

Submission to Infrastructure Victoria – Draft 30-Year Infrastructure Strategy

Infrastructure Victoria

Prepared by Friends of Latrobe Water Inc.

Submitted online via Engage Victoria



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Friends of Latrobe Water (FLoW) is a community advocacy group based in Gippsland, Victoria. FLoW works to facilitate a positive post-coal mining legacy for future social and economic prosperity of the region in a manner that safeguards and protects the community and surrounding environment, including the Latrobe River that contribute freshwater flows to the Ramsar listed Gippsland Lakes.

As part of its work, **FLoW** regularly contributes to discussion with regulators, policy directors and responsible agencies related to cause and effect of poor water quality and inadequacy of relevant regulatory frameworks to protect waterway health.

Overall, the draft is promising but **FLoW's** concerns are funding sources that we look for more clarification. We also see some recommendations with a focus on appealing to the public while overlooking the real issues to river health and water quality.

Our biggest concern is the lack of investment needed for aging wastewater treatment plants. This is essential for human and environmental health but not a showstopper that politicians may want to showcase the current inappropriate treated wastewater discharges into our rivers and upstream of drinking water offtake.

The draft has a good focus around climate independent sources of water under several headings meaning more water for rivers.

- *Climate change is an ongoing threat to Victoria's ecosystems:*
- *Infrastructure can contribute to a healthier environment:*
- *Victoria will need more manufactured water:*
- *Traditional Owners and the environment also need more water*
- *Recycled drinking water is a further opportunity*

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Flow supports the need to increase sources of manufactured water to ease pressures on our overallocated and flow stressed rivers, however, it is disappointing this draft did not have the water grid plan to inform the draft with its release held up by the water minister for unknown reasons.

Wonthaggi Desalination Plant

As noted in our recent meeting with Concerned Waterways Alliance, too many people believe the desalination plant is a white elephant and not ever been used for Melbourne's drinking water. For the draft to propose a 50% increase in the plant's capacity may have push back from the uninformed community. I have personally spoken with Melbourne Water that using words like 'the plant has gone into preservation mode' while not advertising the fact prior to the recent floods the Wonthaggi Desal plant had an essential role in providing Melbourne's drinking water for 3 years.

The community are not water literate and ignorant to population growth and its impact on potable water supplies. There is clear evidence that Geelong cannot continue to rely of water from Melbourne catchments for drinking water therefore significant responsible planning needs to occur now in the face of rapidly increasing population pressures.

Water saving initiatives cannot be sustained as a long-term solution.

Water treatment plant upgrades

How do we best work together to develop a clear plan for a secure and sustainable supply of water now, and for generations to come?

We need responsible preparation for who bears the responsibility of major infrastructure costs to upgrade treatment plants. Should water corporations bear the whole cost or should it be shared between multiple stakeholders including state and federal governments?

It is false economics that input credits from consumptive use is what funds large-scale investments.

There appears a greater dependence on the water grid to incrementally transfer water to outer zone areas without examining the added pressure on the already stressed regions the water is taken from.

Manufacture and recycled water

The regulated Latrobe River in Gippsland is the subject of much demand and competition to support full pit lake for coal mine rehabilitation, irrigation, recreation and tourism, environmental flow, cultural and nuclear.

The whole system is over-allocated including huge stresses on groundwater. Yet, DEECA have commissioned a risk report by Alluvium, Type of conditions that could apply to water access for Latrobe Valley mine rehabilitation and associated risks and benefits, that failed to identify the loss of the Morwell River inflows into the Latrobe River via the eventual collapse and pit merge of the Morwell River Diversion with the Yallourn pit. Morwell River currently supplies approximately 25% of surface water inflows to Latrobe River.

This DEECA team, Latrobe Valley Regional Rehabilitation Strategy (LVRRS), have failed to be transparent and accountable to the whole Victorian public about miners right to use current surface water entitlements at no cost per megalitre.

Flow had to FOI alternate water supplies and costings. Recycled water is all technically feasible but when miners get river and ground water for free other than infrastructure costs, there is something seriously wrong with the system to avoid scrutiny in developing a business case.

