

## **Draft NSW Water Strategy – Public Consultation**

**Submission from the Australasian Bottled Water Institute [ABWI]**

**Submitted via email to [nsw.waterstrategy@dpi.nsw.gov.au](mailto:nsw.waterstrategy@dpi.nsw.gov.au) on [REDACTED]**

### **About ABWI**

The Australasian Bottled Water Institute [ABWI] is a dedicated division of the Australian Beverages Council Limited [ABCL], the peak body representing ninety per cent of the Australian non-alcoholic beverages industry by volume. The bottled and packaged water industry contributes more than \$700 million to the nation's economy each year and employs over 3,200 FTEs of which New South Wales represents over 36 per cent of the industry<sup>1</sup>.

ABWI is the leading industry association and certification body for bottled water standards covering both bottlers and water source owners in Australia, New Zealand and the South Pacific. Bottled water from ABWI Member companies must comply with strict guidelines on quality, safety and sustainability as stipulated in the ABWI Model Code and must maintain ABWI accreditation by submitting reports and undergoing an annual third-party independent audit. ABWI has been certifying bottlers and water source owners for over twenty years.

ABWI Members recognise the value of good water stewardship, and proactively support environmental protection and management initiatives. As the peak body representing the bottle water industry, the ABCL has reviewed the draft NSW Water Strategy and identified common priority actions and possible opportunities for synergies between ABWI and the Department of Planning, Industry and Environment [DPIE].

### **Priority 1: Build community confidence and capacity through engagement, transparency and accountability**

- 1.2 Increase the amount and quality of publicly available information about water in NSW
- 1.3 Enhance modelling capabilities and make more data and models openly available

Despite water extracted for commercial bottling purposes comprising a small percentage of all groundwater used (typically <1%), there is a perception in some communities that the industry is:

- not regulated to a high standard and sources are not managed responsibly;
- extracting significantly higher volumes of water compared to other users;
- contributing to a disproportionately large volume of traffic via water transportation; and
- unresponsive to community concerns with respect to sourcing and local amenities.

With this in mind, and with the desire from the bottled water industry to demonstrate its responsible management of groundwater sources, ABWI, in collaboration with the Queensland Department for Natural Resources, Mines and Energy [DNRME], developed an [interactive water extraction map](#). This map is publicly available and was designed to provide greater transparency about water extraction for commercial bottling purposes across Local Government Areas [LGAs]. In a [press release](#), and on

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<sup>1</sup> IBISWorld. Bottled water manufacturing in Australia, Feb 2019

the floor of the Queensland Parliament, Minister Butcher acknowledged our efforts to help build transparency, accountability and community confidence in the water industry's operations.

These leadership initiatives, developed in collaboration with the DNRME, are the first of their kind in the world for the bottled water industry. ABWI would like to invite NSW to collaborate on this project and extend the water extraction map to include NSW in the aim of supporting the Department's work under priority 1.

### **Priority 3: Improve river, floodplain and aquifer ecosystem health, and system connectivity**

- 3.6 An enhanced, state-wide focus on sustainable groundwater management

Members of ABWI are good stewards of the environment and are continuously developing innovative and efficient ways to use and conserve this critical resource.

The bottled water industry uses groundwater as its main source of high-quality water, a natural resource that is replenished through the hydrological cycle. ABWI supports responsible water source management through the continuous and rigorous assessment of source sustainability.

The bottled water produced by ABWI members must meet the standards of the ABWI Model Code. These standards go beyond the minimum requirements of a food safety program and guarantee the safe bottling of water to a high quality. In 2020, ABWI published and adopted changes to the [Model Code](#) to embed greater sustainability provisions, creating a new third pillar alongside quality and safety.

As part of the ongoing accreditation process, ABWI members are required to ensure that they adhere to the non-negotiable, industry-leading sustainability criteria of the code, including but not limited to, the requirement to collate and tabulate local water levels, rainfall data, groundwater extraction volumes and conduct hydrogeological studies.

Another key performance metric is the water use ratio which is the average amount of water used within a bottlers facility to produce one litre of bottled water (including the water in the bottle). In general, packaged water facilities have the lowest water use ratio when compared to other beverage sectors<sup>2</sup>. Looking for continuous improvement however, the industry continues to explore innovative solutions to further improve water efficiency.

### **Priority 5: Support economic growth and resilient industries within a capped system**

- 5.3 Improve the operation and transparency of water trade in NSW

ABWI is dedicated to the responsible management of all water sources and supports comprehensive water resource management plans that use sound science, are comprehensive, and treat all users in an equitable manner, for the sustainability of this natural renewable resource today and in the future.

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<sup>2</sup> Antea Group. 2018 Water and Energy Use Benchmarking study: executive summary. Accessed 12.6.2019 [www.bottledwater.org/public/IBWA\\_ExecSummary\\_14Nov2018\\_0.pdf](http://www.bottledwater.org/public/IBWA_ExecSummary_14Nov2018_0.pdf)

ABWI is committed to working with the NSW DPIE to ensure that the bottled water industry operates in a responsible and transparent manner. ABWI is committed to safeguarding the industry for continuous sustainable growth ensuring its longevity for future generations.

**Priority 6: Support resilient, prosperous and liveable cities and towns**

- 6.9 Enable private sector involvement in the NSW water sector

As the unified voice of the non-alcoholic beverages industry, the ABCL offers its Members a presence beyond individual representation. The ABCL is an important conduit between the non-alcoholic beverage industry and governments, supporting the Australian Government, State/Territory Governments and Local Councils. Like many other sectors, the drinks industry has a long history of partnering with governments on a range of important matters.

Our dedicated water division, the Australasian Bottled Water Institute, is ready and waiting to partner with the NSW Government to collaborate on the likeminded priorities identified in the water strategy.

We warmly welcome the Department's involvement in our industry-leading water extraction map initiative and will reciprocate in offering our expertise, industry insight and voice where required.

**For further information:**

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# Draft NSW Water Strategy

Submission form



## 1. Information on confidentiality and privacy\*

I give permission for my submission to be made publicly available on the NSW Department of Planning, Industry and Environment website.

- Yes  
 No

I would like my personal details to be kept confidential.

- Yes  
 No

## 2. Your details

Name\*  Contact phone number\*

Postcode\*  Email address\*

Do you identify as an Aboriginal person?

- Yes  
 No

Are you an individual or representing an organisation?\*

- Individual  
 Organisation

## 3. Organisation or business details

Who do you represent?

- Government
- Peak representative organisation
- Local Water Utility
- Other (please specify)