WATER SERVICES
ASSOCIATION OF AUSTRALIA

INFRASTRUCTURE VICTORIA DRAFT 30 YEAR INFRASTRUCTURE STRATEGY 2025-2055: WSAA SUBMISSION

WSAA submission to Infrastructure Victoria Draft 30 Year Plan/Strategy (April 2025)

WSAA Submission to Infrastructure Victoria Draft 30-Year Infrastructure Strategy (2025–2055) - April 2025

The Water Services Association of Australia (WSAA) welcomes the opportunity to provide feedback on Infrastructure Victoria's Draft 30-Year Infrastructure Strategy. WSAA is the peak body representing the urban water industry, with members servicing over 24 million customers in Australia and New Zealand, including key Victorian utilities across both metropolitan and regional areas.

Overall feedback

We support the forward-looking approach adopted in the draft Strategy and believe it generally sets out a sensible pathway for key infrastructure that can help meet the challenges of Victoria's future and enable its communities and industries to thrive. WSAA supports Infrastructure Victoria's recognition of the need for more resilient, climate-adaptive infrastructure. This submission outlines our support and some areas where the Strategy can go further.

Our feedback is focussed on water-related recommendations. Whilst water is explicitly mentioned in a couple of recommendations, but we would like to see a broader focus on water in the final Strategy, to recognise the fundamental role water plays in enabling all other outcomes. Water is the lifeblood of a thriving community, in both visible and invisible ways. A strong, future-ready water supply system is an essential foundation for economic and social productivity.

We particularly commend Infrastructure Victoria on **Recommendation 25, Advance integrated water management and use more recycled water**. Modern water planning seeks to make use of all parts of the water cycle, to maximise the reliability, cost-effectiveness and environmental benefits of the water supply system. Recent east coast droughts, floods and bushfires have shown that it is important to complement traditional sources of water (rivers and dams) with rainfall-independent sources of supply. Desalination has been a valuable first step. Integrated water management is likely to yield substantial benefits for agriculture, green urban spaces, good value water bills and nutrient management.

We particularly commend Infrastructure Victoria's acknowledgement of the potential benefits of purified recycled water for drinking in Victoria. This is an option now implemented or being explored in various parts of Australia because it is safe, well-proven, weather-independent and often cost effective compared to other options – for example in Sydney, adopting purified recycled water as part of an integrated water supply approach will cost $2 billion less than a more desalination-focussed approach, for the same outcomes.

Given this, Infrastructure Victoria's recommendation that the Victorian government provide funding for a pilot/demonstration plant and community education initiatives makes sense and is strongly supported. We strongly encourage the Victorian government to adopt these recommendations, and help the water sector keep water bills low while providing a safe and reliable water supply for its communities. We outline our support for this in more detail below, along with some other suggestions on water infrastructure and approaches that would make the overall Draft Strategy more comprehensive.

Recommendation 1 Build more social housing

WSAA supports this recommendation and suggests that it include mandatory requirements for water efficient fixtures and fittings, that encourage water savings and minimise costs for tenants and/or governments. Low flow showerheads, taps and other water saving devices around homes are an opportunity to hardwire efficient water use from the outset. There are programs for installing this in existing homes in Victoria, like the Community Housing Retrofit Program run by Barwon Water with the support of the Victorian Government and the Community Rebate Programs. We recommend this also be a requirement in any new social housing.

Legislation could provide an additional incentive: there is provision in NSW and QLD Residential Tenancy Acts to allow tenants to refuse to pay the water usage charge, unless water efficiency devices are installed at the property, or if there is leakage.

Building social housing is a good infrastructure solution, but there are other ways to support affordability. We note that the Victorian water sector already has a strong record of providing support for vulnerable customers regardless of their housing situation. This includes rebates and a range of financial assistance programs.

Recommendation 7 Rezone locations near existing infrastructure for more home choices

WSAA supports this concept as from a water perspective, it is often lower cost to provide connection to water and wastewater services in infill areas, than to greenfield areas. So long as capacity is available it is often faster to roll out as well. The recommended reforms to infrastructure contributions should reflect these differences in cost also.

Recommendation 15 Build safe cycling networks in Melbourne and regional cities

Water utilities manage substantial tracts of land and waterways in Melbourne and Victoria's regional cities. The land adjacent to urban waterways can be ideal for cycling, and other forms of recreation, and is often preferred by the community as being safer and more pleasant to use than busy roads.

The Victorian Government is uniquely positioned to support water utilities in restoring the riparian zones of urban waterways, which may have been significantly altered or degraded by past management practices, and to partner with utilities and other land managers to improve cycling infrastructure alongside urban waterways, with multiple benefits for community development, health and wellbeing.

More information is available in WSAA's report Blue x Green = Thriving: A progress report on water's role for thriving communities

Recommendation 22 Invest in secure homes for Aboriginal Victorians

Recommendation 23 Fund better health and wellbeing infrastructure for Aboriginal Victorians

The Draft Strategy does not make clear that essential services (i.e. connection to water and wastewater infrastructure) are components of secure and sustainable tenancies. We suggest that this be clarified (or made explicit, if they are not considered to be part of secure tenancies).

