



Concerned Waterways Alliance submission to Greater Western Water Price Review 2024.

The Concerned Waterways Alliance (CWA) is a network of community and environment groups from Gippsland to the Otways. We share a deep concern about the degraded state of southern Victoria's rivers, wetlands and aquifers, and are committed to improving their health for the benefit of current and future generations.

We are writing in support of submissions made by our member groups, Friends of Steele Creek and Werribee River Association.

We are particularly concerned about the state of GWW's wastewater treatment plants. Their Draft Pricing Submission reveals that the new organisation has inherited non-compliant wastewater treatment plants at Woodend, Gisborne, Riddells Creek, Romsey, Sunbury, Bacchus Marsh and Melton.

It is accepted that there is considerable cost involved in upgrading these seven treatment plants, all of which are located in areas experiencing unprecedented population growth. However, it is also clear that this growth had not been adequately planned for by Western Water, despite government policy anticipating significant population increases for many years.

The impact on our precious waterways has been immense. These outdated wastewater plants are located in upper catchments which are home to the best environmental values of the region. The upper Maribyrnong catchments supports nine native fish, including the endangered Yarra pygmy perch and Australian Grayling, in addition to Growling grass frog and small populations of Platypus. Platypus feed on a variety of macroinvertebrates which are susceptible to pollution. Research into the platypus population in the Werribee River show a lack of animals between Melton and Werribee, attributable to highly variable flows for Melton Reservoir for irrigation, and possibly due to the cumulative impact of releases of recycled waste water containing high levels of nutrients from Surbiton Park since c1974, having negative effects on invertebrate numbers in-stream. The recent ammonia spill at Sunbury would have caused invertebrate species to die from lack of oxygen.

Pollution also undermines the economic value of our waterways. A long-term producer on Deep Creek recently relocated to the Yarra catchment where *"reliable good water quality is available."* Biodynamic producers refuse to take water from Deep Creek because it risks the status of their clean, green produce. High nutrient levels have caused blue green algal blooms in the Werribee catchment and some producers refuse to take the recycled water because it is too saline, preferring

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to use river water instead. Farmers who do take recycled water are concerned they are spraying poor quality water on the vegetables. Pollution also reduces community amenity.

Our waterways are experiencing regular pollution events, as a result of spills and the poor quality of treated effluent, which inevitably lead to simplification of species i.e., macroinvertebrate and fish population sizes decline and fewer species are present. That's an unacceptable outcome for communities.

All pollution events are:

- A breach of the General Environmental Duty in the Environment Protection Act and
- Contrary to the Waterways of the West Action Plan which is striving to reduce pollution in the Maribyrnong and Werribee catchments.

These serious pollution occurrences also contravene the Water Act's mandated Statement of Obligations requiring all water corporations to protect waterways.

While we appreciate GWW's commitment to keep prices down, under-investment in wastewater treatment is a false economy, particularly in view of population growth in a drying climate. The Central and Gippsland Region Sustainable Water Strategy envisages the substitution of manufactured water, including recycled water, for river water in coming years. But recycled water must be of suitable quality to enable the transition and investment is required now, not in 10 years' time as envisaged in the pricing submission.

The current situation contravenes the Guiding Principles in the 'Statement of Obligations' for water corporations require that the corporation must 'assist in the task of transitioning Victoria to an environmentally sustainable economy' and 'manage water resources in a sustainable manner that enhances environmental outcomes.'¹ It also undermines GWW's commitment to heal and care for Country.

We submit that all GWW's wastewater treatment plants should be brought up to EPA standards within 5 years. Additional funding from government may be required to assist in this process.

For further information, please contact Juliet Le Feuvre

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¹ [MBR028466R.pdf \(water.vic.gov.au\)](#) s1-6