

26th November 2019

Peter Achterstraat AM
NSW Productivity Commissioner
<http://productivity.nsw.gov.au/>

Dear Mr Achterstraat,

SUBMISSION TO THE NSW PRODUCTIVITY COMMISSION'S REPORT, OCTOBER 2019

This submission is made on behalf of **OneWater Advocates**, an independent body of experienced water leaders and practitioners, concerned that Australia is falling behind in realising the sustainable use of its water resources. The group's aim, by speaking out, is to 'encourage a positive and unified national consensus for innovative management of water', one that is based on a thorough and transparent consideration of *all* supply options.

1. Our submission relates to **Section 5** of the Report, namely "Reliable, sustainable and productive use of our water and energy", with a focus on the 'water' component and in particular on **Section 5.5, 'Expanding the role of water recycling and greater efficiency'**.

However, we first need to stress that, in our opinion, the management of water in NSW, and in Australia as a whole, has been hampered by the lack of long-range planning. This plan should be viewed as a 'living document' that is reviewed each year and which presents a clear picture of what steps need to be taken to ensure security of water supply is maximised in our Regional and Urban areas. It should also be available for free and easy access by community members as well as all those involved in water. Granted that while this plan must have a national focus, NSW should clearly be part of it.

2. **Section 5.5, page 60** states that in 'water recycling need not involve direct recycling of wastewater for potable reuse'. However, the Report does acknowledge that there is a potential longer-term transition to this form of water recycling.

We respectfully submit that ALL forms of water recycling should be considered now as the conversation needed to achieve this could well take 3-5 years (Perth took some 10 years to achieve its potable reuse scheme). We believe that there will be a need for potable reuse in some shape or form in the coming future and that there should be no barriers to openly

considering it now – as is evidenced by recent comments made by the NSW Water Minister, using the phrase, “All Options must be on the Table”.

3. **Section 5.5, page 61** raises the question ‘*What are the barriers to New South Wales achieving larger-scale and cost-effective recycling ?*’.

It is our view that the purpose of the Section 60 approval is poorly understood by the industry as there is no clear identification as the nature of the risk that the Government is attempting to mitigate against. It is our opinion that this uncertainty has been a roadblock for many Councils and at times the advice or feedback given has been contrary to ‘best’ (or even ‘good’) industry practice. This latter situation arises from the staff/section currently assessing proposals for Section 60 approvals not having the knowledge, skills or resources to properly undertake these approvals.

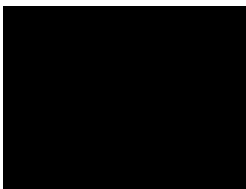
We submit that this is one significant barrier to increasing the uptake of water recycling in NSW and urge to Commission to take our view into consideration.

4. A paper prepared and presented at the NSW AWA 2019 Regional Conference by the Balmoral Group of Australia addressed “The Economics of Sustainable Water Supply Solutions for Regional NSW – is it time to consider Potable Reuse as part of the answer ?”. Building on the work behind this paper and the Commission’s Report, we consider that:

- Potable Reuse options must be considered in all Integrated Water Cycle Management Plans (IWCMPs);
- Clear instructions should be issued to the DPIE (Water) that all forms of water recycling must be considered in all IWCMPs;
- Water reuse schemes should be built where it is the most efficient use of money before it becomes an emergency and be part of the longterm water supply. This will defer the drawdown on current surface and stored water supplies allowing water utilities to delay the onset of water restrictions. This would enable water utilities to manage droughts more effectively.

We trust the Commission will find this submission from **OneWater Advocates** of value in its deliberations and please do not hesitate to contact the undersigned should any clarification of our views and opinions be required.

Yours sincerely



IBL Solutions & Co-convenor of **OneWater Advocates**

