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Submission to:

National Water Reform 2026: Water Services Reform Directions - Interim Update 1

Submitted by:

Thi Ha Lien Le – Research Fellow, Water Justice Hub, Crawford School of Public Policy, Australian National University

R. Quentin Grafton – Emeritus Professor, Water Justice Hub, Crawford School of Public Policy, Australian National University

Our submission primarily addresses **Information Request 7: Nationally Consistent Reporting on Drinking Water Quality** and also responds to some elements of **Information Request 6: Standardised Tools for Consumer-led Planning, Monitoring and Evaluation**. Given the interrelated nature of the consultation questions, several of the issues and recommendations presented are also relevant to **Information Request 8: Role of Australian Government investment and funding program**.

1. Information Request 7: Nationally Consistent Reporting on Drinking Water Quality

1.1. *Is legislative change to enact reporting standards the most appropriate way to facilitate greater national consistency in drinking water quality data? If not, what alternative approach could improve consistency, noting the current Australian Drinking Water Guidelines (ADWG) have been inconsistently adopted and applied?*

The inconsistent adoption and application of the non-mandatory ADWG occurs not only across jurisdictions, but also across water service providers within the same jurisdiction, and across years within the same water service providers (Le et al., 2026). The central concern, therefore, is not only the lack of data but also its lack of comparability, reliability, and usability across jurisdictions, water service providers, and over time for regulation, public health protection, and national water reform. This, in turn, would lead to the following problems:

(i) Underlying issues being masked including inequity in access to clean, safe, and acceptable drinking water and under- or over-estimation of health and acceptability risks.

(ii) Reduced transparency and accountability of water service providers.

(iii) A fragmented evidence base at both jurisdictional and national levels that limits the ability to track trends and conduct analysis, which in turn undermines national monitoring, long-term planning, and policy coordination and effectiveness.

This situation underscores the need for a mandatory nationwide legislative reporting standards, which would enable a standardised, inter-governmental public-access platform to integrate drinking water data across jurisdictions (e.g. an initiative such as the Australian Drinking Water Record (ADWR) by the Water Justice Hub (Australian National University, 2026), available at http://auswaterquality.org). This data infrastructure is essential to strengthen the knowledge and evidence base to inform improved policy and planning for more secure, resilient and sustainable water services delivery.

1.2. *What national reporting standards would be most useful (for example, minimum, maximum, average values for water quality compliance outcomes; boil water alerts; do-not-drink notices)? What elements of the ADWG could be drawn on for national reporting standards?*

The development and adoption of national reporting standards should draw on the ADWG and should be informed by expert and multi-stakeholder consultations. Experience from developing

the ADWR highlights the following key considerations for the design of national reporting standards:

(i) Mandatory range of health-based and acceptability-based parameters.

(ii) Mandatory statistical measures, including but not limited to maximum, minimum, average, number of samples, number of non-compliant samples, and sampling frequency.

(iii) Standardised rounding rules for statistical measures used in compliance assessment.

(iv) Reporting of detailed water quality testing results for each individual sample in addition to annual summary statistics (e.g. Water Quality Portal by TasWater (2026)), to enhance transparency and enable detection of persistent non-compliance patterns (e.g. more granular daily or event-based data), which can provide more robust insights into underlying non-compliance.

(v) Consistent reporting structure based on sampling locations, towns, or suburbs, including GIS-compatible geographical coordinates for each service area.

(vi) Recommended point-of-use (tap water) sampling and testing.

(vii) Standardised inclusion of boil water alerts and do-not-drink advisories, including the affected location(s), water supply system (s), reason for issuance, date of commencement, date of lifting, relevant public health information and actions taken.

1.3. *Which Commonwealth agency(s) are best placed to be involved in the process of data collection, analysis, custodianship and coordination to improve national consistency in data and reporting?*

The development of standardised data reporting would need to be coordinated at the Commonwealth level. There are two possible options for hosting this data infrastructure:

(i) Australian Bureau of Statistics (ABS): A well-established statistical authority with strong existing data governance systems, independence, objectivity, and confidentiality safeguards. Once reporting becomes mandatory and standardised, ABS could be well suited to host the database.

(ii) Department of Climate Change, Energy, the Environment and Water (DCCEEW): A national policy coordinator for water, responsible for the National Water Agreement and investment through the National Water Grid, including policies supporting water services in rural and remote areas and for First Nations communities. DCCEEW has strong authority to coordinate, close alignment with existing policy frameworks, and clear links to policy and investment decisions.

