

**Date 5/08/2021**

Laura Downes

Manager | Water Sector Climate Change Mitigation and Adaptation | Sector Resilience

Dear Laura

The Water Services Association of Australia (WSAA) is pleased to provide a submission on the Draft Water Cycle Adaption Action Plan 2022-26.

The Water Services Association of Australia (WSAA) is the peak industry body representing the urban water industry. Our members provide water and sewerage services to over 24 million customers in Australia and New Zealand and many of Australia's largest industrial and commercial enterprises. Based around our vision of 'customer driven, enriching life' WSAA facilitates collaboration, knowledge sharing, networking and cooperation within the urban water industry.

We are proud of the collegiate attitude of our members which has led to industry-wide approaches to national water issues. We feel that the water industry is uniquely positioned to mitigate our impact on climate, respond and adapt to the impacts of a changing climate on the delivery of our services, and improve the resilience of our communities and the environment in adapting to a changing climate.

Our hope is that the urban water industry will achieve net zero greenhouse gas emissions by 2050; or sooner where it aligns with customer expectations. We are excited to see that the Victorian Government has made a similar commitment within Water for Victoria.

We are also pleased to see the commitment to equity and community engagement within the Water Cycle AAP and welcome the commitment to partnering with Traditional Owner groups in water management and reconnecting Aboriginal communities.

WSAA are very concerned that, due to climate change, Australian and New Zealand water supplies are facing increasingly variable rainfall and inflows into rivers and dams, where our reliance on rainfall dependent water supply options is a risk to the water security of our cities and communities.

Climate change will mean drinking water quality management will become more challenging. Extreme events like floods and bushfires cause stress to our waterways, their natural capacity to assimilate large scale nutrient inputs is reduced and water quality declines. A changing climate also means our cities are getting hotter and less attractive places to be and this is placing greater stress on the physical and mental health of our communities. Adapting to climate change means that we must take up more opportunities to design new growth areas with desirable, liveable features such as blue and green infrastructure, adding to property and tourism values and helping to support the fundamental needs of our communities.

Since the Millennium Drought, many in the urban water industry have worked to secure climate resilient sources of water through both supply side (e.g., desalination, recycled water) and demand side (e.g. leakage reduction, water efficiency) initiatives. The industry will continue to diversify our water sources using an integrated water management approach with all options on the table.

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Our key feedback on the Draft Water Cycle Adaption Action Plan 2022-26 is that good water industry planning means having all options on the table. While diversification itself is critical, good water industry planning means having all options on the table for consideration, including purified recycled water for drinking alongside desalination, water efficiency, dams and recycling for non-drinking purposes. By example, we commend Infrastructure Victoria on their recently released [Draft 30 Year Infrastructure Strategy](#), which proposes lifting Victoria's policy ban on using recycled water for drinking.

We echo the Productivity Commission Report [Integrated Urban Water Management — Why a good idea seems hard to implement](#) from 2020 that cautions that policy bans have the potential to result in the adoption of higher cost or otherwise inferior solutions and inhibit the sector from delivering the full range of potential water sector outcomes in a cost-effective way.

Making all options available will provide communities with increased flexibility to deliver place-based solutions at a catchment scale. Place-based solutions provide opportunities for better integration with land use and infrastructure planning. Place-based solutions also provide opportunities to better respond to community preferences and help integrate Traditional Owner custodianship.

We note that the Draft Action Plan acknowledges that WSAA can provide a forum that can be used to help reduce barriers to adaptation. We also acknowledge that the Plan references WSAA's Climate Change Adaptation Guidelines as an industry-driven guideline providing a framework for increased resilience across Australia's water utilities.

We also recommend that the Draft Action Plan references our papers: [All Options on the Table Urban Water Supply Options for Australia](#) and [All Options on the Table Lessons from the Journeys of Others](#). WSAA's policy positions in these papers is explicit: no water supply option on its own is likely to meet all the needs of a city or regional town: the reality is that combinations of options need to be considered, and no option should be discounted. While each Australian community should consider all options on the table within their local context, our research has shown that purified recycled water provides an affordable option that will be crucial in planning for a more liveable future for our communities. This view is supported by the more than 35 cities around the world that have now adopted purified recycled water as part of their drinking water supplies.

The Draft Water Cycle Climate Change Action Plan 2022-2026 is a strong document that sets out a number of exciting and, we hope, potentially game-changing actions for the future. We wish the Victorian Government well for the future implementation.

Kind regards



**Adam Lovell**  
Executive Director