Submission to Legislative Council Select Committee - TWT

The Secretary,

Legislative Council Select Committee TWT,

26 -8-2020

Parliament House,

Hobart 7000.

Dear Sir/Madam,

We wish to place the following submission with the Committee , along with a request to speak to the Committee to fully explain some points if that is possible .

Executive Summary;

- (a) TasWater has not met the obligation of fair dealing , normal business procedure , nor commercially competitive pricing .
- (b) The only fair basis of billing must be on a volume basis .
- (c) The need for a written basis of assessment for greasetraps that can be referred to by both customers and TasWater, and that it be developed in consultation with the industry.
- (d) That assessment should be based on oil content and volume.
- (e) The management of TasWater should be firmly with a Government Minister, and avoid any focus on pecuniary interest or that it is a totally independent body.
- (f) That attention should be paid to the need of an appeal process for those adversely affected by TasWater actions.

Thank you to the Committee members for their efforts,

Best Regards,

M .J . Eastley

26-8-2020

Tas. 7304

TASWATER

These comments follow eight meetings with TasWater over the last two years, including a period of co-operation between TW and the Deloraine community in attempting to develop a more workable tradewaste policy. There have been three Tradewaste Managers in that period, and three distinctly different billing methods. There are three Water Boards in the Greater Melbourne area, serving a population ten times that of Tasmania, that have very different policies to Tasmania. Both Melbourne and Tas. have policies endorsed by their respective Economic Regulators — and since both cannot be correct we have compared the policies in some detail.

Water:

Some people will question why water supplied by TW has risen from 42c/l to the current \$1.06 /l. Many years ago the Meander Valley Council offered ratepayers the option of providing a good quality water supply at 73c/l, and with CPI since then would have been about 85c/l. Since there is little chance of large variations in different localities – the cost of filtering and treatment will not vary much — the 20% extra we are paying really means that we are subsidizing those areas that only paid 42c for many years. Comparison with City West Water and TasW shows that the connection or administration charges are within \$10 of each other, but CWW charges much more due to needing to buy 33% of their water from a de-salination plant.

Domestic Sewage;

The significant difference here is that City West uses the volume delivered as the waste discharged multiplied by the cost /litre of the treatment costs , but TW uses a fixed sewage charge of \$632 per tenement , based on an assumption of 200 kl/annum . Australia wide the basis of past calculated average cost systems was a 3 person residence using 150kl/year , but at some point TW raised the charges by a considerable amount using the 200kl figure as the reason . This is highly irregular as the point of such average charges is to use the average volume used , and this would not be accepted by any reputable accountant .

As a typical pensioner couple we use a bit less than 100 kl/year , and in Melbourne would pay a total of \$340 , made up of a connection charge of \$256 and a treatment charge of \$85 as they charge 85c/kl .for treatment . As Tasmanians we pay \$632 , and with similar administration costs assumed we are effectively being charged \$3.76 instead of 85c/l for treatment . A family using the recognized average of 150kl/year is paying \$2.50 for treatment . These inflated treatment costs are used in the calculation of tradewastr charges and as the basis of the Equivalent Tenement calculations.

Tradewaste;

The only modelling used by TasWater was a report of doubtful relevance that showed domestic sewage as an acceptable 100mg oil content , with tradewaste at 1500mg at the outlet and remaining 400mg after the installation of a greasetrap , and hence a policy of compulsory grease traps and a treatment cost 4 times the already inflated domestic cost . The limited amount of work at Deloraine does not support these assumptions , and the policy at City West shows that food industry waste is very low risk and they cost tradewaste at twice not 4 times the domestic cost . This shows that TW has been charging more than double the treatment cost than was justified , and they have been aware of this all along.

TasWater measures tradewaste as 80% of the supply water meter reading , but in situations where toilets are provided for patrons they are adding sewage charges based on floor area or maximum seating capacity on top of that . The bill attached shows a business charged on the basis of

80% of the supplied volume as tradewaste and 90% of the volume also charged as sewage . This is a case of double dipping in an obvious manner , and TasWater has refused to change the bill as they say there are many others they would also have to change . They claim they have the permission of the Economic Regulator to charge using both methods , but whether this is misinterpretation by TW or an error by the Regulator is not clear . Obviously the total should add up to 100% of supply volume , and City West has the choice of 3 methods of obtaining the proper ratio of sewage and tradewaste in the volume ; by mutual consent , by calculation if no water meter is used , or by the most accurate of all which is by measurement . A sheet is provided showing a \$23 water meter that is easily inserted in either the supply lines to the toilets or the kitchen which gives an accurate guide to all usage in conjunction with the supply meter ie x + y = z.

There is clear evidence that TW has continued to provide misleading information to the Regulator in two key areas — the use of a multiple of 4 in the tradewaste calculations, and in the refusal to move from the equivalent tenement calculation to a volume basis by insisting that they cannot measure toilet waste in a 100mm pipe.

Attached is a bill from a small non-food business (joinery shop) that has a small granny flat attached, and has two toilets. Despite the usual tenement tariff being based on 200 kl/year and the connection using only 80 kl, TasWater has added an extra 10% as an equivalent tenement charge, thus taking the fixed sewage charge to \$724. This is \$400 more than the Melbourne charge which would be a \$256 connection charge plus \$68 treatment based on 85c/kl. The Tas. treatment charge works out at over \$5 per kl despite this being only sewage and no different to any household with an en-suite toilet, or a downstairs toilet. A volume based billing system avoids all these situations.

