

Submission to the Essential Services Commission Price Review For Greater Western Water

Essential Service Commission
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Melbourne Victoria 3000
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Wednesday 13th December 2023

Re: Greater Western Water price review 2024

The Werribee River Association (WRA) wishes to comment on the Greater Western Water Price Submission 2023 to the Essential Services Commission.

[Werribee River Association](#)

WRA benefits the Werribee River catchment and surrounds by advancing the natural environment.

Our purposes are:

- Protecting water quality in the Werribee River, other local waterways and wetlands flowing to the coastline and into Port Phillip Bay
- Promoting the re-establishment of natural habitat for wildlife in the Werribee River catchment
- Providing attractive natural places for people to access and enjoy
- Providing educational programs about environmentally sustainable practices, educating a growing and diverse population living in the west of Melbourne

We speak up for waterways, wildlife and habitat, carry out research, conduct practical activity and work with the community.

The history of the organisation is grounded in advocacy and volunteerism for the environment and human health. In recent years, the organisation has grown substantially, now with five part-time staff, 200+ volunteers, and is a leading community-led, vibrant environmental agency in the Werribee catchment and surrounds.

WRA submits its comments to the Essential Services Commission Price Review for Greater Western Water, which offers opportunities for the future of human health, agriculture, troubled species and waterways in the west of Melbourne.

John Forrester
Werribee Riverkeeper

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Wastewater Treatment

The guiding principles of the Statement of Obligations for Greater Western Water under the Water Industry Act 1994, state that the corporation must assist in transitioning Victoria to an environmentally sustainable economy, with regard to many aspects of its operation, including the enhancement of environmental outcomes in urban and rural landscapes, and must act consistently with an approved Sustainable Water Strategy.

The GWW Deliberative Community Panel acknowledged that GWW have limited responsibility to support waterway health, but agreed waterway health was a priority, so recommended spending money for improving quality of water discharged into waterways, increasing treatment plants capacity to minimise the risk of spills, collaboration with others and improving community education. p.15

The Central and Gippsland Region Sustainable Water Strategy Final Strategy 2022, p.235 states that:
“Protecting water quality helps to improve waterway health (reducing pollution and managing discharges into waterways) and minimising the impacts of recycled water on land and waterways.”

Greater Western Water’s own environment policy states that its purpose is to improve the health of the environment and community liveability, yet it releases recycled water into the Werribee River during high rainfall. The latest of these incidents took place in early December 2023, as reported by GWW staff after enquiries:

“Due to storages at the Melton Wastewater Treatment Plant reaching their safe operating level as a result continued rain causing a slowdown in irrigation. The release was done under current EPA license conditions when the Werribee River was at high flows due to heavy rain and in conjunction with a planned release from Southern Rural Water. This ensured the recycled water was diluted and well mixed with rainfall run-off.

There was a total of 64 ML of class B water released and a monitoring program was in place during the release to ensure compliance with license conditions and we worked closely with EPA, Melbourne Water and Southern Rural Water, samples were taken up stream, downstream and at release point.”

Concerns about using wastewater in the Werribee River catchment were raised first in the 1970s, in the report entitled *Light and Darkness by Werribee Jaycees* 1972, p.9, and again publicised in an article *They’ll turn our river into a Sewer* in the Werribee Shire Banner, Werribee Conservation League Sep 18 1974, p.1. Some years later WRA called for a review of releasing recycled water in *Disposal of Recycled Water Needs Review* Werribee Riverkeeper Newsletter Werribee River Association No.25 Oct 2015, p.1.

WRA notes that GWW had “...cases of non-compliance with EPA licence conditions,” Price Submission 2023 p.3, and with rapid urban growth in the catchment, there are more expanding wastewater plants which may impact the waterways.

Assuming some of these cases of non-compliance were to do with wastewater treatment plants, WRA has issues with current standards of recycled water being used in this way in waterways now denoted as living entities under *Waterways of the West* legislation 2021.

Recommendation 1: That GWW be supported in their plans to upgrade all of their treatment plants in their delivery area, to EPA requirements within five years.

WRA believes that Greater Western Water has made good progress on their Melton Plant since 2015 with works and maintenance, but that very little community engagement has taken place over the years with regard to news and details of such releases.

Access to environmental information is critical to environmental decision-making, and since environmental groups can be supportive partners to government and authorities by using information in advocacy, grant applications and more, then releasing such information is a positive outcome.

Recommendation 2: The GWW create a system to release news and data of such releases to the community in an easy to access, well-known way as soon as possible.

Standards of Recycled Water

WRA is aware that E. coli counts in water from the river, as measured by farmers at Werribee South, are sometimes of concern, and some farmers have been testing it more than required so as not to harm their reputation, or put their crops at commercial risk. Considering that the river water is diverted from the Werribee Diversion Weir to Werribee South, then we can safely assume that the Wyndham City CBD and suburbs south of the weir do not contribute to the E. coli count. The suburbs north of the weir certainly contribute stormwater to the river but up till the last few years the entire area was rural. So, it is likely that recycled water does add to the count of E. coli in the water used by farmers.

