

24 March 2021

National Water Reform inquiry  
Productivity Commission  
Locked Bag 2  
Collins Street East  
Melbourne Vic 8003

Dear Commissioner

### **Submission in response to the National Water Reform 2020 Draft Report**

Urban Utilities welcomes the opportunity provided by the Productivity Commission to submit our feedback on the National Water Reform 2020 Draft Report released 11 February 2021. Urban Utilities previously provided a submission to the Commission in September 2020, available here: [https://www.pc.gov.au/\\_data/assets/pdf\\_file/0008/256481/sub085-water-reform-2020.pdf](https://www.pc.gov.au/_data/assets/pdf_file/0008/256481/sub085-water-reform-2020.pdf)

Urban Utilities supports the findings and recommendations made by the Commission in their draft report. Like many water service providers across Australia, Urban Utilities is at a critical juncture in our objective to reshape the water cycle to cater for a growing population, increasingly uncertain climate and the changing needs of our communities. A strong, comprehensive and evidence-based national policy on water, as envisaged in the draft report will be critical to meeting this objective.

Our organisation also welcomes the clarity of the statements made by the Commissioner to the media in the release of the draft report. We believe that this clarity will support greater public understanding and engagement on this topic in the years to come.

On reviewing the draft report, and in support of the next phase of the inquiry, we propose that the Commission consider the following recommendations in the development of their final report:

#### ***Recommendation 1: That a reformed NWI recognises that affordability is an inextricable aspect of liveability***

The Commission refers to heightened community expectations of water service providers for the delivery of liveability outcomes such as amenity, urban greening and urban cooling. We recommend that a reformed NWI pursue a balance between these liveability outcomes and affordability of water services.

We have recently engaged with our customers and communities on the theme of liveability and feedback from this engagement made it very clear that affordability of our services is the most important concern for our communities. They told us that they see cost of living as a critical element of liveability, and that affordability is a foundation for their trust in our organisation. This insight has been fundamental in shaping Urban Utilities' long-term direction to drive efficiencies into our water cycle to ensure that liveability outcomes can be met without significant escalation of costs.

***Recommendation 2: That reporting requirements under a reformed NWI are matched to the organisation accountable for performance.***

Urban Utilities welcomes the renewed attention on robust reporting requirements to support transparency and accountability. Our organisation supports the view that this is an important part in improving the public understanding of water and the trust our community have in the organisations involved in the management and stewardship of the water cycle.

As such, care must be taken not to aggregate and communicate reporting in a way that makes it difficult to identify the roles, accountabilities and performance of specific organisations involved.

Urban Utilities recommends that, where appropriate, organisations and agencies are accountable for their own performance and reporting obligations towards a national framework.

Urban Utilities would be happy to discuss these recommendations, or those made in our first submission, with the Commission further.

Yours sincerely

Chris Bulloch  
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Urban Utilities