WSAA submission to the Productivity Commission (Australian Government) call for submissions: Opportunities in the circular economy

The Water Services Association of Australia (WSAA) thanks the Productivity Commission (the PC) for its role as the Australian Government's independent and advisory body on policy affecting the welfare of Australians. In particular, for its inquiry into Australia's opportunities in the circular economy to benefit the economy and environment. WSAA welcomes the opportunity to provide this submission.

WSAA is the peak body representing the water sector in Australia and New Zealand. Our members provide water and wastewater services to over 24 million customers in Australia and New Zealand and many of Australia's largest industrial and commercial enterprises.

WSAA has done a lot of work in the circular economy space and released the following recent publications:

- <u>'Transitioning the water industry with the circular economy'</u>, Water Services Association of Australia and UTS Institute for Sustainable Futures, October, 2020
- <u>'Towards resilience: Climate change and the urban water industry in Australia and New Zealand'</u>, Water Services Association of Australia, November, 2021
- Water, fuelling the path to a hydrogen future, Water Services Association of Australia, November 2021
- <u>'Circular Economy Action Plan: A companion volume to Transitioning the water industry with the circular economy'</u>, Water Services Association of Australia, March, 2022
- How a nutrient trading regime can deliver environmental outcomes, Water Services
 Association of Australia, March, 2023
- <u>'Help Us Help You Australian water sector opportunities and barriers to circular economy'</u>, Water Services Association of Australia, January, 2024
- <u>'Circular Economy Framing Document'</u>, Water Services Association of Australia, August, 2024
- 'Nature Positive Water', Water Services Association of Australia, August, 2024

In October 2022, Australia's Environment Ministers committed to accelerate the transition to a circular economy by 2030. WSAA has engaged with the Circular Economy Ministerial Advisory Group (CEMAG) since its establishment in early 2023. While water was not initially among the priority areas, WSAA submitted the report, 'Help Us Help You,' proposing that water should be a priority as it is intrinsic to all other economic activity and productivity outputs, and offers many opportunities to support national circularity and decarbonisation efforts.

In August 2024, the CEMAG invited WSAA to Parliament House to present to the CEMAG in person, with Minister Plibersek. WSAA outlined the potential benefits of biochar, fit-for-purpose water reuse for all end uses, and preventing pollution and sewer impacts through compliant flushable wet wipes. We provided water sector input during a 75-minute discussion. This covered:

- the various levers available to the Commonwealth government
- the interaction with the renewed National Water Agreement being developed

- potential avenues for funding
- international examples
- the need for coordination with national science and research activities.

WSAA members, Icon Water, Barwon Water and Sydney Water provided additional case studies for inclusion in this submission. Icon Water submitted a summary of its award winning program, 'No Opportunity Wasted' (2020). The summary document includes eight circular economy case studies.

Barwon Water referred its case study on the <u>Colac Renewable Organic's Network</u>, which is also referenced in the '*Towards Resilience*' 2021 paper.

Sydney Water shared its report <u>Unlocking the circular economy in the Western Parkland City</u>.

It is suggested to read the WSAA publications in their entirety for better flow. However, the table overleaf indicates publications and sections corresponding to the Commission's Request for Information.

WSAA values this inquiry into circular economy opportunities and feels there is a sense of urgency as many water assets are high-cost, long-life investments and there is a significant investment opportunity in the near term with the expected replacement of assets that were installed during the post-war boom.

As the last remaining essential service that is primarily publicly owned, a focus on urban water circular economy opportunities is a strong national investment. Any constructive government interventions to our operations will deliver benefits that go to communities and accelerate public amenity.

WSAA is open to meeting with the PC to assist with the development of this report, and facilitate data provision. WSAA understands that other water utilities will provide their own submissions and supports their participation to this inquiry.

Contact

WSAA welcomes the opportunity to discuss this submission further.

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Request for information

Through this inquiry, the PC is seeking information on the scope items included in the table below. For ease of reference, we have provided direction to relevant sections of our publications and case studies that address the questions in the call for submissions.

Additionally:

 a case study summary table by system component and based on the five areas of opportunity in the circular economy is available in the 'Circular Economy Framing Document,' from page 18.