We also suggest that levels of service should be provided for these essential services. They should be set at such a level of service that meets basic requirements and promotes safe and healthy living.

Regarding recommendation 23, the Draft Strategy should provide means for Aboriginal Community Controlled Organisations to access training for the delivery of water and wastewater services, as a component pathway to self-determination. Models that promote local skills and training in Far North Queensland, could be a case study to review and adopt.

The Minor works model may wish to consider installation of water efficient fittings and fixtures.

Given the context of Victoria's Aboriginal population (the bulk being in towns not identified in other States & Territories as 'discrete'), Infrastructure Victoria may wish to consider how the intent of Closing The Gap might be applied to towns with high percentages of Aboriginal people and use the same comparative measures to establish baselines and cases for future investment.

Recommendation 24 Reduce greenhouse gas emissions from infrastructure

Although water utilities contribute less than 1% of Australia's greenhouse gas emissions, the water sector is strongly positioned to help mitigate the climate impact of our infrastructure and operations, and to adapt the delivery of our services in a changing climate.

The water sector is committed to reducing Scope 1 and 2 emissions and is increasingly focused on identifying and managing Scope 3 emissions that occur in the upstream and downstream supply chain.

We encourage the Victorian Government to support water utilities to invest in the technology and infrastructure they need to transition to a net zero future. This includes incentivising the use of low carbon concrete in construction, and supporting research, development and investment in facilities to capture and reuse biogas from wastewater treatment, and use of biosolids in the production of biochar and biofuels.

Please refer to WSAA's Guide to Scope 3 emissions management in the water sector

Recommendation 25 Advance integrated water management & use more recycled water

Integrated water management has many benefits

Across Australia, embedding integrated water management principles into broader infrastructure planning has been a challenge. Lack of clarity around objectives and obligations makes it difficult for water utilities to establish what they need to deliver, and to justify investments to regulators and their own executive.

Where integrated water management has been effectively implemented, there has been strong buy in and leadership from government leading planning decisions, which is critical to the successful delivery of blue and green infrastructure.

WSAA highlights Victoria's integrated water management forums as a model of effective collaboration that is achieving tangible outcomes. For example, the Greening the West initiative in Melbourne which has so far planted over one million trees in parks, waterway corridors and peri-urban areas, and Greening the Pipeline, a proposed 27km green corridor connecting Werribee to central Melbourne.

We encourage the Victorian Government to embed integrated water management as a fundamental component of all infrastructure planning across the state, and to support water utilities to strengthen their capacity to partner and collaborate with other sectors to deliver green and blue infrastructure.

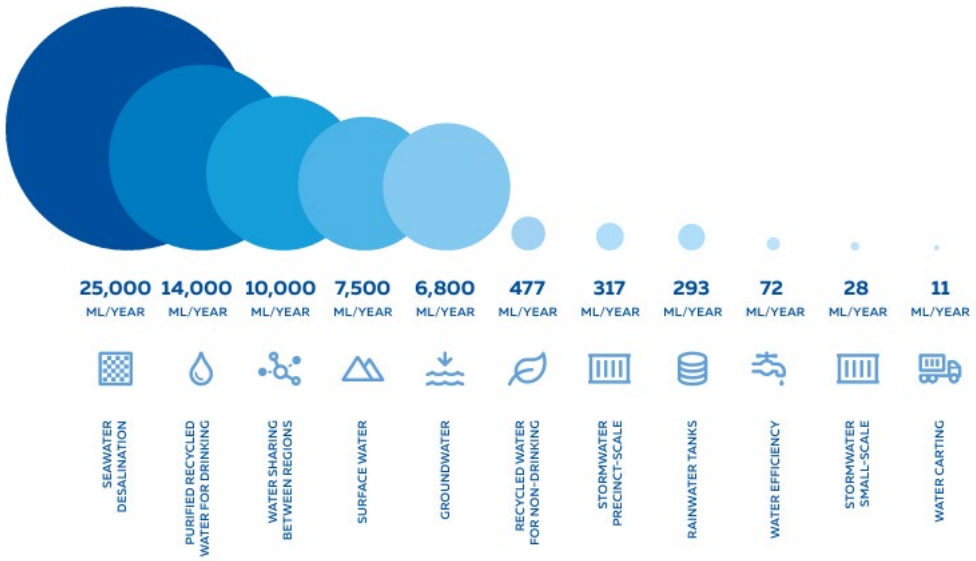
More information can be found in WSAA's report Blue x Green = Thriving: A progress report on water's role for thriving communities

Recycled drinking water is a further opportunity

Integrated water management is often interpreted narrowly, assumed to mean the use of alternative sources (e.g. recycled water or stormwater) only for non-drinking purposes, such as irrigation or industrial use.

