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Commissioner  
National Water Reform  
Productivity Commission  
Lodged online

24 March 2021

Dear Commissioner

## Submission in response to National Water Reform

The Business Council for Sustainable Development Australia (**BCSD Australia**) welcomes the opportunity to make this submission to the Commission

We would also welcome the opportunity to speak directly on these points at the appropriate time.

Andrew Petersen  
CEO | **Business Council for Sustainable Development Australia**

We refer to the Findings, Recommendations and Information Requests made in the 11 February 2021 Draft Report. We respond below.

Items	BCSD Australia responses
Finding 4.1	Agree
Recommendation 4.1	Agree
Information Request 6.1	<p>Growing competition for water demands immediate action and a steep change in the way that companies manage water.</p> <p><b>Valuing Water:</b> Valuing water means recognizing and considering all the benefits provided by water – including economic, social and ecological dimensions. Valuing water helps businesses understand their water impacts and dependencies, eventually informing their water stewardship approaches and leading to the internalization of water-related externalities. Businesses must value water to improve financial performance, ensure business continuity and maintain their social license to operate. Case studies have been developed by WBCSD, and in particular one from BGC/Shell in Queensland.<sup>i</sup></p> <p><b>Targets and Circularity Metrics:</b> Targets should address quantity, quality and impact dimensions and be fully disclosed, whilst metrics should provide actionable insight on specific performance areas. BCSD is collaborating with BIER (Beverage Industry Environmental Roundtable) and the WBCSD Factor 10 project to develop, test and support the application of guidance on water circularity metrics for industry to enable leading water users to compare the water circularity performance of facilities in a quantifiable way and monitor the transition from linear to circular water management. These indicators are included in the <i>Circular Transition Indicators</i> framework and supported through a guidance document and tool. We are also engaging in the Science Based Targets Network initiative on nature, where freshwater is one of the earth systems covered.<sup>ii</sup></p>
Finding 7.1	Agree
Recommendation 8.1	Agree
Finding 9.1	Agree
Finding 11.1	Agree
Recommendation 11.1	Agree
Recommendation 13.1	Agree
Information Request 13.1	<p>Growing research suggests that land and waters managed by indigenous peoples fare much better in terms of biodiversity, but there is still reluctance to commit to this responsible environmental stewardship.</p> <p>In May 2019, the landmark report by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services painted a bleak picture of our planet’s health largely missed one of its key findings: lands and waters that are owned, managed, and used by indigenous peoples and local communities are much healthier than those that aren’t. A growing body of research supports the clear implication that indigenous peoples have a vital role to play in addressing the biodiversity crisis.</p> <p>Recently international discussions about environmental issues have begun to acknowledge the role of indigenous communities. Over the last year, delegates of the 196 parties to the <b>Convention on Biological Diversity (CBD)</b>, in their most recent discussions of the initial draft of the</p>

post-2020 framework, have recognized the importance of including indigenous peoples in the process. This was an apparent nod to the United Nations Declaration on the Rights of Indigenous Peoples, which promotes full and effective participation in all matters that concern indigenous peoples.

Yet, in practice, indigenous peoples continue to play a very limited role in biodiversity discussions. A utilitarian approach to nature: the planet and its ecosystems are little more than a source of material wealth is anathema to indigenous knowledge, culture, and laws – the very factors that explain indigenous peoples' superior record of environmental stewardship.

It means following through and building on the commitments contained in the Declaration on the Rights of Indigenous Peoples to protect indigenous rights and engage fully in discussions of issues affecting them. Canada offers a promising example. In November 2019, the government of British Columbia enacted legislation to implement the UN declaration, enshrining indigenous rights to lands and waters, resources, and self-determination. It is now required in the province to move toward consent-based decision-making and further collaborate with indigenous peoples on any legislative or policy changes that affect their rights. The federal government is set to replicate this legislation at the national level.

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<sup>i</sup> <https://www.wbcd.org/Programs/Food-and-Nature/Water/Valuing-Water/Case-Studies>

<sup>ii</sup> <https://www.wbcd.org/Programs/Food-and-Nature/Water/Resources/Water-Circularity-Metric-Tool-and-guidance-note>