Information request 1 – Circular economy success stories and measures of success (Australian case studies of circular economy activities already occurring)

Criteria	Publication	Location
Narrowing loops (e.g. reducing the demand for materials)	WSAA Transitioning the water industry with the circular economy	Pp 2 – 11
	Sydney Water – Conserving water through advances in leak prevention Mackay Regional Council – Conserving water through digital transformation	Case studies 24, 27 in Appendix 1
	An excellent way to narrow loops is adopting purified recycled water for drinking, and to a lesser extent desalination. Information about these options is available in WSAA's All Options on the Table – Urban Water Supply Options report.	There is also information on Perth's use of purified recycled water and desalination in Case Study 25 in Appendix 1, Perth's transition to rainfall independent water supply, Case Study 52 (Sydney Water PRW Discovery
	There is an opportunity to explore narrowing loops for the future growth of data centres. Many require for water for cooling purposes. This directly challenges water circularity solutions. More creative solutions leveraging other local water users is required beyond the linear approach.	How can we cut water consumption in data centres? - Arup
Closing loops (e.g. using materials multiple times)	Various waste to energy projects in the case studies in Appendix A.	Australia/NZ: 4 5 9 18 19 20 21 22 25 33 35 36 37 39 41 42 45 49 International: 1 2 3 8 9

	Circular Economy Framing document	All
Slowing loops (e.g. extending useful product life)	Circular Economy Framing document	SE Water case study - p.42
Regenerating (e.g. using non-toxic materials and regenerating ecosystems)	WSAA Nature Positive Water Water is a central enabler to regenerating ecosystems	Case studies (this reflects the numbers in the Nature Positive report, not in Appendix A) – 3, 6, 7, 8, 9, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23 & 24 International case studies (Appendix A): 6 7 10 12 16
Australia's overall potential to move to a more circular economy, as well as how best to monitor progress and measure success	WSAA Circular Economy Action Plan WSAA Help Us Help You Circular Economy Framing Document	All All

Information request 2 – Priority opportunities to progress the circular economy

Criteria	Publication	Location
Improve environmental and economic outcomes through greater adoption of circular economy activities		
Affect on business and economic outcomes (including costs), environmental outcomes (including biodiversity, climate and water, land and air quality), and social outcomes	Submission for ACCU method development for biochar – a key enabler for the water sector (and other sectors) to sequester carbon. Submission made by WSAA and ANZBIG, unfortunately not prioritised for method development over the next year.	Link to method expression of interest Biochar-Method-Expression-of-Interest-12July2024-1.pdf
	WSAA Circular Economy Framing Document provides overview of different business and environmental outcomes and includes an overview of current and emerging technologies for resource recovery from wastewater treatment.	CE Framing Document – particularly emerging and new technologies for resource recovery summarised pp 63 – 64, along with opportunities for each case studies presented in Appendix 1 from pp 22-63.
	Sydney Water: <u>Unlocking</u> the circular economy in the	

	Western Parkland City NSW Circular engaged ISF to develop a high-level economic and environmental analysis of the the opportunity to accept and process organic waste (such as food waste or fats, oil and greases) at the Upper South Creek Advanced Water Recycling Centre (AWRE).	ISF Unlocking the value of food waste in Western Sydney full report.pdf
Feasible levels of future uptake or adoption in Australia	WSAA Help Us Help You	The technical papers pp 15 – 68 seek to convey scale for each of the 4 opportunities (with varying degrees of quantification)
How their effects could best be monitored or measured, and how opportunities could be prioritised	WSAA Circular Economy Action Plan	CE Action Plan (All), has prioritised measurement as Strategic direction No. 3 – pp 18, noting future opportunity to capture in WSAA benchmarking
	WSAA Circular Economy Framing Document	CE Framing Document – highlights opportunities particularly emerging and new technologies for resource recovery summarised pp 63 – 64, along with opportunities for each case studies presented in Appendix 1 from pp 22-63
How Aboriginal and Torres Strait Islander knowledges could be valued, in ways that protect Indigenous cultural and intellectual property, to identify and develop these opportunities	WSAA Nature Positive Water Traditional Custodians have a central role in realising a circular economy and reaching Nature Positive goals.	Case studies 3, 4, 5 in Nature Positive Water.