This limited framing misses the full value of integration. A truly integrated approach assesses all water sources and all end uses — including drinking — and matches supply with demand in the most sustainable, cost-effective way. While non-drinking uses are important, they typically make up only a small portion of total urban water demand, particularly in dense metropolitan areas. Recycling for irrigation alone is unlikely to close the demand–supply gap facing major cities. All water supply options can support water security, including all forms of water recycling. However, non-drinking forms of recycling often do not have enough yield to meet future challenges, as shown in WSAA's 2020 All options on the table: Urban water supply options for Australia, which provided the median yields of different options.

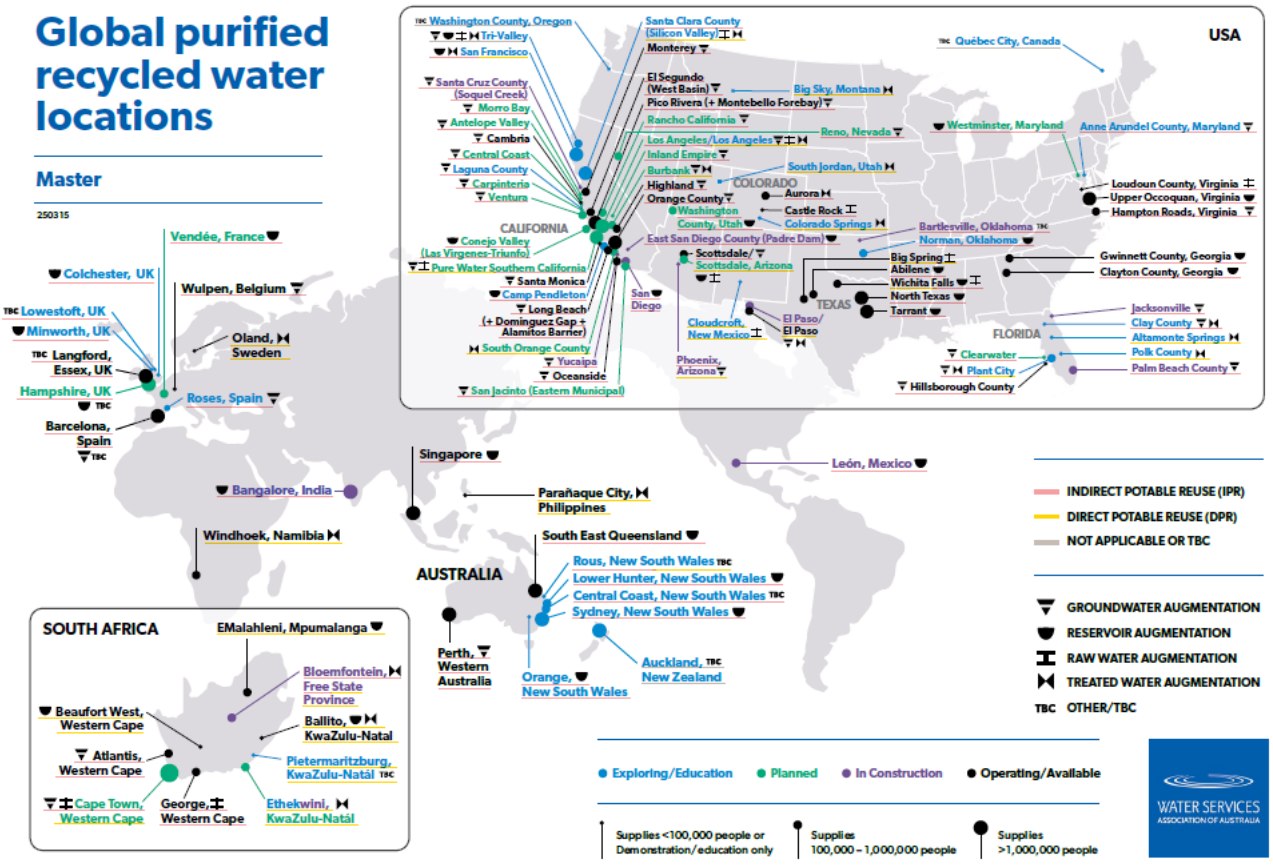
FIGURE 7 Median yield of water supply options included in WSAA study ML/YEAR = MILLION LITRES PER YEAR



If Victoria is to maximise the benefits of IWCM, purified recycled water for drinking must be considered on merit alongside other options. The Strategy should recommend the Victorian government adopt an 'all options on the table' approach to water supply planning.

WSAA strongly supports the Draft Strategy's emphasis on climate adaptation. Across the globe, water utilities and governments are increasingly turning to rainfall-independent sources as part of climate resilience strategies. Australia has particularly adopted seawater desalination, such as during the Millennium Drought, which saw large plants introduced in major capital cities.

