

By Email

SUBMISSION TO THE ACT INDEPENDENT COMPETITION AND REGULATORY COMMISSION
ON ITS DRAFT REPORT *SECONDARY WATER USE IN THE ACT, MAY 2012*.

By Jack Kershaw
May 25 2012

Dear ICRC

This draft report seems to be admitting that the ACT, or Actew, to be more precise, has a major problem because of overkill, mistakes, and accidents in the planning, budgeting, contract structuring, and installation of new primary water collection and storage measures, notably the Enlarged Cotter Dam (ECD). The report therefore seems to favour Actew's commercial imperatives (owning all local primary water and selling it at a profit) over sensible and environmentally responsible government and private secondary water initiatives.

Flowing from that, the report seems to conclude that it is necessary to cut back on, and probably never install planned secondary measures, especially the new wastewater recycling plant at the Lower Molonglo Water Quality Control Centre (sewerage works) (LMWQCC). That new recycling plant is practically invisible in the report, but is clearly targeted.

The Cotter Dam money/time blowouts, exacerbated by the floods, have clearly massively and inordinately sapped funds and resources, and many, including the ICRC, say the project was always too big and too expensive. Those mistakes and blowouts should not jeopardise important and desirable secondary water measures. Essentially, the Cotter Dam enlargement project needs to be terminated now.

A very important related factor has apparently not been considered adequately in the report, namely, the water quality of Canberra's premier decorative and symbolic water feature, Lake Burley Griffin (LBG).

That sublime, large but shallow lake basically relies on the flow of Molonglo River and a couple of short creeks, and that's not much. Environmental flows from the vast but slow-filling Googong Reservoir in the primary water system, which feed into LBG are apparently proving to be more and more inadequate. Significantly increasing them in quantity and frequency could be the best way to maximise the water quality of the lake, and to therefore optimally realise its decorative, symbolic and recreational potentials.

The ACT with the Commonwealth has a major responsibility to make that happen.

(Many say that the water quality of Canberra's other major lakes is also in dire straits, and that increased flows into them would be the best "cure". Ostensibly, they were meant to provide the amenity of LBG in the satellite town centres, but their basic [laudable] engineering function is to act as silt traps for the Murrumbidgee River - no wonder they're polluted, especially with algal blooms etc. Those lakes are also not fed by major water courses, so piped water to their upper reaches could assist markedly. This could work in the case of Lake Tuggeranong, but I'm not so sure about Lake Ginninderra. Lake Tuggeranong's

supplemented flows from say a Googong pipe, could be picked up for recycling at the newish well in the Murrumbidgee near the Cotter Pumping Station.)

In order to maintain water storage levels, water so "lost" from those additional Googong flows into Lake Burley Griffin would need to be recaptured. Clearly, the best way to do that is to intercept the flows say near the LMWQCC and send them into the Cotter Dam ready for use in the water supply purification and reticulation system (which includes the Mt. Stromlo works, and back pumping to Googong).

That concept would have much greater efficiencies of scale and therefore economy, if the connecting pipe from the lower Molonglo to the Cotter Dam was the same one from another water capture facility. As it happens, such a facility has been planned for a long time, with even a pilot demonstration version included in current plans. It is of course, the above mentioned threatened new wastewater recycling plant, which would "shandy" its product into the Cotter Dam.

Safety would be equal to or better than Brisbane's existing equivalent plant, and additional useful by-products would continue to be available. Flows down the Molonglo to the Murrumbidgee could be maintained by the ACT not buying so much from the Tantagara Dam on the upper Murrumbidgee. That facility always seemed a doubtful primary water measure in the scheme of things. The flows could actually be increased to the benefit of downstream users, particularly irrigators.

From the tenor of the draft report, the authorities are apparently now saying that the waste water recycling plant is no longer required and cannot be afforded. Well, it could be, if the culprit, the outrageously expensive and environmentally damaging Enlarged Cotter Dam project, is stopped now. From the report's own statistics, the curtailed dam capacity would still be very substantial, would cause less environmental damage, and should be adequate for the above-mentioned "shandying" processes. The physical project termination costs should be relatively low. The fiduciary duties of the partners of the project's deliverer, the Bulk Water Alliance would extend to protecting ACT tax payers from perceived commercial "losses" in connection with the termination.

In any case, it would be folly to shelve the new waste water recycling plant (and many of the other secondary water measures examined in the report). I'm sure most Australians would expect Canberra with its population growing towards 500,000 to do its bit and adopt such an "in-house" secondary water supply measure, as part of its contribution to wider water conservation and distribution measures that can enhance the environment and agriculture of this dry nation, and not completely "bludge" off natural water sources, vitally important to the ecology of the region and to the Murray Darling Basin.

Already, the LMWQCC, itself a secondary system, produces quite high quality water, most of which* is "shandied" into the Murrumbidgee for use down stream, notably, for Gundagai's water supply. This option should be available for Canberra as well, and would be a far more acceptable measure than the Bulk Water Alliance-self-serving, expensive, environmentally damaging full-blown ECD, and/or for instance, the incongruous Tantagara take or the Tennent Dam.

The latter, that vast, remote, shallow, silt-prone dam on the Gudgenby/Naas River system, although ostensibly "shelved", is still on the books. It is in an earthquake zone, and would be

hugely expensive, lose large amounts of water through evaporation, precipitate extensive algal-type pollution, be an unacceptable intrusion into a very sensitive environment and good agricultural land, compromise biodiversity even up into the Namadgi National Park where both rivers rise, and involve major new roadworks etc.

So, a multiple-win scenario emerges from the above analysis, in which:

The overblown self-serving Cotter Dam enlargement is sensibly and responsibly terminated (it needs to happen now);

The new waste water recycling system at the LMWQCC comes into play, economically in the broadest sense, and responsibly in the national perspective;

The capital's centrepiece, Lake Burley Griffin, is made more safe, environmentally and ecologically natural, useable, and attractive;

Other Canberra lakes could be similarly improved;

Works budget outcomes could be "line ball";

Water storage levels can be generally maintained;

The Tantangara take could be abandoned; and,

The lingering Tennent Dam is permanently abandoned.

The draft report should be greatly revised to include the above scenario together with the retention of selected other threatened secondary water measures, if not rejected.

Thank you for the opportunity to comment. (Sorry, I couldn't locate your submission cover pro forma.)

* The draft report seems to conveniently only mention recycled water sent to nearby vineyards and a golf course, surely a small proportion of the total waste water piped into the LMWQCC.

Yours faithfully

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