Analysis of which circular opportunities provide the greatest scope to improve environmental and economic outcomes in Australia and why

There are an incredible number of CE opportunities in the water sector, everything from conditioning soils, sequestering carbon, recovering cellulose, providing green hydrogen, provision of fertilisers for agricultural sector and materials for low-carbon concrete. These are summarised in the **WSAA Circular Economy Framing Document**, summarised in diagram below – pp 64 and pp 63 respectively.

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Modelling or analysis relating to the potential benefits and costs of implementing specific circular economy opportunities at the sector, product or supply chain segment level (including, but not limited to, life cycle assessments or cost-benefit assessments)	WSAA Circular Economy Framing Document,	Biochar technical paper (pp 16 – 27) includes some scope estimates, including figures from the ANZ Biochar Industry Group 2030 Roadmap Diagrams above – pp 64 and pp 63 respectively, with all case studies in Appendix 1 recommended to review.
The distribution of benefits and costs, and whether they will occur in the short, medium or long term	-	-
Information on specific opportunities and risks for Australia resulting from international developments, including circular economy policy.		
Developments that affect Australian exports, such as by opening or creating new markets, or by placing regulatory requirements on the design and production processes of Australian exports	Opportunities to develop markets from municipal wastewater treatment facilities reduces risks from exported products – like phosphorous fertilisers for agricultural sector, not to mention the benefit from keeping these resources in use / out of the environment.	
Developments that affect Australian imports, such as changes to production methods internationally, or developments in international markets	-	-

Information request 3 – Hurdles and barriers to a circular economy (the main reasons businesses and consumers have not adopted circular economy practices to date)

Criteria	Publication	Location
Costs	Help Us Help You Constraints for investment outside of core business in the Australian water sector from economic regulation and pressure to keep prices flat for customers and community.	Biochar technical paper p 15

	Current lack of access to market investment (carbon, biodiversity, nutrient) from private companies/ businesses to support and scale investment in regenerating nature and realising the circular economy.	WSAA Nature Positive Water – Case Study No. 24 – TNC Water Fund Models (pp 66)
Attitudes (including about risk)	WSAA Help Us Help You Purified recycled water for drinking is an excellent, safe, sustainable and cost- effective option that has widely adopted in the US yet not in Australia. Government attitudes are often more problematic than community attitudes — despite community research indicating support, implicit government policy bans often remain.	Sections about purified recycled water for drinking (pp 44 – 68). Also see WSAA's submissions to the Productivity Commission and DCCEEW reviews of the National Water Initiative here here here and here.
Regulatory constraints	WSAA Help Us Help You Sydney Water: Unlocking the circular economy in the Western Parkland City	Technical papers pp 15 - 68
Lack of information or resources	There is generally not a shortage of information in the Australian water sector. But water businesses are challenged in pursuing initiatives outside their core business, however beneficial, because their regulatory framework constrains them to core business.	Help Us Help You
Lack of coordination	-	-

Information request 4 – Governments' role in the circular economy

Criteria	Publication	Location
The extent to which policy or regulatory changes (national, state and territory, or local; or for specific sectors, products or supply chains segment level) could better enable the pursuit of circular economy activities. This may include:		
Financial incentives	Markets for end use	

	products or services	
	Sydney Water: <u>Unlocking</u>	
	the circular economy in the	
	Western Parkland City	
Information provision	Purified recycled water and desalination Sydney Water: Unlocking the circular economy in the Western Parkland City	WSAA has continued to indicate to governments that studies show that giving information to communities about various water supply options increases support, this should be included more explicitly in the renewed National Water Agreement.
Regulatory changes (e.g. approval processes, standards and codes, mandatory reporting, competition and consumer regulation, chemicals regulation) and coregulatory approaches	WSAA Help Us Help You	All sections, in particular the technical papers on biochar, fit for purpose water reuse, reducing waste and pollution (wet wipes), and nutrient offsetting (pp 15 – 68)
	Interestingly many Circular Economy case studies are driven by requirements to reach Net Zero emissions; and other environment requirements – WSAA Circular Economy Framing Document.	Appendix 1 Case studies – all highlight a link to emissions reduction or environment outcomes from CE case studies - (pp 17 – 64)
	The WSAA Towards Resilience paper also highlights 'fostering an enabling regulatory environment' for climate change mitigation and adaptation as a key strategic priority area	Refer to pp 70
Education and training	Improving customer and community climate and water literacy is highlighted in the WSAA Towards Resilience Paper. Enhancing customer and community literacy will improve understanding and willingness to pay for circular economy opportunities as key enabler	Refer pp 74 - 81

