Concerned Waterways Alliance submission to the Essential Services Draft Decision on the Greater Western Water Price Review 2024.

The Concerned Waterways Alliance (CWA) is a network of community and environment groups from Gippsland to the Otways. We share a deep concern about the degraded state of southern Victoria's rivers, wetlands and aquifers, and are committed to improving their health for the benefit of current and future generations.

We are writing in support of submissions made by our member groups, Friends of Steele Creek and Werribee River Association.

The CWA wish to echo the concerns raised regarding proposed cuts to investment in Water Main Performance Renewals, Asset Ecosystem and Stormwater Harvesting.

Performance Renewals and Asset Ecosystem

Community literacy and aversion toward wasting water is understandably strong. Recognition that water resources are largely sourced from natural systems, many of which are suffering from over allocation and flow stress, continues to grow. Many are surprised to learn that for every 100 litres of drinking water supplied by GWW 10 litres are lost to due to leakage. https://www.gww.com.au/sites/default/files/2023-11/GWW%20ANNUAL%20REPORT%202022-23.pdf

The expectation of the community that water authorities should be constantly striving for the efficient use of resources should be seen as a given. Both leak detection and improving mains infrastructure are efficiency gains which have environmental components and therefore withdrawal of funding will have environmental consequences. Table 57 in GWW's submission shows 'Care of the Environment' as one of the 5 outcomes valued by customers, but it is the only one to receive a markedly poor performance rating.

Table 57 Western Water customer outcomes performance

	2018-19	2019-20	2020-21	2021-22	2022-23	Overall
Fair and affordable charges for all customers	Met	Met	Met	Met	Met	**Met**
Reliable, safe services to existing and new customers	Met	Met	Met	Met	Met	**Met**
Innovative approaches to addressing customer needs	Met	Met	Met	Met	Met	**Met**
Care of the environment	On track	On track	On track	On track	Not yet met	**Not yet met**
Sustainable contribution to the community and regional liveability	Met	On track	Met	Met	On track	**On track**
Overall	**Met**	**Met**	**Met**	**Met**	**Met**	**Met**

Water efficiency gains from improved mains maintenance and leak detection speak directly to the notion that our water supplies are precious, valued by community, and come at an environmental cost. The outcomes of increased efficiency are positive, with little disadvantage to customers, but having meaningful benefits for the environment.

The issue of efficiency and leakages were extensively addressed in the Central and Gippsland Sustainable Water Strategy (CGRSWS). Actions 2-1, 2-2, 2-3, 2-4, 2-5, 2-6, 2-7 and 2-8 all raise expectation that water authorities, the community and indeed the ESC, will work together toward advancing efficiency measures.

Action 2-8:
Targets for reducing urban water system leaks

Urban water corporations will

• set targets (where possible) for managing distribution system leaks and losses, which consider the broader social and environmental costs and benefits

*• work with the **Essential Services Commission**, Bureau of Meteorology and Water Services Association of Australia to review annual leakage reporting and increase transparency and benchmarking of leakage performance.*

It would be undesirable if reviewing "annual leakage reporting and increase transparency and benchmarking of leakage performance" was the extent of the assumed responsibility. Significant investment is required to respond to leakage performance rather than to simply note it.

The CWA recommends that the ESC and GWW work together to ensure that efficiency and leakages are addressed and properly funded through this process.

The CWA deem it unfortunate that in their submission GWW chose not to include "We heal and care for Country" as a supported customer outcome of improvement measures. See example below.

