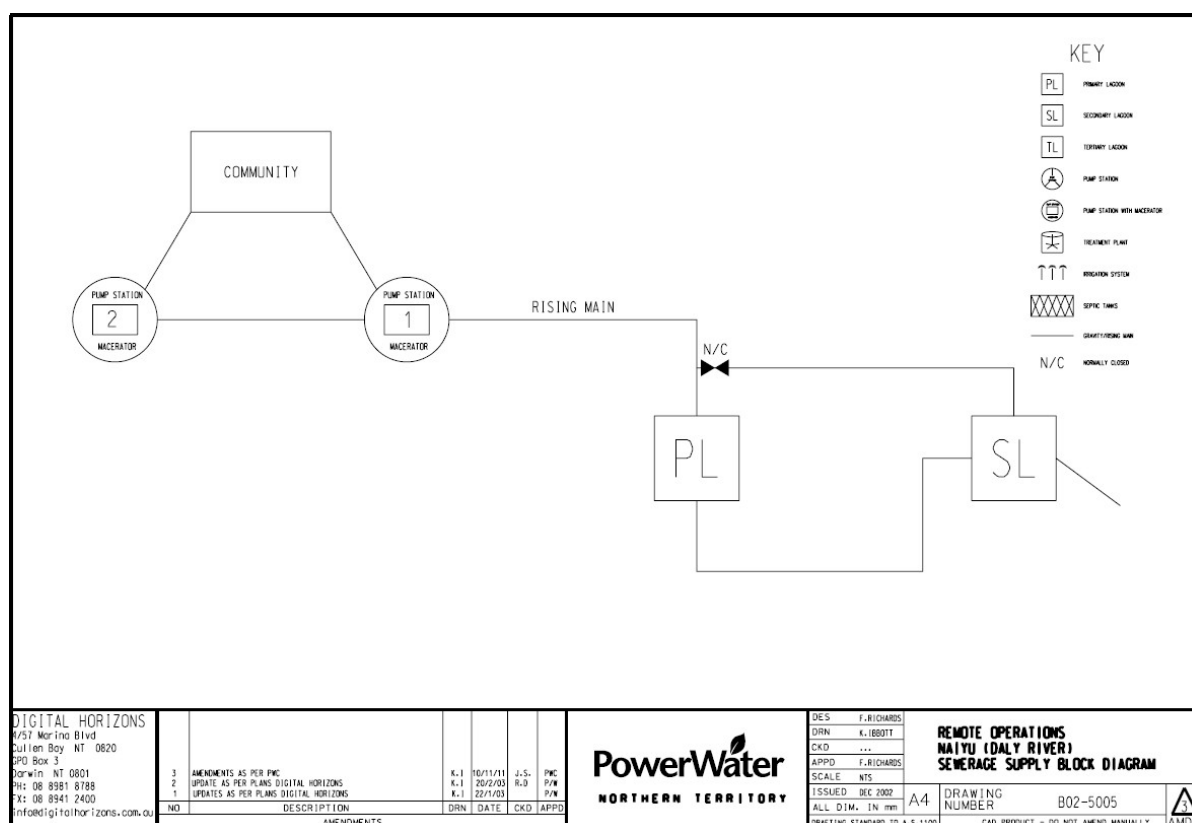


Figure 5: Naiyu wastewater collection and treatment configuration.

3.2 Discharge Regime

Discharge from the facility occurs from an outfall located in the secondary maturation pond. Discharge is continuous on an as-required basis (discharge is all year round) and occurs to ground. The area drains towards the Daly River via a seasonal freshwater creek. The discharge outfall is approximately 140 m in length.

Naiyu has a discharge flow metre installed, however currently the data set contains inconsistencies, reducing confidence in the data statistics. Further data collation and assessment is required over a longer-term to provide more accurate measurements for ERA. In the interim the annual water balance will continue to be utilised until the metered data is available.

- The estimated mean outflow from Naiyu WwTP is **113 kL/day**

Further data collation and assessment is required over a longer-term to provide more accurate measurements. Inflow data from flow meters is also not currently available, estimations have been utilised based on forecast sewage Equivalent Tenement (ET) flow, which may not accurately represent the inflow to outflow ratio on site.

3.3 Pond Performance

WSPs offer a low input, cost effective form of wastewater treatment that is particularly applicable in higher temperature environments with sufficient available land area. While the inputs are low, because it is largely driven by solar energy, the processes are no less complex and are largely controlled by the appropriate design and maintenance of the pond system to achieve the treatment performance required.

Wastewater monitoring at the Nauiyu primary pond inlet commenced in August 2020. This data will provide an accurate characterisation of the raw effluent entering the waste stabilisation pond system, and an indication of treatment performance.

Pond treatment performance can be measured at remote community sites utilising mean biochemical oxygen demand (BOD) removal performance and mean predicted *E.coli* disinfection performance. The results are a reduction in concentration levels from the primary pond inlet to the final pond outlet.

The mean removal percentage at Nauiyu WSPs has been calculated following the submission of the previous Environmental Risk Assessment and includes data from August 2022 to January 2025:

- Biochemical Oxygen Demand (BOD): **23%**
- Free Ammonia (NH₃-N): **12%**
- Total Nitrogen (TN): **15%**
- Total Phosphorus (TP): **1%**

The average log reduction for the pathogens indicator is:

- *E. coli*: **0.8 log reduction**

Note further monitoring data collection, statistical analysis and investigation is required to provide an accurate representation of pond performance.