	for Net Zero transition and reaching Nature Positive goals.	
Facilitating collaboration	Realising the circular economy requires effective partnerships and cross – sector collaboration. As the water sector improves its maturity and understanding of material Value chain emission sources (Scope 3 emissions sources), this will be another lever to support and facilitate collaboration across traditional operating boundaries.	WSAA Scope 3 Emission Guide
Planning, and urban and regional development	Supporting circular economy initiatives, enable the Net Zero transition and support resilient water and wastewater service delivery for urban and regional development – WSAA Towards Resilience	Identified throughout publication through climate themes in case studies, particularly clear 'Circular economy and resource recovery' section pp 37-42
	Wastewater treatment plants can offer significant opportunities for co-location of resource recovery hubs – examples in food waste co- location, trade waste anaerobic digestion, green hydrogen, renewable energy generation, recovery of grit for asphalt, cellulose, etc. Many of these opportunities are highlighted in case studies in the <u>Circular Economy</u> <u>Framing Document</u>	Case study - West Wodonga STP (pp 36 – 38) Biosolids to Fertiliser – Watercare (pp 57 – 60) Wianamatta Circular Economy Precinct Sydney Water (pp 46 – 49)
The extent to which current policies or regulations hinder the pursuit of circular economy activities. Specific examples of how current settings are acting as barriers would be welcome	Lack of methodology for carbon sequestration credit Australian Carbon Credit Unit (ACCU) from biochar – a limiting factor to help support a circular economy, ERF manages these which are proponent led with only 4 methods selected for prioritisation over the next year, with over 30 submissions received.	Link to method expression of interest Biochar-Method-Expression-of-Interest-12July2024-1.pdf

	It is widely recognised that broader methodologies are required to enable markets to support genuine emission reduction initiatives across a broader range of environments and projects. Recognition of the emission reduction from biochar provides an additional supporting tool to enable emerging markets for utilities to participate in.	
The benefits, costs, risks and implementation issues associated with current or potential policy or regulatory changes that aim to address barriers to circular economy activities	Help Us Help You	Technical papers pp 15 – 68 discuss these headings for each of the 4 opportunities
What actions governments could take to facilitate Aboriginal and Torres Strait Islander roles in progressing the circular economy, including in drawing on Indigenous knowledges in policy design in ways that recognise and protect Indigenous cultural and intellectual property	WSAA's <u>Closing the Water</u> <u>for People and</u> <u>Communities Gap</u> report	Recommendations 1 and 5 p45, 46

Appendix A – Case study library

	Case study	Organisation / location	Link
1.	Beyond Energy Neutral	Ejby Mølle WWTP (Denmark)	'Transitioning the water industry with the circular economy'
2.	Co-Digestion with Fats, Oils and Greases	Gresham WWTP (USA)	'Transitioning the water industry with the circular economy'
3.	Development of Biorefinery	Billund WWTP (Denmark)	'Transitioning the water industry with the circular economy'
4.	Microalgae Wastewater Treatment	Engineering In Life Sciences	'Transitioning the water industry with the circular economy'
5.	Hydrogen from Biogas	Hazer, Woodman Point WWTP (Western Australia)	'Transitioning the water industry with the circular economy'
6.	Daylighting Stormwater Creeks	Seattle (USA)	'Transitioning the water industry with the circular economy'
7.	Moving WWTP Underground	Pantai 2 WWTP (Kuala Lumpur, Malaysia) Sunken WWTP (Nanxiang Town, China) Henriksdal WWTP (Stockholm, Sweden)	'Transitioning the water industry with the circular economy'
8.	Biomakery	La Trappe Brewery (Netherlands)	'Transitioning the water industry with the circular economy'
9.	Hydrogen Biofuel Cell	NA	'Transitioning the water industry with the circular economy'
10	. Designing Circular Cities	(Kunshan Jiangsu, China)	'Transitioning the water industry with the circular economy'
		Greening Building Walls and Roofs	'Transitioning the water industry with the circular economy'
11	. Commitment to Public Interest	Anglian Water (UK)	'Transitioning the water industry with the circular economy'