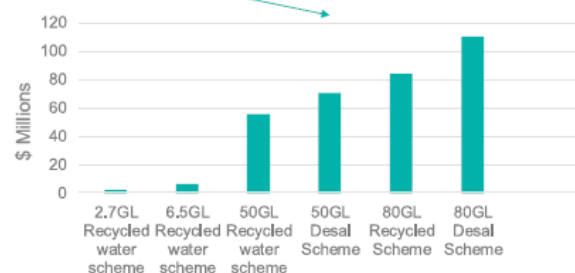
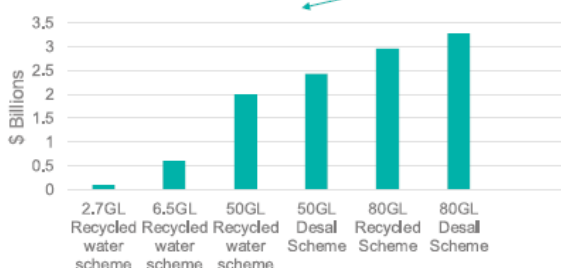
Water fill from river water without cost per ML is not sustainable given all factors considered over a 30year extraction period from the Latrobe River. The river is already in terminal decline impacting downstream beneficial assets like Ramsar sites and the Gippsland Lakes. The potential cost factors over this time for social, economic and environmental impacts from a losing river are enormous.

Implementation Action 4

What have we done?
Assessed the technical feasibility of alternative water sources:

What have we found?
All options are expensive, have approvals challenges and involve long-lead-times

What will we do next?
- Assess the possible economic values and benefits
- Investigate whether there are any water quality limitations



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Draft technical findings

- Under a drying climate, the indicative conditions (draft on previous slide) **would share reductions in flow** more evenly between mine rehabilitation and the environment with availability for mine rehabilitation mirroring declines in streamflow.
- The indicative conditions mean the **risk** to the environmental and Traditional Owner values would **not increase but remain high, particularly for Ramsar-listed Lower Latrobe wetlands**.
- Decisions for these water entitlements will be made upon application for water, no more than 5-years prior to cessation of mining and will not pre-empt the government's decisions about rehabilitation plans.
- A drying and variable climate means there is a **high degree of uncertainty** that a rehabilitated landforms can be achieved if relying on water from the Latrobe River system.
- The draft indicative conditions **do not allow for growth in access to water for other values and uses** in the Latrobe River system nor mitigation for adverse impacts (e.g. reduced flows due to interception activities or climate change).

Latrobe Valley Regional Rehabilitation Strategy Draft Key Findings

Feasibility of climate resilient (alternative water) for mine rehabilitation

- All options have varying lead-times, levels of complexity and challenging approvals processes but are **ultimately, technically deliverable**, subject to detailed design, business cases and other decision-making processes.
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- Though the quality of water able to be produced by these sources is high, site-specific characteristics will **invariably affect the quality of water over time making it difficult to achieve some Beneficial Uses (such as aquatic ecosystems) without additional interventions at the site-level**.
- Recycled options are expected to be generally lower in cost and less complex than desalination options as the option builds on existing assets and treatment infrastructure.**

Cost estimates for manufactured water

Manufactured water option	Estimated Levelised Cost \$/ML (+/- 40%)
50GL Recycled water scheme (ETP)	2,971
50GL Desal scheme	3,662
80GL Recycled scheme (ETP)	2,772
80GL Desal scheme	3,284

Current cost for surface water ...
\$11.55/ML and total annual cost of around \$700,000

The river system cannot sustain this amount of extraction over 30 years. Flexibility needs to be included in the current rehabilitation water licencing process sitting with the water department while *Infrastructure Victoria* plans for a better way to use up wasted recycled water to protect our flow stressed rivers without miners holding the state to ransom.

Water pricing

Water corporations are conflicted needing to expand consumptive use for funding new investments at the same time trying to keep water bills in check for customers all the while further reducing community aesthetics and wellbeing through harvesting of more water.

These all have significant cost burdens to fund and modernise infrastructure improvements to improve water quality but is not reflected in price submissions.

Should water corporations bear the whole cost or should it be shared between multiple stakeholders including state and federal governments? It is false economics that input credits from consumptive use is what funds large-scale investments.

A thriving natural environment benefits Victorians

The trees along its banks remove emissions from the air.

Yes, emissions are important, but health also needs to take note of the riparian zone for the health of the river to support the growth of the trees to provide habitat protection and prevention of erosion.

Each function has a role to play collectively and cannot succeed in isolation to a full holistic approach to river health.