



Stormwater
INDUSTRY ASSOCIATION (QLD) INC.

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29 March 2013

Department of Energy and Water Supply

PO Box 15456

City East, Queensland 4002

Dear Sir/Madam,

RE: Submission – 30 Year Water Sector Strategy Discussion Paper

The Stormwater Industry Association of Queensland (SIAQ) is the peak stormwater industry body in Queensland. The purpose of the SIAQ is to promote the efficient management of stormwater in order to:

- manage flooding
- maintain environmental values of receiving waters
- enhance community amenity
- achieve the cost effective management of stormwater infrastructure
- encourage a whole of water cycle approach to stormwater management

The SIAQ would like to congratulate the Queensland Government on taking the initiative to develop a long term strategy for water management in Queensland. The SIAQ thanks the government for the opportunity to comment on the 30 Year Water Sector Strategy Discussion paper, and provide input to the strategy that is ultimately developed.

Having a long term strategy for water management in Queensland is important to the SIAQ and its members because it provides the industry with a clear direction and helps our association to promote efficient management of stormwater to achieve the set vision and strategic intent for water in Queensland over the next 30 years.

In this response we will address 6 topics:

- Scope
- Vision
- Total Water Cycle Management
- Future water resources – rainwater and stormwater
- Calculating ‘least cost’
- Regulation

Scope

The Ministerial Statement on page i of the discussion paper states that:

‘Every Queenslanders expects and relies on secure supplies of high quality water and sewerage services to support their livelihoods and lifestyles. In 2012 there is in expectation that these services will be provided without detriment to the natural environment, at the lowest possible cost, by skilled and accountable professionals.’

The discussion paper describes the water sector as including ‘activities such as water supply, natural resource management, land use planning, public safety and environmental protection’ (Page 5).

The discussion paper raises the topics of Total Water Cycle Management and Water Sensitive Communities and Regions (i.e. Water Sensitive Urban Design) (pages 9 and 10).

From these statements the scope of the 30 Year Water Sector Strategy appears unclear. On the one hand it has a strong emphasis on water supply and sewerage; however by raising the topics of Total Water Cycle Management and Water Sensitive Urban Design, other aspects of the water cycle (e.g. stormwater quality and quantity management, flooding and waterway health) are incorporated into the strategy.

The SIAQ recommends that the 30 Year Water Sector Strategy clearly articulate to which aspects of the water cycle it applies and why. Failure to do so will confuse future potential users and decrease the overall effectiveness of the strategy in the future.

The SIAQ recommends that one of the following options be adopted. The strategy should apply to:

- All aspects of the water cycle equally, and be derived from the principles of Total Water Cycle Management; or
- Only water supply and sewerage but use a Total Water Cycle Management approach to raise other aspects of the water cycle (e.g. stormwater harvesting or catchment rehabilitation) as they apply to water supply and sewerage.

We recommend the first option. The 30 Year Water Sector Strategy should not apply only to the water supply and sewerage sectors with no consideration of other aspects of the water cycle as this would preclude future attempts to undertake Total Water Cycle Management, and well as eliminating opportunities for nutrient offsetting and other such endeavours which are currently of interest to the sewerage sector.

Vision

The discussion paper proposes the following vision for the water sector:

‘To create a Queensland water sector with the capability to deliver integrated catchment based recreation, water supply, sanitation, irrigation and environmental services at lowest cost.’

While all the aspects of this statement are true and desirable, we contend that some aspects of this statement are better suited as methods to achieve the water sector’s vision, rather than as the vision itself.

The SIAQ proposes that the vision for the water sector may read more like this:

To create a Queensland water sector that delivers water services¹ that support Queensland’s way of life in a manner that is environmentally, socially and economically sustainable both now and in the indefinite future.

¹ the definition of ‘water services’ will vary depending on the scope of the 30 Year Water Sector Strategy as discussed previously.

The following (amongst many other options) then become possible methods for achieving our vision

- Building the capabilities of the water sector; and
- Integrating catchment based recreation, water supply, sanitation, irrigation and environmental services.

The SIAQ believes this is an important distinction because the vision must engage stakeholders with the strategy. To do this it must be both inspirational, and speak to all stakeholders. The vision as proposed in the discussion paper does not do this. We believe our proposed vision provides a good starting point for the government to define an inspirational vision.

For background on this matter, we recommend viewing [Simon Sinek's TED talk on 'the Golden Circle.'](#) To borrow from Sinek's idea, we recommend that the 30 year vision for the water sector appeals to 'why' we should manage water. At present the vision tells us 'how' and 'what' we do.