In addition, it is important that this data infrastructure be funded by the Commonwealth Government, for example, through the National Water Grid, and should serve as the benchmark for problem identification in project proposals and for project monitoring and evaluation under frameworks such as the National Water Grid Investment Framework *(also a response to Information request 8: Role of Australian Government investment and funding programs, Point 1 on improvements to governance arrangements to facilitate better funding provision)*.

1.4. *How could the process to develop consistent reporting standards be designed to benefit and account for the end uses of a range of stakeholders – including customers and consumers, regulators and government agencies, and community-controlled organisations?*

The reporting system and standards need to be designed to be fit for people, place, and purpose. Some key considerations are outlined below to ensure they reflect and support the needs of a range of stakeholders:

(i) Inclusion of all systems, including small and large utilities, self-managed and First Peoples-managed systems, recognising the diversity of governance and capacities.

(ii) Adoption of a multi-layered monitoring approach, integrating data collected by water utilities with community-led monitoring initiatives and Indigenous knowledge systems. This would strengthen data coverage, improve local relevance, and support more responsive identification of water quality issues, particularly in remote, small, and First Nations communities.

(iii) Incorporation of independent monitoring and consumer-led monitoring mechanisms to ensure data integrity, consistency, and credibility, as well as to enhance public trust and accountability.

(iv) Meaningful consultation and inclusion of communities/consumers as key stakeholders in the design and implementation of the reporting system, as well as interpretation of outcomes.

(v) A reporting system that is accessible, user-friendly, and transparent for all stakeholders, with data presented in clear formats and appropriate levels of detail for different users, supported by capacity building and financial support to enable effective implementation and use.

1.5. *How could national reporting requirements be implemented and enforced to minimise costs and regulatory burdens for service providers? For example, by using technology to streamline reporting and reduce duplication (such as the central repository managed by NSW Health), or by staging implementation to support providers to adjust to changes (as in the rollout of Queensland's Statewide Water Information Management system).*

While implementing a standardised national reporting system may increase costs in the short term, it is likely to reduce reporting burdens over the longer term. In the absence of standardised reporting requirements, there can be a paradoxical increase in reporting burden, as water service providers may need to reformat or reinterpret the same data to meet the differing requirements of state regulators, health departments, auditors, and other agencies.

To minimise costs and regulatory burdens for water service providers, a nationally consistent reporting template and a digital reporting platform should be developed to standardise data submission and streamline reporting processes. Implementation could be staged in two ways:

(i) A staged governance approach with data initially collected and managed through centralised state or territory repositories before being aggregated into a national repository.

(ii) Progressive reporting requirements with implementation timelines tailored to system type. This would begin with a minimum mandatory dataset and core reporting indicators, gradually expanding as systems, capabilities, and resources mature, until all systems meet the same standardised requirements.

Where appropriate, the system should build on existing reporting platforms and data infrastructure to reduce duplication, leverage established capabilities, and minimise implementation costs.

1.6. *In addition to drinking water quality reporting, are there other service outcomes (for example, reliability and affordability) where greater national consistency in definitions and reporting would support more secure, resilient and sustainable water services delivery?*

In addition to drinking water quality reporting, other service outcome indicators are also needed to fully capture the dimensions of access to drinking water that is safe, acceptable, accessible, reliable, and affordable. In doing this, several considerations should be taken into account:

(i) Clear definitions of these dimensions, and appropriate corresponding indicators, are required.

(ii) Some data can be derived from existing utility operational and billing systems (e.g. The National Performance Report (BOM, 2026)) but should be reported by location in addition to by system, to remain consistent with the broader reporting framework.

(iii) Other data will need to be collected through different sources and methods. For example, globally validated experiential tools and measures could be used for consumer-led planning, monitoring and evaluation that capture household and individual experiences of water insecurity, providing insights beyond those available from conventional service-based indicators (e.g. the Household and Individual Water Insecurity Experiences scales (HWISE/IWISE) (Young et al., 2019)).

1.7. *What approaches to nationally consistent reporting on drinking water quality would support Indigenous data sovereignty and Indigenous data governance?*

Data governance for the proposed reporting system must comply with Indigenous Data Sovereignty principles, with reference to the Maiam nayri Wingara Indigenous Data Sovereignty Collective (Maiam nayri Wingara, 2018) and the CARE Principles (Carroll et al., 2020). This can be implemented through a tiered approach. Public information from water service providers, along with nationally aggregated data, can be publicly available. For data derived from community-led monitoring and self-managed systems, First Peoples communities must retain authority over the collection, access, and use of data relating to their own water systems, including the right to determine what is shared beyond the community level and at what level of detail. Community-controlled organisations should be engaged as formal partners in the design and governance of the reporting system from the outset.