The ponds ultimately provide a centralised treatment barrier that prevents direct contamination of the receiving environment and have an important role in the protection of both environmental and public health.

For the scope of this risk assessment, wastewater quality monitoring data collected at the final pond discharge point to the receiving environment are illustrated on the conceptual site model (CSM) (Appendix 1), and water quality table (Table 7); along with the estimated dilution ratio (Appendix 4).

3.4 Receiving Environment

During the Dry Season, discharge from the Nauiyu WwTP occurs to ground and forms a discharge influenced surface watercourse, which flows towards the Daly River through bushland from the ponds (Figure 6).



Figure 6: Nauiyu immediate receiving environment (Power and Water 2022)

Following site inspections in June 2022, it was confirmed that discharge does not reach the Daly River during the Dry Season; the treated effluent eventually infiltrates to ground within bushland. Figure 7 shows a dry creek bed 50 m from the Daly River entry point.



Figure 7: Dry creek bed near the Daly River entry point in June 2022 (Power and Water 2022).

During the Wet Season, it is unknown how often the discharge reaches the seasonal creek, and then continues to flow into the Daly River at the assumed entry point (Figure 8). If discharge reaches the entry point during wet weather, it is assumed the treated effluent would be highly

diluted. Further data collection of discharge flow volumes will assist with determining the likelihood of entry into the river and the associated environmental risks.



Figure 8: Daly River entry point (Power and Water 2022).

The Daly River is a perennial freshwater system river that is formed 60 km west of Katherine where the Katherine and Flora Rivers join. The Daly River then continues for 354 km westward before entering the Timor Sea at Anson Bay (DLRM 2004). During the Dry Season, flows are sustained by groundwater inflow from springs and other seepages from the Oolloo and Tindall aquifers. The Daly River has the highest end of Dry Season flow (approximately 12 m³/s) and the highest annual discharge (6730 GL) (Blanch, Rea and Scott 2005).

The discharge environment consists of Casuarina's (*Casuarina Cunninghamiana*), Cabbage Gum's (*Corymbia grandifolia*) and Melaleuca species, with a grass understorey mainly of perennial tall grasses (*Themeda australis*, *Sorghum plumosum*, *Sehima nervosum*;) (Blanch, Rea and Scott 2005). The immediate discharge point also contains the weed species Noogoora burr (*Xanthium strumarium*). Noogoora burr is in all regions of the Northern Territory and is commonly found along the Daly River (DLRM 2013).

As there is minimal development in this region and a sustained input of high-quality unpolluted water within the Daly River catchment, the receiving environment is considered pristine (Power and Water 2010). Overall, the ecological state of the Daly River and its tributaries can be described as healthy. The catchment was given a Framework of River and Wetland Health score of 0.85 in a 2009 assessment and a 0.94 River Disturbance Index) score in 2002 where a score of 1 is considered to be in 'natural' or reference condition (Schult and Townsend 2012).

Naiyu is located within the Daly River Middle Reaches site of conservation significance number three and contains five threatened species. The conservation status for these species listed under

the Territory Parks and Wildlife Conservation Act 2000 (TPWC) and the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC) are summarised below in Table 1.

The Daly River supports the greatest number of species of freshwater turtles in Australian rivers (8 of the 12 species found in the NT) including the largest population of pig-nosed turtle in Australia, which is classified as 'near threatened' in the Northern Territory. The species is an important food source and is of significant cultural value to Indigenous people. The river is also widely held by anglers to be the best barramundi-fishing river in Australia. It is known to contain 48 species of freshwater and estuarine fish. The presence of the threatened freshwater sawfish and freshwater whipray also contribute to its national significance (Blanch, Rea and Scott 2005).

Table 1: Conservation status of species at risk from the Nuiyu WwTP.

Common name	Species name	National Status (EPBC)	NT Status (TPWC)
Vertebrates			
Gouldian Finch	<i>Erythrura gouldiae</i>	EN	VU
Masked Owl	<i>Tyto novaehollandiae</i>	VU	VU
Northern Quoll	<i>Dasyurus hallucatus</i>	EN	CR
Merten's Water Monitor	<i>Varanus mertensi</i>	EN	VU
Large-tooth sawfish	<i>Pristis microdon</i>	VU	VU

CR – Critically Endangered, EN – Endangered, VU – Vulnerable

3.5 Screening Level Risk Assessment

A screening level risk assessment is used to determine if a risk to the assessment end-point exists that should be further investigated. It is a method for prioritising risks and minimising effort in assessing low risks. Table 3 provides a summary of the screening level risk assessment.

Risk hypotheses for the stressors identified in the conceptual site model (CSM) (Appendix 1, Figure 9) are defined with respect to their potential effects on the identified values of the receiving environment.

The identified values of the receiving environment are summarised below in Table 2.

Table 2: Identified values of receiving environment at risk from the Yirrkala WwTP

Values	Receptors	
Cultural/ Human Health	Humans	Fishing Boating Hunting Tourism Visible water quality Sacred sites
Environment	Marine	Fish Freshwater turtles Whip Ray Sawfish Macroinvertebrates
	Terrestrial	Waterbirds Invertebrates Mammals Reptiles
	Plants	Vine thickets Native vegetation Aquatic plants

Table 3. Screening level risk assessment for key indicator and stressors associated with Yirrkala WwTP discharge.