While Class A recycled water is classified by the Department of Human Services as safe for use in irrigation, WRA notes:

- a. The naming of recycled water as Class A is seen by many in the community as a misnomer, indicating a uniform high standard of recycled water when in fact Class A at one wastewater plant is not the same as Class A at another plant. This is easily illustrated by a comparison of the recycled water from Melbourne Water's Western Treatment Plant with its higher salinity levels and a mix of chemicals from industrial sources, and with Greater Western Water's Surbiton Plant at Melton South, which has a much likely lower level of salinity and a likely different mix of chemicals.
- b. The maintenance of labelling water as one class when it is so obviously different to that class elsewhere adds blockages on investment taking place at wastewater treatment plants so that water can be recycled to a better standard for our food production and environment, and even inhibits the potential use of recycled water as potable water in Australia due to concerns by community with pollution and their health.

- c. In addition, emerging contaminants were examined in the Victorian EPA's 2021 report from over 30 of Victoria's wastewater treatment plants (WWTP), [Emerging contaminants in recycled water](#)
"International research has shown that WWTP effluent discharged into adjoining rivers or used for irrigation have been shown to include contaminants of emerging concern," p.3

The report, EPA's first-of-its-kind in Victoria, has been criticised for just looking at the individual chemicals of concern, and not studying the effect of the chemicals mixing into a cocktail which is the reality in wastewater.

The EPA, as regulator of environmental quality, needs to have stronger and tighter discharge standards in line with USA EPA, WHO and UN databases that include pharmaceuticals and 'for life' chemicals such as PFAS which are known to be in recycled water.

The general environmental duty (GED) applies to discharges from wastewater treatment plants and water corporations must take steps 'so far as reasonably practicable' to reduce and minimise the harmful effects of pollution and waste.

The GED is at the centre of the Environment Protection Act 2017 and it applies to all Victorians. It requires all businesses to reduce the risk of harm from their activities:

- to human health and the environment
- from pollution or waste.

While it is pleasing to note that on page 70 of GWW's submission, that Melton Recycled Water Treatment Plant will receive some growth upgrades and maintenance improvements, that may not stop the use of the river as a drain for Class B recycled water.

Recommendation 3: That the ESC reinforce the principle that externalities such as pollution from treatment plants should be taken into account in setting prices.

Platypus

WRA published a twenty-five-year story in 2023, of platypus research in the Werribee River from 1998 to the present in *Putting Perridak Back on Track* in August 2023.

The full report is available [here](#)

The report summarised observations and findings from research into platypus in the Werribee River, noting the threats which have led to the decline of platypus in the waterway. The report was put together by WRA from research and observations carried out by scientists working for Melbourne Water and others. WRA acknowledges the assistance over those years from Melbourne Water, Western Water, Wyndham City and more.

It is well established that a moderate population of platypus exist downstream of the Werribee Diversion Weir and a moderate to good population upstream of the Melton wastewater treatment

plant to beyond the Bacchus Marsh area, but data shows limited existence of platypus in the reach of river between the treatment plant and the Werribee Diversion Weir.

In the EPA's *Victorian Guideline for Water Recycling March 2010*, classes of recycled water (A, B and C) include health-related microbiological and process performance requirements but not environmental quality parameters such as salinity or nutrient limits.p.10.

Given that the Werribee River has a high level of nutrients from urban and rural sources anyway, the increase in the level of nutrients from releases of recycled water into the river will add to the overall threat of nutrients, and since invertebrates are affected by increased levels of nutrients, the recycled water flows may have contributed to lowering the level of invertebrates further in that reach of the river, evidenced by the poor results from eDNA and live trapping surveys for platypus in the area.

This affect is likely to be happening downstream of the Werribee Diversion Weir also, with low flows there, only receiving a passing flow and stormwater, plus less than recommended environmental flows. That will be, as explained further by Sheridan in the *Werribee River Catchment Nutrient Management Plan* PPWCMA c2000;

"...creating long retention times in pools and allowing the release of nutrients from sediments." p.28

As urban expansion continues with growing communities settling in the Werribee River catchment, there is an increasing demand on waterway health and protection.

Melbourne Water's Healthy Waterways Strategy 2018 says:

"If current policy and levels of investment are maintained, without improvement, then it is likely that the Werribee catchment region will experience declines in environmental and social values over the next 50 years. There is a real need to take action to avoid an otherwise inevitable decline in waterway health." p.03

Recommendation 4: That GWW be supported through funding to act collaboratively with other water corporations, public authorities and government agencies to plan for and lift waterway health.