Desalination is a reliable option, though typically the highest cost and most energy-intensive supply option. Purified recycled water for drinking offers comparable security and safety, often at lower cost and with a lower energy footprint. It is now being adopted at scale in jurisdictions such as California, Singapore, Cape Town and Auckland, and is already part of the drinking water supply in over 35 cities across ten countries. WSAA has developed global maps of the prevalence of this option:



WSAA supports the recommendation to investigate the costs and benefits of purified recycled water for Melbourne and Geelong. In our view, the question is not whether purified recycled water will be needed, but how soon it will be needed, and how best to bring the community on the journey. An explicit commitment to an 'all options on the table' approach is consistent with the Urban Water Planning Principles agreed by all governments under the National Water Initiative.

This recommendation should cover all of Victoria – there is no reason purified recycled water cannot offer similar potential benefits outside Melbourne and Geelong, particularly when desalination is not a viable option for many inland cities. As such, it should be considered alongside other options in all water planning processes.

Recycled water for non-drinking has been fairly well adopted throughout Australia for some time. Purified recycled water for drinking is in many ways a natural progression from this as there are often substantial economies of scale to be gained.

In the national context, in Western Australia, Perth's groundwater replenishment scheme recharges aquifers with purified recycled water. Trials were undertaken from 2010 and the approach included a comprehensive community engagement program. Bipartisan support was achieved and the scheme was successfully commissioned in 2017. In 2022, its capacity was doubled, with ongoing community acceptance of purified recycled water for drinking.

Many other Australasian jurisdictions have identified purified recycled water for drinking as a promising option to meet future water needs, as shown below in the most recent snapshot of global purified recycled water for drinking activity. Over 35 cities worldwide have already adopted purified recycled water for drinking as part of the local drinking water supply. Over 30 million people already rely on and consume it. By 2050 this could reach over 100 cities and places, and more than 55 million people.

Gap: Removing Policy Bans and Aligning with National Reform

Victoria has made commendable progress in water strategy development and investment. However, a long-standing policy reluctance to consider purified recycled water for drinking remains, despite its proven track record and safety. This stance is out of step with:

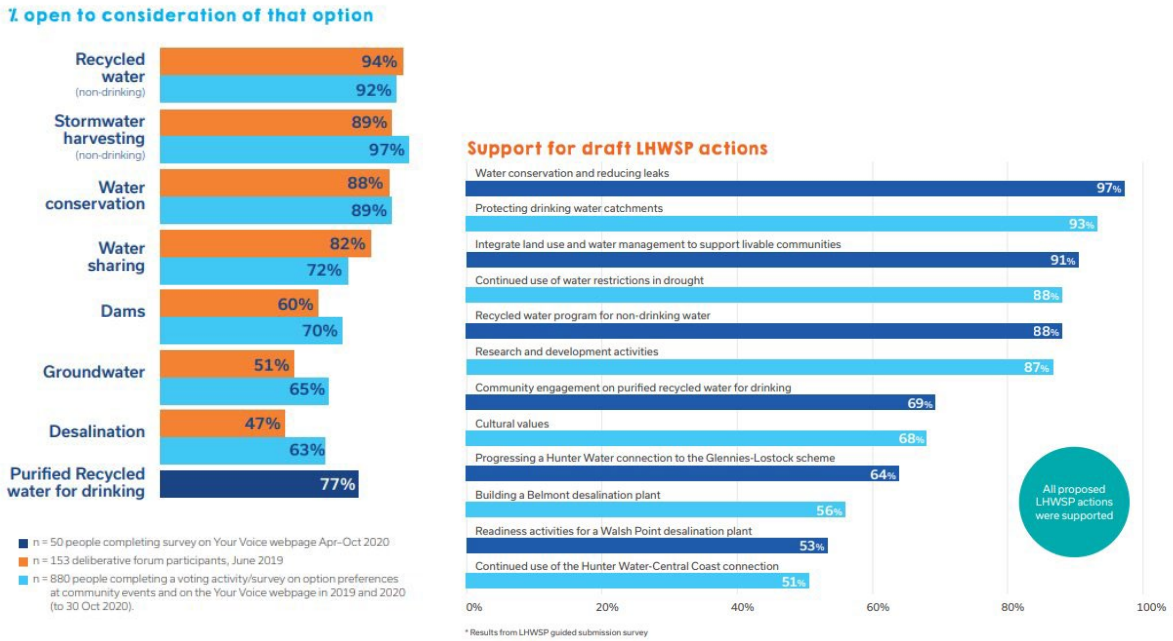
- National Urban Water Planning Principles under the National Water Initiative (2008), which call for full and transparent consideration of all options;
- Productivity Commission recommendations, which stress the need to remove policy bans that prevent efficient outcomes;
    - the Productivity Commission National Water Reform Report (2018) recommended in regard to urban water to, *"consider all options fully and transparently, including both centralised and decentralised approaches (including indirect and direct potable reuse…)"* The response from the Australian Government the following year was to support the recommendation (6.1), noting that implementation was a matter for relevant states and territories (Australian Government Response to Productivity Commission *National Water Reform* Report (2019)).
    - That same year, the Infrastructure Australia Audit (2019) provided an assessment of Australia's future infrastructure needs, reporting that purified recycled water for drinking can play a greater role in supporting liveability*, "Direct potable reuse could provide an additional non rainfall dependent water resource that is cheaper to produce than desalination and a more flexible part of water networks than decentralised schemes."*
    - the Productivity Commission's Integrated urban water management — Why a good idea seems hard to implement Research Paper (2020) explores the policy bans that sometimes restrict all options being put on the table, *"suitably treated recycled wastewater or treated stormwater cannot be used to directly augment the supply of potable water in all states and territories, even when that water meets exactly the same strict public health standards that apply to potable water."*
- the Australian Guidelines on Water Recycling (Phase 2), which incorporated with the Australian Drinking Water Guidelines, enable purified recycled water to be used to supplement drinking water supplies;
- the consultation report for delivering a new National Water Agreement spoke to the *"need for all water supply options to be on the table and considered on their merits in decision-making."* Feedback included better support for purified recycled water for drinking.
- Other jurisdictions, where purified recycled water is being actively pursued and adopted as part of mainstream planning. For example the World Health Organization and the US EPA have now published substantial guidance volumes on using purified recycled water as part of drinking water supplies.