Indicator (water quality parameter)	Stressor (change to indicator)	Risk Hypothesis		Assessment end-points		Scope of this desktop ERA	Further investigation required?
		ENVIRONMENTAL	CULTURAL	ENVIRONMENTAL	CULTURAL		
Gross pollutants	Presence and accumulation of gross pollutants from influent carried through to effluent	That gross and micro-scale pollutants are ingested by biota resulting in death of animals and environmental degradation.	That gross pollutants are resulting in the reduction of visual amenity in the receiving environment.	To maintain the presence of biota in the environment.	To maintain the visual amenity of the environment.	The WwTP is considered a relatively effective barrier to gross pollutant entry to the receiving environment. This is due to the settling out to sludge layers and accumulation on pond surface where gross pollutants are physically removed as required. No evidence of gross pollutant accumulation during visual monitoring of discharge site (qualitative discharge criteria). No further investigation necessary at this stage.	No
Organic matter	Increase in BOD, decrease in DO	That BOD is leading to oxygen depletion in the environment resulting in loss of biota (e.g. fish kills) and changes to ecosystem structure.	That BOD is leading to odours resulting in the reduction of amenity in the receiving environment.	To maintain the presence of biota in the environment.	To maintain oxygen levels in the environment sufficient to prevent production of odours.	The median concentration of BOD in the discharge of Naiiyu WwTP is 25.5 mg/L. As BOD is present in the discharge, it is determined at a screening level that a risk is present and further investigation is necessary.	Yes
Nutrients (nitrogen and phosphorus)	Increase in nutrient concentrations	That nutrients are leading to nuisance plant growth (e.g. phytoplankton blooms) resulting in oxygen depletion; displacement of endemic species; diminished light availability; release of toxins; and changes to ecosystem structure.	That nutrients are resulting in the reduction of amenity of receiving environment through reduction in water clarity, objectionable discoloration and odours; toxic blooms that are a public health risk; and blooms of toxin producing species whereby the toxins bio-accumulate in shellfish and fish ingested by humans.	To maintain nutrient levels so that the levels of primary production do not have an adverse impact on ecosystem structure.	To maintain the amenity of the environment.	As nutrients are present in the discharge, it is determined at a screening level that a risk is present and further investigation is necessary.	Yes
Toxicants	Increase in free ammonia concentration	That free ammonia is resulting in toxicity to aquatic organisms in water and sediments.		To maintain the presence of biota in the environment.		The median concentration of free ammonia in the discharge of Naiiyu WwTP is 21 mg/L. At a screening level it is determined that a risk is present and further investigation is necessary.	Yes
Pathogens	Presence of <i>E. coli</i>		That pathogens are leading to the contamination of water resulting in primary and secondary contact recreation a public health risk; and accumulation in shellfish resulting in the consumption of shellfish a public health risk.		To maintain that pathogens from municipal wastewater are not increasing the risk of illness via primary and secondary contact recreation and consumption of shellfish.	The median pathogen concentration in the discharge of Naiiyu WwTP is 173,290 MPN /100mL. At a screening level it is determined that a risk is present and further investigation is necessary.	Yes

4. Risk Analysis and characterisation

4.1 Power and Water Risk Management Framework

Power and Water has adopted a qualitative risk assessment methodology aligned to the Australia/New Zealand Standard “AS/NZ 4360: Risk Management”. This process is used to assess and manage activities that have potential to cause environmental harm.

The first step in the ERA process is to identify the aspects (problem formulation i.e. discharge of treated wastewater) (section 2.0) and corresponding potential impacts associated with each assessment endpoint identified in the screening level risk assessment as seen in Table 3.

This methodology is based on knowledge of the existing environment and incorporates site specific environmental factors into the analysis of the potential impacts. An assessment of each impact is analysed for likelihood and consequence.

The categories and associated rankings for environmental impact consequences are shown in Appendix 3 (Table 5). The likelihood of an event occurring and a risk score for each potential impact is determined by combining likelihood with consequence results as seen in Appendix 3 (Figure 10).

Low to medium risks can typically be managed by routine procedures and integration into management plans, while high to extreme risks require senior management attention, immediate action or more detailed research and management planning.

3.1.1 Risk assessment for key indicators and stressors identified in screening level assessment.

Table 4: Risk assessment for key environmental and cultural assessment endpoints associated with Nauiyu WwTP discharge.