2. Information request 6: Standardised tools for consumer-led planning, monitoring and evaluation

2.1. *What lessons are there from other consumer- or community-focused tools and processes in related areas (for example, water management, health) that could inform the development of equivalent tools for water service provision in regional and/or remote areas? Are there any potential risks or unintended outcomes of using standardised tools and processes, and how could they be avoided?*

Experiential tools such as HWISE/IWISE offer a robust, standardised, yet flexible approach to consumer-led planning, monitoring, and evaluation (Young et al., 2024a). They capture and amplify community voices and lived experiences of water insecurity, complementing existing metrics that primarily focus on observable service and environmental indicators (e.g. freshwater availability and safely managed drinking water services). In doing so, they help ensure that community perspectives are reflected in policy and decision-making.

The WISE Scales are short, simple, adaptable, and globally validated across diverse cultural contexts. They enable consistent monitoring of water insecurity over time and facilitate comparisons across regions and countries. The scales have been adopted by more than 100 organisations in over 55 countries to informing advocacy, program targeting, and governance, while providing actionable insights in humanitarian settings and strengthening monitoring and evaluation of interventions (Young et al., 2024b). The HWISE Scale is consistent with the underlying principles of Sustainable Development Goal 6 (SDG6) and can be a complementary tool for SDG6 monitoring (Young et al., 2019). In Australia, the scales have been implemented in Walgett, New South Wales, where the findings supported community-led actions to improve access to clean and safe drinking water (Tonkin et al., 2023).

2.2. *How could adoption of standardised tools and processes support improved consumer-led planning and overall water service outcomes? How could such tools be applied to ensure*

accountability of service providers and government agencies for service outcomes? How could the outputs from locally implemented community tools for planning, monitoring and evaluation inform government processes at a jurisdiction or national level? How could they be adapted to local needs and contexts including, but not limited to, culturally appropriate methods for Aboriginal and Torres Strait Islander communities?)

Experiential tools can be applied to strengthen accountability of service providers and government agencies for service outcomes by embedding them as conditions of funding, as well as using them to monitor project outcomes, for example under frameworks such as the National Water Grid Investment Framework (also in response to *Information Request 8: Role of Australian Government Investment and Funding Programs, Point 1 on improvements to governance arrangements to facilitate better funding provision*).

This is also an approach to facilitate consumer-led planning. In a specific project setting, consumers and communities should be actively engaged in the co-design of the tools, their implementation, the interpretation of outcomes, and the design of solutions. This also provides a valuable mechanism for independent monitoring and public reporting of outcomes, ensuring that both technical compliance and consumer experiences are reflected in performance assessment.

2.3. *Who should have what roles in developing and using such tools? What, if any, should be the roles of governments? How should the costs of adapting and implementing such tools on an ongoing basis be managed?*

These tools can be applied in two ways. First, as a globally validated tool, it can be tailored and implemented at scale. It could be funded and administered at either the national or jurisdictional level. At the national level, the survey could be led by a Commonwealth Government agency (e.g. ABS or DCCEEW) as a periodic national survey (e.g. every 2–3 years) or embedded within existing national surveys such as the General Social Survey or the Survey of Income and Housing. This would ensure consistent national data collection while leveraging existing statistical infrastructure. At the jurisdictional level, state-based regulators could incorporate water quality experience questions into existing customer satisfaction or perception surveys. For example, Victoria's Essential Services Commission Water Customer Perception Survey samples approximately 5,200 customers annually across 15 state-owned urban and regional water corporations and measures value for money, reputation, trust, and overall satisfaction (ESC, 2026). Regardless of the delivery model, a standardised set of questions and indicators would be required to enable meaningful comparison of drinking water quality experiences across jurisdictions.

Second, the tool is sufficiently flexible to be adapted to different contexts and project settings. In this case, implementation would need to be budgeted within individual projects as part of engagement, planning, and monitoring activities. The tool could be co-designed and co-delivered with communities before and after the interventions to inform project planning, evaluation, and ongoing improvement.

In both ways, a pilot phase could be designed and implemented in selected locations or projects, with meaningful stakeholder and community engagement, before the approach is scaled up.

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