Appendix G

Appendix G: Capital programs

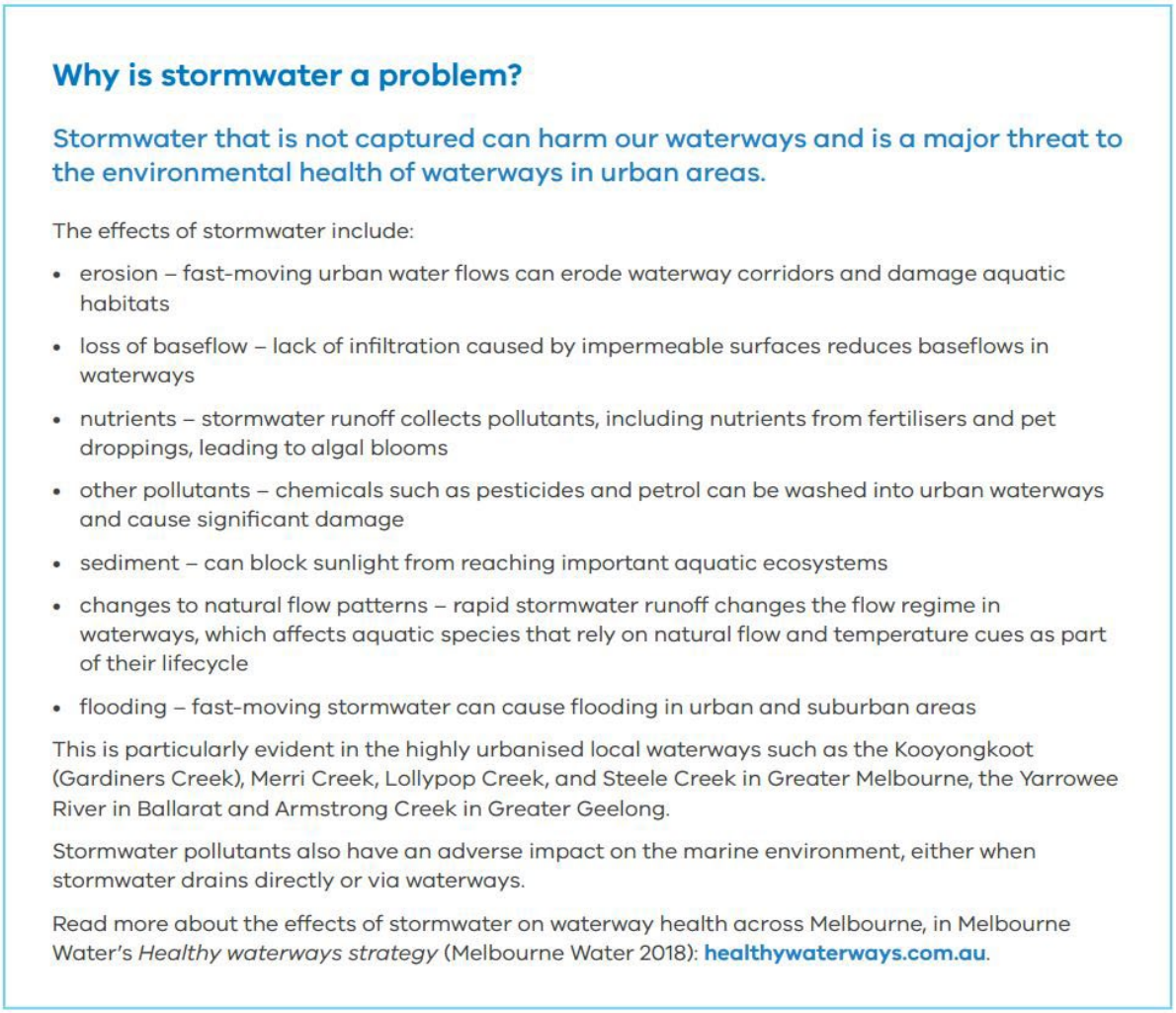
Programs of works outside of top 10 major projects ($million, 2023-24).

Service	Program	Objectives of the program	Customer outcomes supported	Capital Expenditure
Water	Water Main Performance Renewals	Provide a reliable water service to customers by: Preventing customers from exceeding >5 interruptions in a rolling 12-month period Stabilising water main failure rate at current levels in the PS5 period	Your water is safe consistent and resilient. When things go wrong, we fix them	197.66

Strom Water Harvesting

The CWA supports the contention of the Friends of Steele Creek that the cuts to future investment in stormwater harvesting are "unfathomable". The draft ESC response indicates that *"given that Greater Western Water was unable to provide or identify individual projects or stormwater harvesting business cases for review, meaning that underlying prudency and efficiency cannot be assessed."* However, the nature of this investment which requires investigation and collaboration with other parties including local government means the expectation that there be bespoke projects ready to be assessed by the ESC is unrealistic.

Again, the CGRSWS is quite explicit on the need to move forward on stormwater capture and reuse. It rightly flagged the numerous environmental concerns and risks posed by stormwater to our waterways.



Why is stormwater a problem?

Stormwater that is not captured can harm our waterways and is a major threat to the environmental health of waterways in urban areas.

The effects of stormwater include:

- erosion – fast-moving urban water flows can erode waterway corridors and damage aquatic habitats
- loss of baseflow – lack of infiltration caused by impermeable surfaces reduces baseflows in waterways
- nutrients – stormwater runoff collects pollutants, including nutrients from fertilisers and pet droppings, leading to algal blooms
- other pollutants – chemicals such as pesticides and petrol can be washed into urban waterways and cause significant damage
- sediment – can block sunlight from reaching important aquatic ecosystems
- changes to natural flow patterns – rapid stormwater runoff changes the flow regime in waterways, which affects aquatic species that rely on natural flow and temperature cues as part of their lifecycle
- flooding – fast-moving stormwater can cause flooding in urban and suburban areas

This is particularly evident in the highly urbanised local waterways such as the Kooyongkoot (Gardiners Creek), Merri Creek, Lollypop Creek, and Steele Creek in Greater Melbourne, the Yarrowee River in Ballarat and Armstrong Creek in Greater Geelong.

Stormwater pollutants also have an adverse impact on the marine environment, either when stormwater drains directly or via waterways.

Read more about the effects of stormwater on waterway health across Melbourne, in Melbourne Water's *Healthy waterways strategy* (Melbourne Water 2018): **healthywaterways.com.au**.

The CGRSWS is one of Victoria's pivotal water policy documents. Action 3-4: "Investigating options for large-scale recycled water and treated stormwater networks in Greater Melbourne" is clear on the obligations for water authorities. They are to "investigate the feasibility of large-scale recycled water and treated stormwater networks to meet a range of uses and values in Greater Melbourne" and "Commence development of business cases for the feasible, large-scale networks.". This is to happen by 2025, well within the upcoming pricing period.

The CWA recommends that the ESC be fully cognizant of the responsibility on water corporations to increase stormwater harvesting and accept that funding to advance this Action cannot be as prescriptive as other initiatives.

For further information, please contact [redacted]

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