Hypothesis	Consequence	Likelihood		Inherent Risk Ranking	
Environmental					
BOD is leading to oxygen depletion in the environment resulting in loss of biota and changes to ecosystem structure .	Based on the 2023-2024 monitoring data, the median Nauiyu WwTP BOD discharge quality is 25.5 mg/L. The estimated dilution volume ratio between prior to the treated wastewater reaching the Daly River receiving environment is 1:108.7, suggesting any observed oxygen demand would be absorbed by the environment.	Moderate	Stressor not typically observed with such small discharge and dilution experienced in receiving waters. Based on the sampling results to date, Power and Water considers that the likelihood of oxygen depletion in the receiving environment is unlikely. Oxygen levels would increase as treated effluent flows along the discharge influenced water course and seasonal creek towards the Daly River. Ongoing sampling will assist to characterise discharge quality.	Unlikely	Medium
Free ammonia is resulting in toxicity to aquatic organisms in water and sediments.	Based on the 2023-2024 monitoring data, the median Nauiyu WwTP free ammonia discharge quality is 21 mg/L. One of the most visible means by which toxicity presents in an aquatic ecosystem is through the occurrence of fish kills. No fish kills reported to date.	Moderate	Stressor not typically observed with such small discharge volumes and dilution experienced in receiving waters. Based on the sampling results to date, Power and Water considers that the likelihood of toxicity to aquatic organisms in water and sediments is unlikely. During the Dry Season aquatic species would not be impacted. During the Wet Season it is unlikely species within the Daly River would be impacted due to the significant flow of the river and inputs from other sources. Ongoing sampling will assist to characterise discharge quality.	Unlikely	Medium
Nutrients are leading to nuisance plant growth resulting in oxygen depletion; displacement of endemic species; diminished light availability; release of toxins; and changes to ecosystem structure.	Based on the 2023-2024 monitoring data, Nauiyu WwTP contributes 1.5 and 0.2 tonnes/year of total nitrogen and phosphorus respectively. These inputs are dwarfed by the Daly River catchment inputs of 3350 and 410 tonnes/year for total nitrogen and phosphorus respectively (Rustomji and Caitcheon 2010). The discharge area is also densely vegetated suggesting reduction of nutrients through transpiration and uptake of nutrients from the discharge.	Moderate	Based on the sampling results to date, Power and Water considers that the likelihood of nuisance plant growth in the receiving environment is unlikely. During the Dry Season, discharge volumes are low, influenced water course is very shallow, during the Wet Season, significant dilution and flow would occur within the seasonal creek and the Daly River, preventing nuisance plant growth. Ongoing sampling will assist to characterise discharge quality.	Unlikely	Medium
Cultural/ Human Health					
BOD is leading to odours resulting in the reduction of amenity in the receiving environment.	The river is identified as having cultural beneficial uses for primary and secondary recreation.	Moderate	Stressor not typically observed with such small discharge volumes and dilution experienced in receiving waters. No evidence of odours during monitoring of discharge location at final pond (qualitative discharge criteria). Power and Water considers that the likelihood of reduction in amenity from BOD is unlikely.	Unlikely	Medium
Nutrients are resulting in toxic blooms that are a public health risk; and blooms of toxin producing species whereby the toxins bio-accumulate in shellfish and fish ingested by humans.	The river is identified as having cultural beneficial uses for primary and secondary recreation including exposure through exploratory wading, fishing and collecting food, fibres and medicines (DSEWPC 2010).	Major	E.coli concentrations are elevated in comparison to other remote WwTPs. Some risk may be observed at the immediate discharge point. It is unlikely that toxic blooms would appear within the Daly River due to the treated effluent in the Wet Season due to the distance to the entry point and rainfall dilution. Based on the primary and secondary contact recreation and cultural uses of the coastline, Power and Water considers that the likelihood of toxicant exposure is unlikely.	Unlikely	High
Nutrients are resulting in the reduction of amenity of receiving environment through reduction in water clarity , objectionable discolouration and odours .	The river is identified as having cultural beneficial uses for primary and secondary recreation.	Moderate	No evidence of reduction in water clarity, objectionable discolouration of receiving water or odours during monitoring of discharge site (qualitative discharge criteria). The discharge from Nauiyu WwTP to ground – no reduction in water quality within the immediate discharge point. Power and Water considers that the likelihood of reduction in amenity from nutrients within the seasonal creek and Daly River would be unlikely.	Unlikely	Medium
Pathogens are leading to the contamination of water resulting in a public health risk through primary and secondary contact recreation.	The river is identified as having cultural beneficial uses for primary and secondary recreation including exposure through exploratory wading, fishing and collecting food, fibres and medicines (DSEWPC 2010).	Moderate	Based on the distance to the Daly River, Power and Water considers that the likelihood of the illness from pathogen exposure at the entry point is unlikely. Further investigation during the Wet Season is required to assess risks associated with public health risk and primary and secondary recreation activities within the immediate entry point.	Possible	Medium
Pathogens are leading to accumulation in shellfish resulting in a public health risk through the consumption of shellfish.	Consumption of fish is known to occur within the area.	Major	Based on the cultural uses of the coastline, Power and Water considers that the likelihood of the illness from pathogen exposure through the consumption of shellfish is unlikely, due to the distance to the river from the discharge point. Further investigation is required.	Unlikely	High

5. Summary

The ERA found that the identified values of the Daly River at risk from the Nauiyu WwTP discharge were environmental and cultural.

The key stressors that posed a risk to these values were the presence and accumulation of gross pollutants from influent carried through to effluent; increase in BOD; increase in nutrient concentrations; increase in free ammonia concentration and the presence of *E. coli*.

The ERA process has determined that the discharge from the Nauiyu WwTP poses a medium to high risk to the identified values of the receiving waterway. The influence of the discharge on the receiving environment is considered sustainable given the low discharge volumes and removal of nutrients and pathogens through dense vegetation at the outfall. Based on this ERA and water quality data, there is limited evidence to suggest deleterious impacts to the receiving environment.

