



**WATER SERVICES  
ASSOCIATION OF AUSTRALIA**



**WSAA SUBMISSION TO  
DCCEEW'S DISCUSSION  
PAPER: CONSULTATION ON  
THE DRAFT PRINCIPLES OF A  
NATIONAL WATER  
AGREEMENT**



# **WSAA submission to Discussion Paper: Seeking views on a future National Water Agreement (September 2024), Draft Principles**

The Water Services Association of Australia (WSAA) thanks the Department of Climate Change, Energy, the Environment and Water (DCCEEW) for its work in releasing [the National Water Agreement Discussion paper](#) (NWA Discussion Paper), and continuing to progress development of a National Water Agreement. We provide some comments in response to the proposed Principles below. We note that DCCEEW are particularly seeking views on climate change (Objective 6 and throughout); urban water (Objective 1 and throughout); and science knowledge and partnerships (Objective 4 and throughout).

Water Services Association of Australia (WSAA) is the peak body representing the water sector. Our members provide water and wastewater services to over 24 million customers in Australia and New Zealand and many of Australia's largest industrial and commercial enterprises.

## **Overall feedback**

We support the overall intent of the proposed Principles. In broad terms, they align with the water sector's core priorities. The Principles reflect the Objectives and Outcomes already identified in earlier rounds of consultation.

In particular, we would like to voice our support for the principles around First Nations involvement, ownership, recognition and respect. These are well-elaborated and address their omission from the last Agreement. We support many of the Principles that have been continued from the 2004 Agreement. We are pleased with the explicit reference to regional, rural and remote areas having access to water services even if service costs are higher. We welcome the mention of skills and training; while minimal, we believe that this provides a good foundation for the Action Plans ahead.

We would like to seek clarification on whether the National Urban Water Planning Principles (2008) will be reviewed.

Our detailed feedback will outline particular areas that we feel can be strengthened. We have focused our comments on three key areas:

1. We would like to see skills and training elevated from a guiding Principle to an identified Objective, given the scale of investment and capital works that is forecast within the industry over the next five to ten years.
2. We would like to see the NWA explicitly call out the need for proactive community engagement and community awareness efforts on the 'water transition' toward greater incorporation of rainfall independent sources of supply.
3. While the Principles talk about water efficiency in broad terms, the focus on water efficiency at a business and household level that was present in the 2004 Agreement has lessened. We would like to see continued support in the NWA for both Smart Drop Certified, formerly known as Smart Approved WaterMark (SAWM) and Water Efficiency Labelling and Standards (WELS).

A number of the issues raised in the Agreement, that the drafted Principles are seeking to address, come with a great sense of urgency. We do not feel that the current Agreement's requirement for the states and territories to draft an Action Plan within two years adequately addresses this urgency. When signing on to the Agreement, we would like to see a list of

agreed upon actions that are assigned to or picked by each state and territory, that they must commit to implement within two years. We propose items 1 and 2 below to be considered as areas of focus for this. We believe that seeing tangible progress will be of benefit to the states and territories before they design their Action Plans, as well as the communities they serve.

Finally, we note that incentives have worked in the past for states and territories to sign on to national agreements. We believe that in principle, there is merit for incentives to apply for this National Water Agreement. We suggest incentives linked to specific Outcomes, Objectives and Principles, and in particular skills and training, would help pave the way for the road ahead.

## **DETAILED RESPONSES**

### **1. Water industry skills and training**

We welcome the inclusion of Principle 1.13 in the Principles. Given this is an ongoing challenge for the water sector and foundational to the success of the water sector's ongoing operations, we believe it is worth elevating it to an Outcome. Capital expenditure is estimated to double over the next five to ten years but the industry is seeing gaps in accessing skilled resources to plan, operate and maintain existing and new assets. At a minimum, we would like the inclusion of an objective to have 'water and sanitation as essential services' delivered by a skilled and capable workforce. Skills must be transportable across the country with a focus on capacity and capability development for regional areas and a focus on culturally sensitive approaches for remote First Nations communities.

### **2. Public communication and transparency**

Principle 1.06 requiring *consideration of all options including climate resilient sources, based on a transparent assessment of all costs and benefits, including identifying and addressing barriers to use* is a good start. However, we would like to see more concrete principles around the need for proactive education and engagement on future water supply options throughout the Principles and the Objectives and Outcomes. We recommend that this Principle be taken a step further to connect transparency with benefits for the community, reducing the burden on water utilities and leaders.

It is important for the community to understand that society as a whole is going through a water transition, just like we as a society are going through an energy transition. The water transition is towards incorporation of rainfall independent sources of supply that give resilience, protection from droughts, floods, and heatwaves. For generational shifts like this we need to proactively engage with, and educate the community – this will take time, and we want to set our sector up well to face this.

To meet Objective 5 we must call out community engagement and public awareness as a key Outcome. We would like to see the NWA make a more proactive requirement on community engagement to support the water transition. This needs to extend beyond having conversations with the community prior to building a new asset. To support this, we would like to see Principle 5.1 reworded as a statement as to what best practice engagement looks like, as defined by DCCEEW.

Principles 5.6 and 5.7 speak of a passive approach to engaging with the public. We would like to see this reframed as proactive engagement led by the water sector. This is an opportunity to empower our states and territories to lead conversations on what Australia's water future looks

like and the role of an individual in this.

### **3. Water use efficiency (demand management)**

We are disappointed that only two Principles in the draft Agreement that speak to water efficiency, which is less than what was included in the 2004 Agreement. Acknowledging at this time, water conservation was front of mind with the southeast of Australia amidst the millennium drought (2001 to 2009). The NWA should pursue this same sense of urgency that water efficiency is as great a priority, and as relevant now as it was in the 2000s.

WSAA would like to see Principle 7.35, *The promotion and conduct of water demand management practices to conserve water supply and quality and to adapt to any future water supply vulnerability*, included as an Outcome, in addition to a Principle, as water efficiency on a business/household level is not adequately covered in the current Objectives. We feel that a principle on water efficiency in an urban context specifically is needed.

It is good to see some focus on water efficiency at a household and business level in Principle 7.36 and we are pleased to see the continued commitment to WELS. However, we would like to see this expanded to cover Smart Drop Certified, formerly known as Smart Approved Water Mark (SAWM). SAWM was named in the 2004 National Water Initiative and we feel that this is a missed opportunity to not include it in the 2024 Agreement.

The SAWM and WELS programs are popular with consumers and the community. They have a well understood purpose, their use is easy to understand and they have evolved in the last 20 years to include a growing range of products and focus areas. We maintain our recommendation to continue to implement WELS and Smart Drop Certified, formerly known as SAWM, also seeking continued refinement of their product range and coverage to maximise potential water efficiency gain.

### **Contact**

WSAA welcomes the opportunity to discuss this submission further.

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