In the current context of rising costs, increasing climate variability and long-term demand pressures, maintaining a policy ban on a well proven water supply option is no longer a sensible policy position. Such a position hinders the ability of utilities and communities to assess the best-fit solution for their circumstances. Rather than inhibit this, the Victorian government should remove all policy bans on the use of purified recycled water for drinking. Governments at all levels should also lead the way in education programs to help communities understand the benefits of purified recycled water for drinking as well as desalination, stormwater reuse and other options.

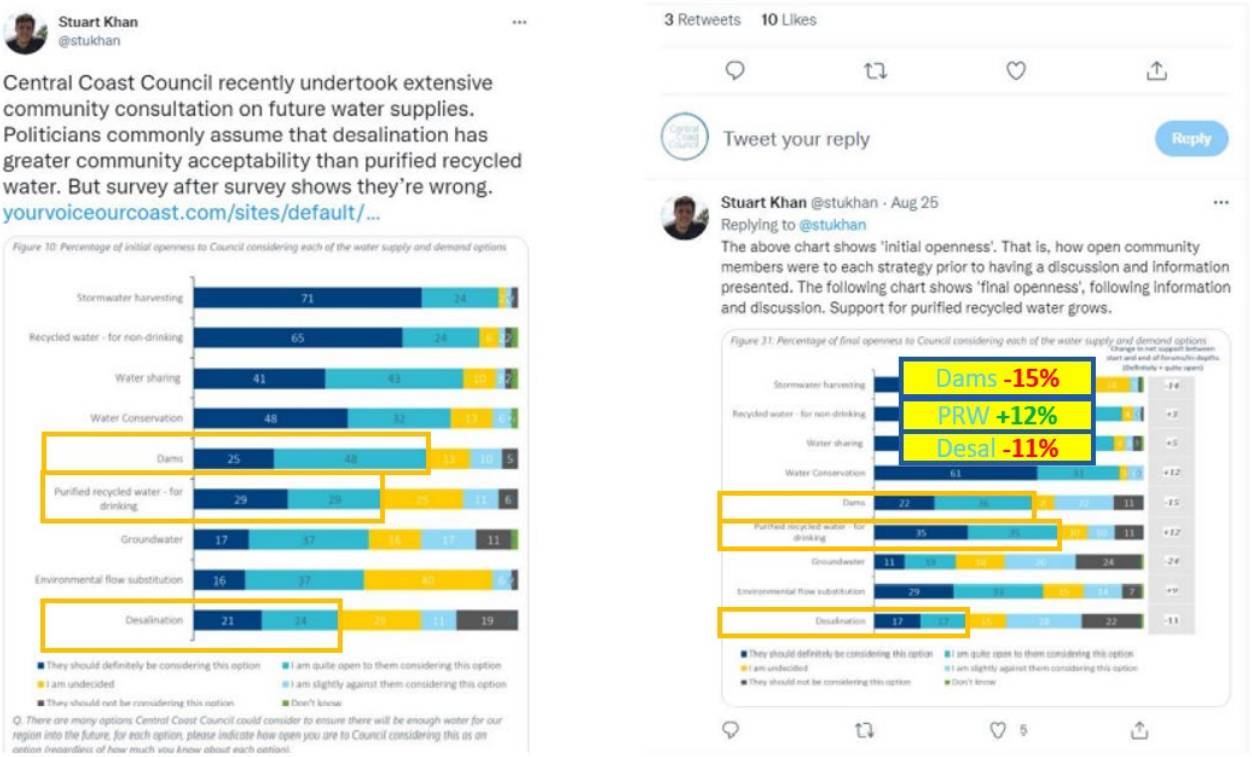
Community Support and Engagement

International and Australian experience confirms that community support for purified recycled water grows significantly with information and context. Engagement programs, such as those delivered by Sydney Water and Watercare in Auckland, show that people respond positively when given the opportunity to understand the science, need and safety of these schemes.