All risk rankings have considerable uncertainties attached to the assessments. The risk rankings may change as uncertainties associated with current assessments are addressed.

Based on the ERA process and outcomes, Power and Water make the following recommendations:

- continue monitoring quality of wastewater discharged to the environment;
- incorporate recommendations into future Performance Improvements Plans;
- implement options to accurately quantify the volume of treated wastewater discharged to the environment; and
- update the ERA and CSM based on new information and additional wastewater quality data.

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Appendices

Number	Title
Appendix 1	Naiyu Conceptual Site Model
Appendix 2	Daly River Middle Reaches Site of Conservation Significance
Appendix 3	Power and Water Risk Matrix
Appendix 4	Water quality and estimated dilution Ratio for Naiyu WwTP

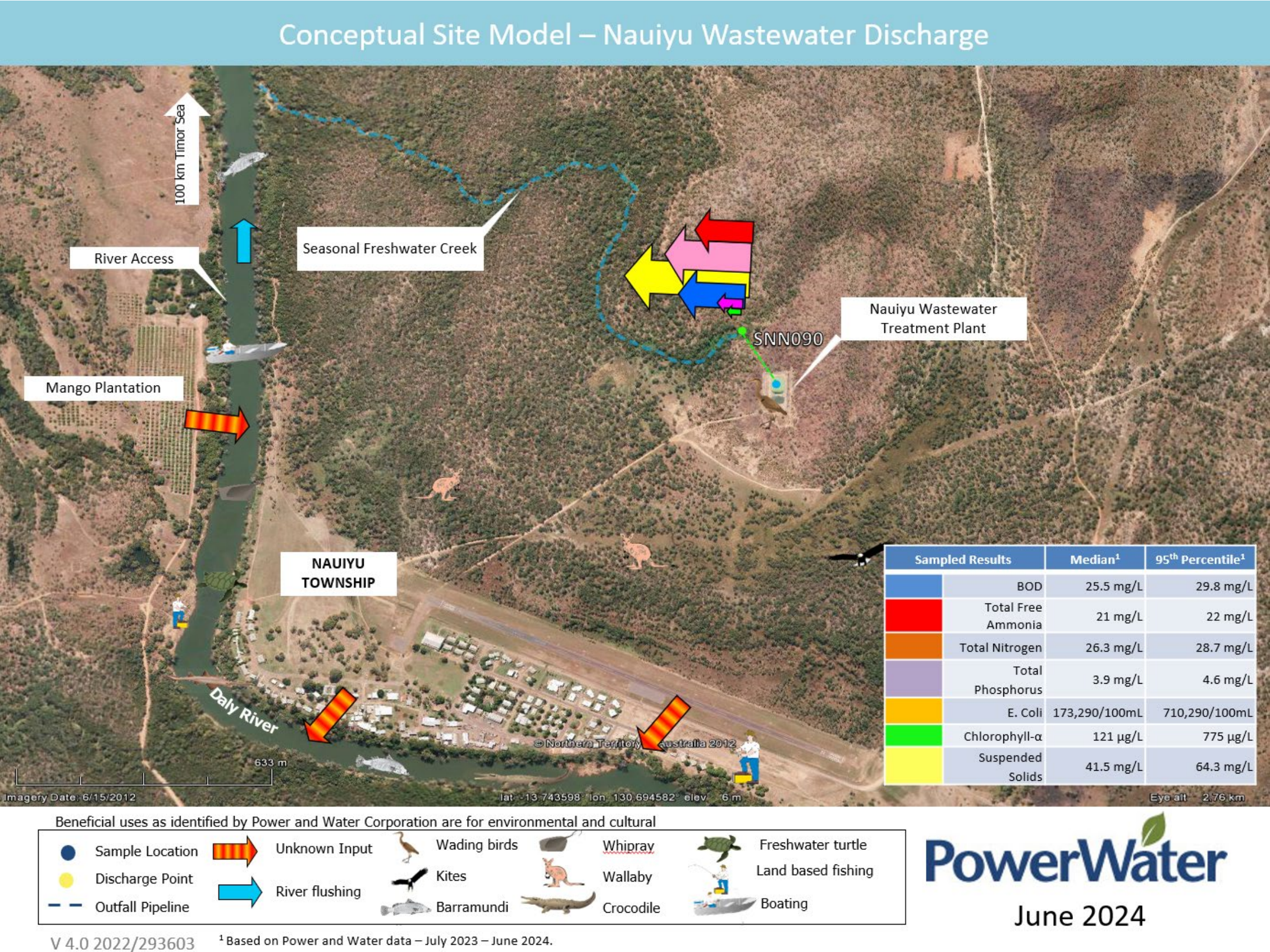


Figure 7: Conceptual site model for the Naiyu WwTP.

