

18 April 2017

Productivity Commission
National Water Reform

via www.pc.gov.au/inquiries/current/water-reform/make-submission

Dear Commissioners Doolan and Madden

Response to National Water Reform Issues paper (2017)

Stormwater Industry Australia Ltd ("Stormwater Australia") is the peak body for the stormwater sector in Australia. Our members and stakeholders are the Australian experts in stormwater evaluation, treatment, and management.

In addition to stormwater, many members and stakeholders of Stormwater Australia are actively involved in multiple aspects of water management, and are well placed to consider how stormwater can be managed for the benefit of Australia.

Our professional assessment is that the best way forward for water management is that it must be properly integrated, and continuation of the National Water Initiative ("NWI") would be the most effective way for this to continue, however it must be recognised that the NWI foundation principles date back to the mid 1990's and there has been significant advancement in knowledge and imperative to effectively manage stormwater. This current triennial review and any recommendations that arise provide an opportunity to effectively 'modernise' the NWI approach to ensure the best mix of water policy instruments into the future are available.

We bring to the attention of the Commissioners that in December 2015, the Australian Senate's Environment and Communications References Committee tabled their "Report on Stormwater management in Australia", and this Report and its recommendations are entirely relevant to the current review of the NWI.

This Report, to which the Government has responded, proposes *inter alia* establishment of a National Stormwater Initiative, embracing development and implementation of a national policy framework for stormwater management.

It also proposes that the Australian Government place water policy on the agenda of an upcoming Council of Australian Governments meeting (CoAG), and that CoAG recognise the benefits that improved stormwater management can provide.

Both of those recommendations were agreed in principle.

While Stormwater Australia has some reservations around the Government's approach to the recommendations of this important Senate Report, and some questions about their approach to implementation of the recommendations, we strongly support both

- development and implementation of a national policy framework for stormwater management, and
- its recognition and support by CoAG.

Accordingly, we believe your review of the NWI should consider the "Report on Stormwater Management in Australia" (and in doing so, the evidence provided to the Senate), the

response of the Government to it, and the incontrovertible need for such a stormwater initiative.

The Productivity Commission is also directed by the Treasurer to consider:

- the scope for improving the NWI, addressing current and future challenges
- broader water policy issues and the role of the NWI in improving outcomes, in particular:
 - the interaction of water policy with other policy areas such as energy, agriculture, planning, urban supply
 - whole-of-cycle water management
 - provision to regional, rural and remote communities, and
 - the economically efficient provision of water infrastructure.

From these directions, it is clear you must consider these recommendations from the Senate Committee, as they fall well within that scope and you cannot fully address that scope without considering stormwater.

You could choose to recommend incorporation of the proposed stormwater initiative into the national water initiative, or you could choose to support a separate stormwater initiative, but we believe you need to address the issue.

However, we are very concerned that any merging of a stormwater initiative into other initiatives will see it subordinated to other process, not given due weight and resourcing, relegated in policy priority, and addressed in an unintegrated fashion. None of these would be acceptable or efficient, nor would they reflect the importance of the issue, recognised, acknowledged, and restated, by the Senate Committee.

We see from the published timeline that the triennial assessment is planning to make recommendations to government later in the year. On behalf of our membership we remain available to assist the Commission in its work and can be contacted either by email or phone on the numbers listed below.

Sincerely,

Andrew Allan
National President
Stormwater Australia