Total Water Cycle Management

As discussed above in 'Scope', the discussion paper raises Total Water Cycle Management and other linked terms such as 'integrated planning' and 'catchment wide' as an approach to encourage cost effective and innovative solutions to water sector challenges.

Total Water Cycle Management Planning undertaken by local governments and utilities such as that undertaken by Moreton Bay Regional Council (MBRC) has demonstrated the potential to identify least cost solutions for achieving water sector outcomes.

Through collaboration with key stakeholders, the detailed Total Water Cycle Management planning process for MBRC identified preferred catchment management actions based on triple bottom line principles to sustainably manage water resources, including the protection of waterway health, and meet legislative requirements of EPP Water 2009. The final outcome demonstrated that if the plan was implemented, approximate cost savings of over \$800 million dollars would be possible for Council, when compared to previous cost estimates for Council's water cycle infrastructure requirements.

The SIAQ supports this approach and would welcome it being further strengthened via the 30 Year Water Sector Strategy. A key recommendation for improving the Total Water Cycle Management planning process is to establish a head of power, such as the Department of Energy and Water Supply, responsible for co-ordinating the planning process and facilitating stakeholder engagement and collaboration.

Future water resources – Rainwater and stormwater

As outlined in the discussion paper, the SIAQ agree that currently Queensland has limited use of alternative water supplies (such as stormwater and rainwater) and in the future we need diverse and reliable water supplies that are adaptable and resilient to climate change and future changes in water needs.

The SIAQ believes that alternative water sources such as stormwater and rainwater harvesting play an important role in providing fit for use diverse and reliable water supplies that should be recognised in the strategy. Some of the potential benefits of using these alternative water sources include:

- Reduction of key waterway pollutants (including sediment and nutrients)
- Benefits to waterway ecological health
- Delayed augmentation of water supply infrastructure
- Reduced operation and renewal costs of infrastructure
- Security against climate change
- Flood mitigation
- Social / amenity value of using alternative water sources (such as rainwater) to keep gardens green in times of drought/ water restrictions.

As mentioned previously, it is important that that a whole of catchment Total Water Cycle Management planning approach be applied to determine least cost future water supply options that also take into consideration the benefits to the community and the environment that alternative water sources such as stormwater and rainwater may provide.

Calculating 'least cost'

As discussed above, the SIAQ believes that the determination of 'least cost' solutions needs to include assessment of costs to the community and the environment, as well as to the economy. We suggest that this should be clearly recognised in a documented definition of 'least cost' in the water strategy.

We would also suggest that there needs to be better assistance/ guidance given to the industry in costing environmental and social benefits /externalities to ensure true 'least cost' water solutions (that also account for the environment, community and economy) can be more readily determined.

Regulation

The discussion paper introduces the concept of 'light handed regulation' (page 1). 'Light handed regulation' however is not defined. Industry, the community and local government are uncertain about what is meant by 'light handed regulation.' Does it for example mean:

- Greentape reduction?
- Reducing regulatory burden?
- Shifting responsibility for regulation to local government?
- Removing regulation altogether?
- Self regulation?

The SIAQ believes that regulation is necessary; however it can be either positive (when appropriately designed and/ or enforced) or negative (when inappropriately designed and/ or enforced). The purpose of

regulation is to produce a desired outcome that was not being achieved without the regulation in place. The success (or otherwise) of regulation is a combination of the outcome produced by the regulation, and the effort required to comply with and enforce the regulation (see Equation 1).

Equation 1

$$\textit{Success of regulation} = \frac{\textit{Quality of outcome}}{\textit{Effort to enforce or comply with regulation}}$$

In this manner, successful regulation can be produced by both stringent regulation that produces exceptional outcomes and simple regulation that produces moderate outcomes. In an ideal world successful regulation is produced by simple regulation that produces exceptional outcomes.

The SIAQ contends that the ‘light handed regulation’ advocated in the discussion paper picks up only half the equation (effort to enforce or comply with regulation), and ignores the quality of outcome achieved.

The SIAQ suggests that instead of advocating ‘light handed regulation’, the 30 Year Water Sector Strategy should advocate appropriate, successful regulation which is defined as a combination of both the:

- Quality of outcome achieved, and
- The effort to enforce or comply with the regulation.

Conclusion

Thank you again for the opportunity to comment on the 30 Year Water Sector Strategy Discussion Paper and provide input to the 30 Year Water Sector Strategy itself. We look forward to seeing a draft strategy mid-year.

Yours Sincerely



Nicole Ramilo

President

Stormwater Industry Association Queensland