Appendix 2 – Daly River Middle Reaches Site of Conservation Significance

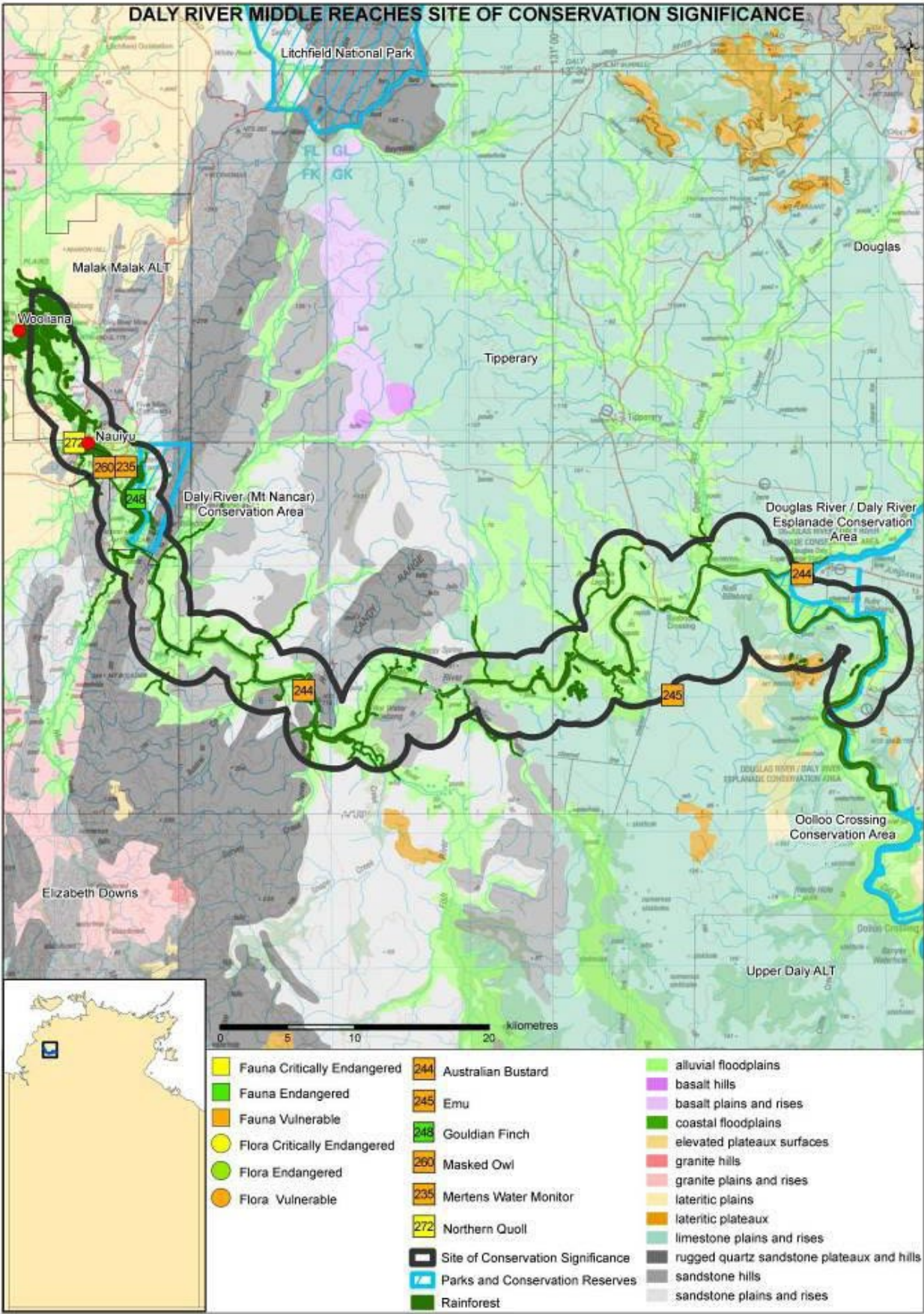


Figure 8: Daly River middle reaches site of significance map (NRETAS, 2008).

Appendix 3 – Power and Water Risk Matrix

Table 5: Power and Water risk consequence table.

CONSEQUENCES

The consequence (impact or outcome) associated with a risk is assessed using the following criteria:

