



29 August 2013

The Manager
Water Policy
Environment and Sustainable Development Directorate
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Dear Sir or Madam

The Inner South Canberra Community Council (ISCCC) appreciates the opportunity to comment on the ACT Government's Draft ACT Water Strategy.

The ISCCC recognizes the achievements made since the initial preparation of *Think Water Act Water* (TAWW) and agrees that this review and update is timely. The 30 to 50 year term of planning is appropriate.

The ISCCC also recognizes that water management is a complex and important matter and we endorse the concept of integrating the management of all aspects of water resources.

Overall, the ISCCC considers the Draft Strategy to be appropriate but could be improved as follows.

Our comments fall into two categories – firstly content, and secondly terminology, definitions and presentation.

Content

General

The Draft Strategy has appropriately high-level statements about general principles relating to water management in the ACT region. The ISCCC considers that most of the debatable issues will be in the next stage when detailed action plans are developed.

The Draft Strategy would be improved if the water supply parameters were clearly quantified, rather than scattered throughout the document or relegated to an Attachment. For example, there should be a strategy to determine the *per capita* consumption goal. The Minister states that one of the objectives is to “increase the efficiency of water usage by reducing *per capita* use of mains water”. However, there does not appear to be an action plan to determine what this should be or whether any further cuts in *per capita* consumption are needed. This situation should be clarified.

There is little reference to highlighting, quantifying and managing risk factors such as possible changes to the Lower Molonglo Water Quality Control Centre (e.g. salt management), catastrophic events and failures or changes in other Governments' policies. We recommend that a risk management plan should be specifically included as one of the Actions. The risks may or may not be significant but this should be made clear. Furthermore, as a relatively small and vulnerable jurisdiction potentially impacted by actions of the Australian, NSW and other governments and adjoining

local councils, it is recommended that the risk management plan includes political risks, and how these could be mitigated.

Section 1

The three Themes are good and cover the main issues dealt with in the document.

We have two suggestions to improve this Section.

1. We recommend that the wording of the drivers' sections be re-worked. At present these mostly represent un-measurable objectives. For example "maximizing liveability" is a goal rather than a driver, and it is not clear how it would be known that the goal had been achieved.

2. We recommend that the Vision be re-worked. The current version:

'A community working together to manage water wisely, to support a vibrant, sustainable and thriving region.' describes a process or a series of actions rather than a vision. It would be possible to work together to manage and support without achieving appropriate outcomes; far better to have a vision that encompasses clear, beneficial outcomes that can be measured.

Section 2

This section states that "A complete review of Think water, act water (TAW) has been undertaken. The findings and recommendations of the complete review of TAW inform major components of the draft Strategy." and that "The outcomes of the review and significant national initiatives will greatly influence the direction of the draft Strategy and will be incorporated into the final document". These two statements seem inconsistent – does the draft Strategy contain all the influences or will there be something quite new in the final document? Or is this just a matter of finer detail?

There does not seem to be any reference to the National Capital Authority's interest in this. Should there be?

Section 3

The terminology in this section for the 'strategies' should be re-visited. Several of these appear to be goals and some of the actions seem to be strategies (see terminology, definitions and presentations, below).

The fourth action under Theme 2 Strategy 5 is to 'establish an integrated water service provider'. While there are many good reasons to do this, there is a risk that there might not be sufficient external accountability to ensure that, for example, potable water supply receives appropriate support compared with environmental flows.

Section 4

There are only a few general references to groundwater and mainly in the context of the Murray Darling Basin System. Although groundwater currently plays a small role in providing water to the ACT, it is crucial in the context of the environment and the



management of water quality in our lakes and wetlands. It also contributes to our total water resources. During droughts, or if the price of surface water rises steeply, it will become more important. There is no indication that the capacity of groundwater in the ACT is known, or how it should best be managed. If it is not significant, the document should indicate this.

The role of the Tantangara Dam should be clarified. Is it supposed to be a regular source of water for the ACT region, which we pay for on a regular basis, or is it seen as an emergency source to be used infrequently?

One of the most significant factors relating to the Canberra region's water supply is the abstraction limit of 40.5 GL specified under the Murray-Darling Basin (MDB) Plan. We understand that at present we return about half of our abstracted amount into the MDB. Therefore, if we maintain this rate of return, by 2060, when the population is estimated to be about 800,000, we can still have an annual average extraction rate 80 GL/yr. This amounts to a *per capita* consumption of about 100 kl/yr, which is what the consumption currently is. Consequently, there needs to be strong evidence to support any reduction in the *per capita* consumption. And if so, then to what level. In other words there needs to be a *per capita* consumption goal.

Section 5

Although wetlands and lakes are included in the report, there could be more emphasis on water quality in these areas and what is being done to eliminate eutrophication due to run off in an urban environment. Lake Burley Griffin and the other larger lakes are magnificent recreational resources and presumably the ACT government would aim to keep them open for use all the time.

In recent years, the ACT has invested considerable resources into the Jerrabomberra wetlands. We would not want to see these ruined by pollution from runoff.

Key parameters should be quantified

There are many references to general, quantitative changes such as *minimizing*, *optimising*, *improving* and *best outcome*. For example on page 11, the draft Strategy calls for "improved urban water quality outcomes." This implies that the present water quality is unsatisfactory. Critical factors that can be measured and are requiring improvement should be identified. The Strategy should include high level targets with more detailed targets relating to the action plans. It should also include specific performance measures for each action.

Terminology, definitions and presentation

The overall structure of the document is confusing, partly due to repetition. The themes, outcomes, strategies, actions and activities could be more concisely presented.

Of particular concern are the appropriateness and various uses of the word "strategy". A strategy is a carefully devised plan of action to achieve a goal. The document itself is called a draft Strategy; each outcome has key strategies and several of the strategies



are really objectives.

For example Strategy 1 on page 11 is ‘Achieve better river health and environmental flow outcomes’ This is not a strategy, it is an objective and it is a very poor objective because it does not specify how much better.

On page 13 Strategy 6 is ‘Secure long-term water supplies’. This is an objective.

The Actions listed in the document are mostly Strategies, and sometimes objectives. For example, the Action: ‘Optimise integration of water sources and flexibility of supply options, including intra- and inter-state water trading (page 13),’ is another objective. An action should articulate what is going to be actually done.

We therefore recommend that the terminology be re-visited so that the various outcomes, objectives, strategies and actions are consistent throughout the document.

The ISCCC looks forward to further participation in subsequent iterations of this Strategy and action plans.

Yours sincerely

Gary Kent
Chairperson

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