Hunter Water conducted community consultation on its Lower Hunter Water Security Plan (2019-20), which revealed 77% of focus group participants were open to considering purified recycled water for drinking, with even higher support for progressing community engagement about it, than for a range of other options as shown in their consultation report.



In 2021, Central Coast Council placed its Water Security Plan on public exhibition for six weeks. Recycled water for non-drinking was supported by 92% of respondents, while 70% supported purified recycled water for drinking. Interestingly, purified recycled water for drinking received more support than desalination. Openness of community members to these options was also evaluated – this tracked 'initial openness', prior to a discussion and information presented on a topic, and 'final openness'. Openness to purified recycled water for drinking increased by 12% when more information was shared. A similar trend can also be seen in the Lower Hunter Water Security Plan consultation and backed by the Productivity Commission's Green Paper: Continuing the productivity conversation (2020) which notes that *"Stakeholders argued that resistance to recycled water will diminish as people engage with decision-makers and learn more about recycling."*



The NSW Government conducted its own consultation on the Greater Sydney Water Strategy in 2021, and found that recycled water use in all forms was *"overwhelmingly supported in the feedback received"* (see photo, right).

Auckland's water utility Watercare, recently assembled a Citizens Assembly of 37 citizens representing a cross-section of backgrounds. They were asked to identify their preference for Auckland's next future source of water. When presented with information, they nominated 'direct recycled water' (purified recycled water for drinking) as the next source of water for Auckland.

Recycled water uses

Recycled water uses including stormwater reuse and purified recycled water for drinking are overwhelmingly supported in the feedback received.

Feedback emphasised the importance of driving demand management and water efficiency options, as well as enabling training and information sharing to assist communities in responding to climate change.

Infrastructure NSW included recommendation to build a PRW demonstration plant in Sydney:

Excerpt from NSW Productivity Commission White Paper 2021:

Recommendation (5.4) *"Work with utilities to explore investment in demonstration plants to help NSW communities to understand the water cycle and build trust in purification technology."*

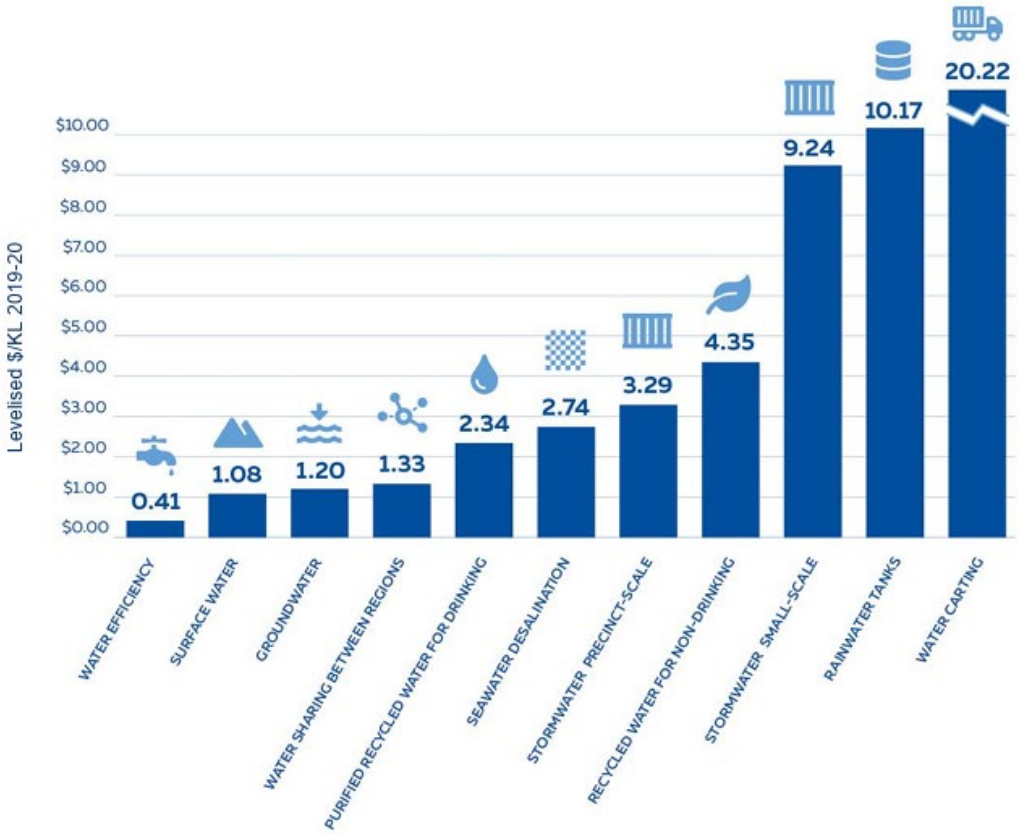
Sydney Water's Purified Recycled Water Discovery Centre at Quakers Hill has welcomed over 2,930 visitors since opening. The facility has hosted visitors including Members of Parliament, local councils, business leaders, academics, international and national water experts, industry bodies, international delegations, schools and universities, customers and community members, all keen to learn more about purified recycled water for drinking and Sydney Water's plans to secure the water supply for generations to come. Survey results show an increase in support for purified recycled water for drinking after the tour, with an average comfort level of 8.9 on a 10-point scale (1 Not comfortable to 10 Very comfortable) for it being used in Greater Sydney's water supply.