Case study	Organisation / location	Link
12. Collaborative Watershed Solutions	NewWater (Green Bay, USA)	'Transitioning the water industry with the circular economy'
13. Social Network Analysis	Melbourne Water (Victoria)	'Transitioning the water industry with the circular economy'
14. Circular Economy Vision & Principles	Sydney Water (New South Wales)	'Transitioning the water industry with the circular economy'
15. Four Capitals Approach	Yarra Valley Water (Vicotria)	'Transitioning the water industry with the circular economy'
16. Circular Regenerative Economies	(Slovenia)	'Transitioning the water industry with the circular economy'
17. Impact Of Cyclones on Customer and Service Standards	Cairns Regional Council (Queensland)	Towards Resilience case study
18. Zero Emissions Water	Coliban Water, East Gippsland Water, Lower Murray Water, South East Water, South Gippsland Water, Southern Rural Water, Wannon Water, Westernport Water, Yarra Valley Water	Towards Resilience case study
19. Carbon Neutral Logan	Logan City Council (Queensland)	Towards Resilience case study
20. 1MW Floating Solar Array, Rosedale Wastewater Treatment Plant	Watercare (New Zealand)	Towards Resilience case study
21. Renewable Organics Network	Barwon Water (Victoria)	Towards Resilience case study
22. Hydrogen Opportunities for Water Utilities	Yarra Valley Water (Victoria) Water Corporation (Western Australia)	Towards Resilience case study
23. Water Sector Climate Adaptation Planning	Icon Water (Australian Capital Territory) North East Water (Victoria)	Towards Resilience case study

Case study	Organisation / location	Link
	Hunter Water (New South Wales)	
24. Conserving Water Through Advances in Leak Prevention	Sydney Water (New South Wales)	Towards Resilience case study
25. Perth's Transition to Rainfall-Independent Supply	Water Corporation (Western Australia)	Towards Resilience case study
26. Whole-Of-Business Climate Change Preparedness	South East Water (Victoria)	Towards Resilience case study
27. Conserving Water Through Digital Transformation	Mackay Regional Council (Queensland)	Towards Resilience case study
28. Determining Customer Support to Mitigate Greenhouse Gas Emissions and Climate Change Impacts	Yarra Valley Water (Victoria)	Towards Resilience case study
29. Customer Perceptions of Climate Change and Willingness to Pay for Climate Change Programs	Hunter Water (New South Wales)	Towards Resilience case study
30. Greening The West	Greater Western Water (Victoria)	Towards Resilience case study
31. Application of a Shadow Carbon Price in Capital Decision Making	Coliban Water (Victoria)	Towards Resilience case study
32. NSW Sustainability Bonds	Sydney Water (New South Wales)	Towards Resilience case study
33. Woodman Point Wastewater Treatment Plant	Water Corporation (Western Australia)	Water, fuelling the path to a hydrogen future
34. Malabar Wastewater Treatment Plant	Sydney Water (New South Wales)	Water, fuelling the path to a hydrogen future
35. Loganholme Wastewater Treatment Plant	Logan City Council Queensland (Queensland)	Water, fuelling the path to a hydrogen future
36. Wollert Waste to Energy Facility Co-Located at The Aurora Sewage	Yarra Valley Water (Victoria)	Water, fuelling the path to a hydrogen future

Case study	Organisation / location	Link
Treatment Plant		
37. West Wodonga Wastewater Treatment Plant	North East Water (Victoria)	Water, fuelling the path to a hydrogen future
38. Nutrient Offsetting Projects in Australia	Logan Water (Utility) Port Of Brisbane (Port Operator) Urban Utilities (Utility) Unity Water (Utility) Goulburn Valley Water (Utility) Melbourne Water (Utility) Sydney Water (Utility) Hunter Water (Utility) Townsville City Council (Utility) Coliban Water (Utility) Reef Credit Scheme (Water Quality Trading Scheme)	How a nutrient trading regime can deliver environmental outcomes
39. Reuse Of Decommissioned and Surplus Stock	Barwon Water and Barwon Asset Solutions (Victoria)	'Circular Economy Framing Document'
40. Circular Economy Program	Greater Western Water (Victoria)	'Circular Economy Framing Document'
41. Centralised Biosolids Facility	Hunter Water (New South Wales)	'Circular Economy Framing Document'
42. Spoil Reuse	Icon Water (Australian Capital Territory)	'Circular Economy Framing Document'
43. Low Carbon Roads	Lake Macquarie Council (New South Wales)	'Circular Economy Framing Document'
44. CE Portfolio for The West Wodonga STP	North East Water (Victoria)	'Circular Economy Framing Document'
45. Recycled Glass Sand for Pipe Embedment	SA Water (South Australia)	'Circular Economy Framing Document'
46. Wianamatta Circular Economy Precinct	Sydney Water (New South Wales)	'Circular Economy Framing Document'
47. Sustainable Water Schemes	Urban Utilities (Queensland)	<u>'Circular Economy Framing Document'</u>

