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MEMBER FOR MOLONGLO

Mr Malcolm Gray
Senior Commissioner
Independent Competition and Regulatory Commission
via email: icrc@act.gov.au

Dear Mr Gray

Thank you for the opportunity to make a submission in response to the Issues Paper on Secondary Water Use in the ACT.

Triple bottom line assessment

As the Issues Paper notes, a holistic analysis of recycled water initiatives requires consideration of the economic, environmental and social costs and benefits. The ACT Greens support the discussion paper issued by Government on this topic (*Triple bottom line assessment for the ACT Government*) and are pleased that the Issues Paper refers to the document.

In relation to question 9 in the Issues Paper that asks “what are the key economic, environmental and social factors relevant to the Commission’s inquiry into recycled water?”, the ACT Greens believe the best approach would be to take into account any of the criteria listed that are impacted upon, either positively or negatively. This is a slightly different approach than appears to be suggested in the question where the emphasis is placed on ‘key’ factors.

We believe the paper from the ACT Government *Triple bottom line assessment for the ACT Government* endorses the approach we suggest where it states:

The first part of the TBL assessment process is to identify any criteria against which the proposal will have an impact, positive or negative. These criteria are laid out in the TBL preliminary assessment matrix (table 1). The assessment is not detailed, but reflects a judgement on the basis of the information already available.

The response to each criterion would be a simple ‘yes’ or ‘no’.¹

What this approach requires in practice is for each of the criteria listed on page 10 of the Issues Paper to be examined and a determination made as to whether the individual criteria is impacted. This would require conscious deletion of any factor that is not impacted, rather than an approach where only a small number of major impacts are taken into account.

The ACT Greens believe that adopting the approach suggested in the *Triple bottom line assessment for the ACT Government* would ensure a comprehensive methodology is followed which delivers the most robust and reliable result.

¹ *Triple bottom line assessment for the ACT Government* , page 20

Thus, when calculating the cost-benefit of the urban waterways project, it is important not to simply count the cost/GL of water storage – this is where a triple bottom line analysis comes into play. The side benefits of improving habitat for local wildlife, and relaxing places for people to sit, enjoy and play should not be discounted, but are not included in the Government’s triple bottom line list of criteria. Asking local residents and visitors to the wetlands about the value of the wetlands to their lives is also key.

Secondary water use generally

Essentially, the Greens believe that it is best if we use our water wisely, and find opportunities to re-use water in the appropriately least processed state as often as possible.

Generally, the shorter the distance the water has to be piped to from collection points, the better, however, there are many exceptions to this rule, depending on the state of the water in terms of potability.

Although the Issues Paper notes that our dams are now close to capacity, the ACT Greens think it is important that we plan for long term resilience, given the climate change predictions for a hotter drier area, and this will mean building in a range of water efficiency measures, as well as a diversified range of storage places and delivery methodologies.

Rainwater tanks

The inquiry provides a unique opportunity to examine the efficiency of government subsidies for water tanks under point (2)(b) of the terms of reference.

There are arguments sometimes raised that subsidies for tanks are not the most efficient measure open to government to provide water to households, particularly in an inland city where water is generally returned to stormwater drains or ground water after it is used, regardless of whether it is sourced from a dam or a tank. We believe that this is an unresolved issue that the inquiry is well placed to investigate. A comparison of the economic, environmental and social costs and benefits of subsidies for tanks compared to other options like precinct level ponds, or larger storages like the Cotter Dam would be valuable.

Non-potable water

Generally, the Greens support the use of recycled water for non-potable use, such as gardens, toilets, playing fields, etc.

Regarding question 2 which asks “Are there any barriers or impediments to businesses supplying commercial recycled water services in the ACT?”, it has been frustrating to hear from various developers about their efforts to reduce water use in their estates, but not having Government support or encouragement. It may be worth contacting Madison about their difficulties in using non-potable water at the West Belconnen Golf Course.

The Village Building Company (VBC) have also had problems, which they were unable to overcome. VBC wanted to use non-potable water in West Macgregor, but they had difficulties getting agreement from the ACT Government agencies. I understand that ACTPLA had agreed, but the negotiations between TAMS and ACT Health become complicated with the end result being that nothing could be agreed to. This was frustrating given that VBC have planned a third pipeline for Tralee, and CIC will be using recycled non-potable water with purple pipes for gardens and toilets at Googong, which is expected to contribute to a 60% reduction in urban water usage.

These frustrations experienced by developers also relate to question six which asks “What is the scope for efficiently increasing the use of greywater in the ACT?”.

Ensuring better and greater coordination between the ACT Government bodies on this issue (for example ACT Health, ACTEW, ACTPLA, ESD and TAMS) is one way to facilitate greater use of grey water.

We need to make it easier for companies, such as developers and industrial companies to be innovative in their water reduction, conservation and re-use efforts. It is always a shame when bureaucratic rules become an obstacle to sustainable innovation, when similar practices are in place in other jurisdictions, especially just over the border, in Googong and Tralee.

Although the proposal for a third pipeline to the new suburbs of Molonglo was not pursued, it is disappointing that more effort has not been put into ensuring that the suburbs are built with the best urban water usage practices available. This could mean precinct-wide water storage, along with purple pipes to households, such as at Googong.

The Water Sensitive Urban Design Guidelines (WSUDG) should certainly allow for a broader range of non-potable water use or water reduction measures, such as purple pipes into households, greywater systems, waterless urinals and composting toilets.

Note that the WSUDG requiring significant water reduction measures could probably easily be increased to more than 40%. This must be fairly easily achievable, noting that CIC is intending to do this at Googong by reducing water use to 60% less. It is also important to note that precinct-wide water storage, such as O'Connor Wetland, was largely funded by the developer, and this is a good model for further water storage infrastructure funding. This does not need to be confined to wetlands, but also to large precinct-wide tanks and dams, and purple pipes to households, etc.

I would be interested for the inquiry to examine the increased economic efficiency gained when more stringent water-saving measures are rolled out when opportunities arise (such as through the estate development planning and development application processes), rather than waiting to retrofit later in the life of infrastructure.

Clarification

One point I would be interested to see clarified in the draft report is whether aquifers and bores are capable of providing potable water. The flow chart on page 6 of the Issues Paper currently classifies aquifers/bores as non-potable water. My understanding is that generally the water from ACT bores and aquifers is drinkable

Thank you again for the opportunity to comment on the Issues Paper and I look forward to engaging again in this important issue when the draft Report is issued in 2012.

Yours sincerely



Shane Rattenbury
21st December 2011
ACT Greens Water Spokesperson