RISK CONSEQUENCE TABLE					
Category	Insignificant	Minor	Moderate	Major	Severe
Health and safety	Physical: A near miss incident without injury or illness. Psychosocial*: No treatment needed from a health professional. *Notes: Psychosocial harm relates to the factors in the design or management of work that increases the risk of work-related stress and can lead to psychological or physical harm.	Physical: An incident resulting in a minor injury or illness, and first-aid treatment applied. Psychosocial: Reduced ability to perform tasks, no professional treatment needed.	Physical: An incident resulting in an injury or illness requiring medical treatment*. Psychosocial: Reduced ability to perform tasks, likely needs ongoing support from a health professional. *Notes: Medical treatment relates to treatment by a medical professional at a medical facility. Treatment at a worksite by a paramedic is a first aid injury, unless they are transported to a medical facility.	Physical: A serious incident: - Requiring hospitalisation (24hrs); and/or - Resulting in long-term permanent disabling; or - Exceeding of chemical exposure with acute health impacts. Psychosocial: Serious psychological treatment needed, reduced ability to perform tasks.	Physical: A serious incident resulting in any one or more of the following: - One or more fatalities; - One or more persons seriously injured (includes long-term disabling effect); - Widespread hospitalisation of members of the public or Power and Water's workforce. Psychosocial: Inability to perform tasks, ongoing extensive psychological treatment.
Financial (Impact on EBITDA)	Loss less than \$500K.	Impact between \$500K and \$5M.	Impact between \$5m and \$25m.	Impact between \$25m and \$50m.	Impact greater than \$50m.
Legal/ regulation	- Individual breach of obligation, procedure or policy. - Civil action, fines and/or civil penalties (refer to Financial definition)	- Notification to regulator required. - Regulator/external auditor non-conformance or request for further explanation - Functional breach of obligation, procedure or policy. - Civil action, fines and/or civil penalties (refer to Financial definition)	- Regulator/ external auditor issues improvement notice, multiple non-conformances or provisional improvement notice. - Systemic breach of obligation, procedure or policy. - Civil action, fines and/or civil penalties (refer to Financial definition)	- Regulator issues notices, corrective action order and/or penalties - Order to stop work - Multiple provisional improvement notices, prohibition notice. - Civil action, fines and/or civil penalties (refer to Financial definition)	- Successful criminal prosecution imprisonment of Power and Water director and/or officer. - Royal Commission, parliamentary or other government inquiry, - Loss of licence to operate. - Civil action, fines and/or civil penalties (refer to Financial definition)
Environmental	Localised low level damage controlled but no remedial action required.	Localised low level damage controlled and remedied with minimal resources.	Widespread temporary damage with extended resources to remedy.	Long-term detrimental effect on environment and once controlled results in minor permanent damage.	Substantial permanent damage to widespread and sensitive areas.
Reputation	- No media attention; and/or - Isolated community or individual issue-based concern; and/or - Localised employees dissatisfaction which is managed by normal business processes;	- Occasional once-off negative media attention; and/or - Localised community impacts and customer concerns; and/or - Localised employees dissatisfaction which requires human resources in resolution;	- Brief adverse media attention and/or - Community/customer condemnation; and/or - Limited, localised loss of confidence by the community; and/or - Reduced confidence of key stakeholders - Localised employees dissatisfaction with localised impacts to service delivery	- Prolonged adverse media attention and/or - Community/ customer condemnation; and/or - Prolonged, widespread community/ customer loss of confidence; and/or - Confidence of key stakeholders damaged - Widespread dissatisfaction and loss of confidence by employees resulting in temporary service delivery	- Sustained adverse media attention and/or - Community/customer condemnation; and/or - Sustained community/ customer loss of confidence; and/or - Loss of stakeholder confidence in Board and/or - Management; and/or - Widespread dissatisfaction by employees resulting in sustained service delivery and industrial action
Customer (Impact due to disruption to services)	- No loss of supply. Issues rectified with corrective action. - Loss of water supply <= 2 hours in any urban or remote community	- An event resulting in loss of a single residential feeder for 15 to 30 minutes - Loss of water supply >2 hrs and <= 6 hours in any remote community - Loss of water supply in urban area, restored within expected timeframes (<=4 hours)	- An event resulting in loss of a single to multiple zone substations for up to 3 hours - Loss of water supply >6 and <=12 hours in any remote community - Loss of water supply in urban area outside of expected timeframes (> 4 hours and <=12 hours).	- An event resulting in loss of a single to multiple zone substations affecting CBD, town centres, commercial, and emergency services lasting up to 6 hours - Loss of water supply >12 hours < =24 hours in any urban area or remote community.	- An event resulting in loss of a single to multiple zone substations affecting CBD, town centres, commercial, and emergency services lasting > 6 hours - Complete loss of water supply (>24 hours) in any urban or remote community.

LIKELIHOOD

The likelihood of a risk occurring is assessed using the following scale:

(E) Almost certain	Event is expected to occur on a regular basis. One or more times per annum.	Not applicable
(D) Likely	An event is expected to occur from time to time. Once every 1 – 3 years	Probability of occurring is greater than 33%
(C) Possible	An event should occur at some time. Once every 4 – 10 years.	Probability of occurring is greater than 10% and up to and including 33%
(B) Unlikely	An event could occur at some time. Once every 11 to 30 years	Probability of occurring is greater than 3% and up to and including 10%
(A) Rare	An event not expected but possible. Less than once in 30 years	Probability of occurring is up to and including 3%

RISK RATING

Consequences and Likelihood

		Consequence				
		Insignificant (1)	Minor (2)	Moderate (3)	Major (4)	Severe (5)
Likelihood	Almost certain (E)	Medium	High	Very High	Extreme	Extreme
	Likely (D)	Low	Medium	High	Very High	Extreme
	Possible (C)	Low	Low	Medium	High	Very High
	Unlikely (B)	Low	Low	Medium	High	High
	Rare (A)	Low	Low	Low	Medium	Medium

ACTIONS AND REPORTING

	Low	Medium	High	Very High	Extreme
Escalation (new risk or reassessment)	Reported through risk review process.	Reported through risk review process.	Reported to executive general manager	Reported to CEO / Executive Leadership Team as soon as practicable.	Reported to Board Chair as soon as practicable.
Reporting to ARMC	Not applicable.	Not applicable.	To be reported to Audit and Risk Management Committee on a quarterly basis.	To be reported to Audit and Risk Management Committee on a quarterly basis.	Exception reporting as soon as practicable.
Tolerance	Tolerable unless otherwise determined by management.	Tolerable unless otherwise determined by management.	Tolerance to be determined by executive general manager.	Tolerance to be determined by CEO / Executive Leadership Team.	Tolerance to be determined by Board.
Risk monitoring	Reporting frequency to be annual.	Reporting frequency as per related business process.	Status to be reported to executive general manager at each business unit management meeting. Reporting frequency to be quarterly.	Status to be reported to each ELT. Reporting frequency to be quarterly	Status reported to each Board meeting. Reporting frequency to be quarterly

Note: "Escalation" refers to the escalation of **risks** (i.e. events that could happen in future) not **incidents** (events that have happened). Escalation of incidents is covered by the *HSE Incident and Investigation Management Procedure (CONTROL0070)*.