Case study	Organisation / location	Link
48. Circular Economy in Construction - Reducing the Carbon Footprint	Yarra Valley Water (Victoria)	'Circular Economy Framing Document'
49. Biosolids To Fertiliser	Watercare (New Zealand)	<u>'Circular Economy Framing Document'</u>
50. Circular Economy Roadmap for Desalination	Water Corporation (Western Australia)	<u>'Circular Economy Framing Document'</u>
51. Understanding Nature Impacts and Dependencies	Yarra Valley Water (Victoria)	'Nature Positive Water'
52. Purified Recycled Water Discovery Centre	Sydney Water (New South Wales)	'Nature Positive Water'
53. Removal Of Disused Water Infrastructure and Reconnecting Headwaters of Yarram Creek	Barwon Water (Victoria)	'Nature Positive Water'
54. Healing County with Water Returns to Traditional Owners	Victorian Government	'Nature Positive Water'
55. That's My Water! Bush Schools	Power and Water Corporation (Northern Territory)	'Nature Positive Water'
56. Achieving Net Zero Nutrients	UnityWater (Queensland)	'Nature Positive Water'
57. Enhancing Drainage Systems and Mitigating Pollution - Drainage Freshwater Mussel Research and Demonstration	Water Corporation (Western Australia)	'Nature Positive Water'
58. Westernport Water Floating Wetland Pilot Project	Westernport Water (Victoria)	'Nature Positive Water'
59. Floating Wetland Trial to Extend the Life of Built Wastewater Assets	TasWater (Tasmania)	'Nature Positive Water'
60. Nitrous Oxide Trials and Scenario Testing	Watercare, Aotearoa (New Zealand)	'Nature Positive Water'
61. Global Collaboration Towards Net Zero	Melbourne Water, (Victoria) with Severn Trent (UK) And	'Nature Positive Water'

Case study	Organisation / location	Link
Emissions	Aarhus Vand (Denmark)	
62. Demand For Carbon Offsets with Benefits for Biodiversity	Victorian Water Corporations	'Nature Positive Water'
63. Regenerating Waterways and Reconnecting Local Water Cycles	WaterNSW (New South Wales)	'Nature Positive Water'
64. Protecting Catchment Health and Restoring Threatened Habitat	SA Water (South Australia)	'Nature Positive Water'
65. Bush Regeneration at Fosters Spur	Rous County Council (New South Wales)	'Nature Positive Water'
66. Restoring Land and Enhancing Biodiversity	Icon Water (Australian Capital Territory)	'Nature Positive Water'
67. Restoring Flows for The Platypus in Monbulk Creek	Melbourne Water (Victoria) and South East Water (Victoria)	'Nature Positive Water'
68. Drought Proof Koala Habitat	Urban Utilities (Queensland)	'Nature Positive Water'
69. Restoring Habitat for Critically Endangered Species and Cultural Values	Yarra Valley Water (Victoria)	'Nature Positive Water'
70. Reef Guardian Councils	Cairns Regional Council (Queensland)	'Nature Positive Water'
71. Thrive 2035 Net Clearing Objective	Water Corporation (Western Australia)	'Nature Positive Water'
72. Circular Economy Roadmap and Toolkit	Wannon Water (Victoria)	'Nature Positive Water'
73. Greening Using Sustainability Bonds	New South Wales Government	'Nature Positive Water'
74. Establishing Water Funds as Collective Action Structures to Investment for Impact	The Nature Conservancy	'Nature Positive Water'