WSAA encourages Infrastructure Victoria to support early, transparent engagement with communities on purified recycled water for drinking, as part of broader resilience and supply planning.

WSAA developed a toolkit with a range of resource materials on purified recycled water for drinking and recently launched Purified Recycled Water maps package on our Water360 website, videos, testimonials, case studies, lessons learnt from other jurisdictions and animations. These can be used by governments and water utilities.

Cost-Effectiveness and Equity

Purified recycled water is not only climate resilient — it is often more cost-effective than other large-scale supply options. WSAA's report *All options on the table: Urban Water Supply Options* (2020) found that purified recycled water often compares favourably to desalination on capital and operational costs, especially when integrated into existing infrastructure. For example a purified recycled water solution in Sydney can meet 25% of future needs and save $2 billion compared with a solution using more desalination. These options need to be explained to customers so that they can understand the portfolio of solutions that are ultimately adopted.



Importantly, purified recycled water is uniquely flexible as can be adopted inland. Its ability to serve diverse geographies while helping contain future bill pressures aligns closely with government goals for affordable essential services in a high cost of living environment.

Gap: Water efficiency

While the Draft Strategy mentions energy efficiency, it neglects water efficiency. Water efficiency options can help deliver many of the outcomes of the Strategy, including climate change mitigation and adaptation, sustainability, environmental, social and economic benefits.

WSAA notes that the Victorian Department of Energy, Environment and Climate Action imposes Target Your Water Use for regional Victorians and Target 150 in Melbourne – such programs could be applied across all of Victoria.

WSAA proposes some additional recommendations:

- Promote and integrate Water Efficiency Labelling Scheme (WELS) and Smart Drop Certified programs into Victoria's water efficiency framework. These certifications will not only raise awareness but also guide consumers and businesses towards purchasing products that will make a significant difference in water savings. Additionally, aligning both programs with existing water efficiency standards will streamline compliance, increase the availability of high-efficiency products in the market, and contribute to long-term sustainability.
- Launch statewide campaigns to educate the public on the importance of water conservation and practical measures to reduce water usage.
- Involve communities in water management decisions to ensure policies reflect local needs and priorities, fostering a culture of shared responsibility.
- Implement Smart Water Metering and Data Analytics: Deploy smart water meters across residential, commercial, and industrial sectors to provide real-time data on water usage, enabling prompt leak detection and efficient water management.
- Utilise data analytics to offer consumers insights into their water usage patterns, promoting conservation behaviours and informed decision-making.

Recommendation 26 Better use government land for open space and greenery

The water sector can have available land that can be compatible with creation or expansion of green/blue assets that combine urban amenity with environmental protections (eg public park spaces that incorporate wetlands for flood management). The opportunities will be even greater if water and land use planning are done concurrently, rather than land use planning making assumptions about water availability and water services being plotted in later.

There are also opportunities for integrated water management approaches to maximise green space with minimal new water use through stormwater harvesting and reuse, recycled water and other options. We recommend that this recommendation explicitly include mention of planning for effective water provision.

Recommendation 27 Better prepare infrastructure for climate change

Extreme weather events are becoming more common and having increasingly dangerous impacts on communities and infrastructure. As an essential service for all Victorians, water utilities are committed to improving the climate resilience of their infrastructure and operations.

We encourage the Victorian Government to support water utilities to invest in the technology, skills and capabilities they need to build resilience in a changing climate. This includes investment to identify and retrofit existing infrastructure where necessary, and supporting research, development and innovation to build climate resilient infrastructure for the future.

See more detail in: Climate change: Accelerating to Net Zero

Recommendation 35 Prepare and publish infrastructure sector plans to shape Victoria's cities

We suggest that the Draft Strategy agree a set of assumptions for future population, jobs and

land use for more compact cities. Require each department that owns infrastructure to develop an infrastructure sector plan as soon as possible, based on these assumptions, and publish strategic-level plans. Use the finished sector plans to decide infrastructure project funding.

The water sector supports the concept of developing infrastructure plans to help improve Victoria's cities. In doing this it is essential that the plans are fully integrated across all aspects of city design, being clear on who is the lead agency to manage and oversight each plan. They should not be developed and managed independently by each relevant government department. To establish each integrated plan it is essential that all relevant parties are involved in all stages of the plan development and execution, to ensure the most efficient and cost-effective delivery of the plan outcomes for the community.