Figure 9: Power and Water likelihood, risk ranking, actions and reporting matrix.

Appendix 4 – Water quality and estimated dilution Ratio for Naiiyu WwTP

Naiiyu WwTP discharges to a seasonal creek. Under conditions of low or no rainfall the outflow is contained in the locality of the outfall and absorbed largely through evapotranspiration, while under conditions of modest rainfall the outflow is transported and retained further along the seasonal creek. It is expected that limited dilution of the treated wastewater occurs under these conditions. During the wet season, under conditions of higher rainfall the diluted outflow reaches Daly River and the wider environment.

Under the scenario where treated wastewater reaches the Daly River environment, significant dilution and augmentation of the flow by rainfall would occur. An approximate catchment for this rainfall is shown in Figure 9. A conservative dilution factor is calculated below based on the volume of rainfall falling on this catchment during the wet season. Further significant dilution of the treated wastewater would occur within Daly River.

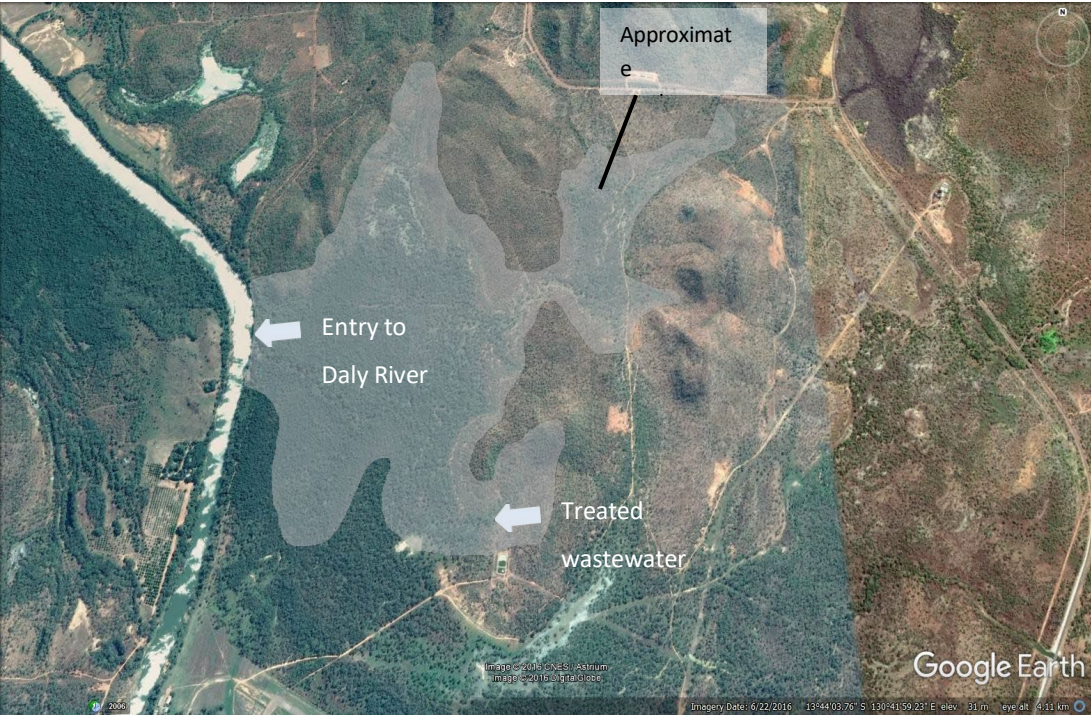


Figure 10: Approximate catchment surrounding unnamed surface watercourse downstream of Naiiyu WwTP outfall (Google Earth 2017).

Table 6: Discharge volume and dilution ratio estimate

Approx. catchment upstream of Daly River (m²)	Mean rainfall (Dec-Mar) (mm/d)	Mean evaporation (Dec-Mar) (mm/d)	Mean treated wastewater outflow (kL/d)
2,670,000	9.7	5.1	113
Volume of rain fall capture downstream of wetland (rainfall-evap) (kL/d)	12,282		
Dilution ratio prior to entering Daly River	1:108.7		

Table 7: Summary of 2023-2024 Naiiyu water quality results

Sample Location/Asset: SYI090 (Pond 2 Outlet)	
Indicator	Median
Physio-chemical Parameters	
pH (pH units)	7.5
Electrical Conductivity (uS/cm)	720
Dissolved Oxygen (% Saturation)	10
Turbidity (NTU)	3.85
Total Suspended Solids (mg/L)	41.5
Biological Parameters	
Biochemical Oxygen Demand (mg/L)	10
Chlorophyll-a (ug/L)	120.5
Nutrient Parameters	
Ammonia (Total as N – NH3-N) (mg/L)	21
Total Nitrogen (mg/L)	26.3
Oxidised Nitrogen (NOx) (mg/L)	0.1
Total Phosphorus (mg/L)	3.85
Pathogen Indicators	
Escherichia coli (MPN/100mL)	173,290
Enterococci (MPN/100mL)	7,250

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