Separately, there needs to be a designated agency responsible for not only oversighting each plan development but also in charge of developing the key assumptions for departments in the development of the plans. These assumptions should involve strong engagement with each of the relevant departments.

Recommendation 36 Reform infrastructure contributions

While water infrastructure contributions are not mentioned in the Draft Strategy, they have been in place for some time in the form of New Customer Contributions (regulated by the Essential Services Commission). Such contributions are a fair way of sharing the cost of housing development. They should provide a sensible balance cost reflectivity so as to send a signal that encourages development in lower cost areas ahead of higher cost areas, and simplicity.

WSAA supports the current methodology review by the Essential Services Commission. If it can reduce the complexity and confusion, while improving the cost reflectivity, it will be a step forward in the fair sharing of the costs of growth. We note that the Melbourne contributions will be reviewed separately as they operate under different principles… and we suggest strong consideration be given to a simple set of principles that can apply in all locations.

Recommendation 38 Prepare for more recycling and waste infrastructure

The water sector is keenly interested in the potential of resource recovery and optimisation from wastewater and biosolids, such as the production of biogas and biocrude from waste products.

Across Australia, there are exciting opportunities emerging for the co-location of wastewater treatment and resource recovery infrastructure in 'circular economy precincts' on utility-owned land, in partnership with government and industry.

A great example of the circular economy in Victoria is Yarra Valley Water's facility at Wollert, which processes commercial food waste into renewable energy to power the nearby sewage treatment plant, and exports excess power to the grid.

We encourage the Victorian Government to support more water utilities to invest in the technology, skills and capabilities they need for a circular economy future. This includes supporting research, development and innovation in recycling and waste infrastructure.

Help us help you: Australian water sector opportunities and barriers to circular economy is a report WSAA submitted to Minister for Environment and Water, Tania Plibersek, and the Commonwealth Department of Climate Change, Energy, Environment and Water's Circular Economy Ministerial Advisory Group. We are pleased that some of our recommendations have been adopted in the Group's Final Report.

Recommendation 39 Use digital technologies to better design, build, operate and maintain government infrastructure

We propose that Victoria pilot digital technologies on government infrastructure projects and report on their progress. Use building information modelling on major infrastructure and housing projects. Improve capabilities in government agencies and review procurement processes to promote greater use of digital technologies.

The use of digital technologies can create significant efficiencies. In doing this it is important to ensure that there are consistent foundational approaches to establishing and growing the digital capabilities of government. The approach of Infrastructure NSW provides a useful basis on which to build. They are currently developing a whole of government digital strategy, to be accompanied by technical support guidance and training to build staff capacity. This aligns well with the proposed approach of the Victorian Government.

In doing this the Victorian Digital Asset Strategy provides a strong digital asset management foundational approach. It could be augmented by providing details for the application to different sectors, particularly looking at: standardised asset naming conventions, product data templates, the fundamentals that support the deployment of digital twins, building information management systems, and automation – looking to apply these across all government departments, suppliers and stakeholders.

In lifting the digital aspects of government a key consideration is ensuring appropriate management of cyber security risks. An appropriate framework would be of value. Particularly one that fully aligns with the requirements of the Australian Signals Directorate and Attorney General's Department but incorporates Victorian government requirements.

Gap: Research, development and innovation (RD&I)

The Draft Strategy focusses on infrastructure, however it does not articulate the role of RD&I in driving long term infrastructure outcomes, recognise the systemic value of investing in research to address emerging infrastructure challenges, or acknowledge or leverage Victoria's innovation ecosystem (eg Intelligent Water Networks (IWN), Water Research Australia, CSIRO, and other research centres and universities).

Over a 30 year period it makes sense to complement proposed infrastructure measures with some focus on research, development and innovation – including implementing and scaling known and future technologies. This would enhance the capacity to respond to uncertainty and complexity, improve infrastructure efficiency, resilience and adaptability, and support local industry development and high skill job creation.

WSAA recommends that the Final Strategy:

- Embeds RDI as a Strategic Enabler
- Supports Innovation Partnerships for Infrastructure Transformation – in particular focus on development – trials and scaling.
- Establishes funding for RD&I that focuses on solving key problems and brings different types of organisations together to get best results.
- Leverages Demonstration Projects to Build Evidence for Reform – incorporate trials into larger infrastructure projects to obtain data and insights for future. The Purified Recycled Water pilot is one example but there could be many more.
- Includes Water Sector Innovation as a Priority Use Case – given the role water plays in climate resilience, public health and economic productivity.

Contact

WSAA thanks Infrastructure Victoria for the opportunity to contribute to this important process and stands ready to work with government, utilities and the community to ensure Victoria's water future is secure, sustainable and inclusive. WSAA welcomes the opportunity to discuss this submission further.

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