Letter from TasWater to Rebecca White --

Please bear in mind that TW has an obligation to Parliament to provide service that is fair , follows usual business practice , and must be commercially competitive with the tariffs when considering this letter that explains TW policy .

There is considerable doubt that TW meets these legal and regulatory requirements .

The \$60,000 available as 4 year loans means that any small business unlucky enough to have a difficult site will pay \$19,000 per year for 4 years — and are under pressure to do so to keep their businesses open .

The reference to forced installation of greasetraps to avoid competitive disadvantage is the most damaging of all — if one person can manage an easy site for \$5,000 how can it be reasonable to force another to spend \$60,000 on that basis? There are many businesses in rural areas and small towns that are lucky enough to not have to deal with these TW policies and not subject to such interference with costs. After much discussion TW has admitted that 3 out of the 15 connections in Deloraine, which is 20% of the total, did not produce enough grease to justify the need for a grease-trap, and that number should rise when others are properly assessed. Many businesses have simply walked away rather than even try to meet the requirements,

The worst example we have seen is a café at Railton that serves coffee and pies etc that are bought in from a bakery , the only cooking appliance in use being a sandwich maker for making toasties . Despite this it still falls under that (economic disadvantage) clause . A proper assessment process is an absolute necessity and should include a minimum volume before a trap is required , and a minimum oil content established . A photograph is included that shows a business that was required by TW Hobart to install a trap , cost \$25,000 , only to be told by TW Launceston at the time of final inspection that they did not need one .

Greasetrap policy;

TasWater took a lead from NSW where the policy reads " if you cook A MEAL and sell it you must have a greasetrap ", which is unreasonable in that it has no mention of either volume or oil content. The factors that TW should have considered include:

(a) If any number of people choose to not cook at home, where they do not need a trap, but instead eat at a café, club or pub then the net effect on the TW system is zero.

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- (b) Any risk of pipe blockage comes only from coagulating fats and not from cooking oils which are liquid at room temperature. Where cooking oils are captured in a vat, and where meat is cooked on a griddle plate there is no possibility of them causing problems.
- (c) Any waste from a commercial kitchen must first pass through a 2mm hole in the sink basket (10 to 12mm in a domestic sink), and it is clear that any blockages are most likely to be initiated by foreign objects put down toilets.
- (d) Since the additional cost to TW in dealing with elevated oil levels is only the cost of either adding water to dilute to the acceptable level or of extra time in the settling ponds, then a properly calculated non-compliance charge should have been used where the cost of a greasetrap cost more than the cost of treatment to TasWater.

Finance and Management:

The most obvious problem is that TW is installing infrastructure with a designed 50 or more year life span but using funding arrangements that are basically based on 10 year terms . Given that interest rates are so low that Governments can borrow at about one half% , which is lower than CPI , this is inappropriate and needs co-operation with TasCorp to change policy

The current \$20 mill. per year provided by Government should be regarded as helping TW over the hump in activity caused by the initial back-log of work they faced . This would be best done by TW concentrating on their workforce being adequate for their long term role and using a contract workforce , including private licenced plumbers , in the catch-up phase . Instead we see TW involved in an empire building exercise which will produce greater problems in the future . As an example of this it appears that TW now has a fleet of 600 vehicles , many more than retired by the Councils used in the (almost) same work .

TasWater has persisted in regarding themselves as an independent company, but there are several Ministers who have a role to play – the Ministers for Infrastructure, Water, Small Business, Treasurer, Economic Regulator all have a role to play. To be blunt, nothing gets done because each would prefer that some-one else did it. This current Select Committee Inquiry is the first time that a review of TW activity has been held, and given the obvious problems, we suggest that the Legislative Council adopt a policy of undertaking regular reviews of TW, and that they recommend that the Minister responsible for TasWater be clearly identified and accessible. The Stakeholders Committee management system has clearly not worked, mainly due to the pecuniary interest that is involved in it, and having an active and accessible Minister should be more appropriate in looking after the interests of rate-payers.

It should be noted that City West reviews the costing of supplied water annually , and this year the cost of water has risen due to 30% of the supply needing to be bought from the de-salination plant whilst sewage costs reduced slightly . This enables them to manage their loan costs for infrastructure separately and over appropriate time frames . In contrast TasWater uses a less sophisticated system of applying the expected % growth in expenditure to be applied to their tariffs , which means that tariffs continue to rise regardless of the actual costs involved .

This means that the tariffs have risen 15% over the last 3 years when it would have been more appropriate that the \$20 million per year injected by Government was used to fund the cost of infrastructure upgrades .

Dividend Policy;

Local Councils have come to depend on the dividends paid by TasWater , and it is clear that it is spent across the whole of their Municipalities . The Regulator has already banned cross financing , and should now consider whether this is still a form of that as only a section of ratepayers contribute to that dividend as rural properties and those in small towns with septic systems do not do so . In fact that dividend can only be regarded as coming either from borrowed money , from the \$20 mill supplied by the Government , or by one section of ratepayers – all of these being inappropriate.

Opportunities;

There are opportunities for TasWater to improve their performance which have not progressed because of the culture within TasWater and the lack of any other avenue.

There are proven opportunities for irrigation using partly treated waste water - a google of either Tamworth or Dubbo waste water shows the benefits to agriculture and to cutting treatment costs . As an example Meander Valley has a row of treatment plants surrounded by agricultural land and the result would be that the treatment plants existing capacity would cope with future growth.

The Meander Dam reached its effective capacity this year , with close to conflict of demand for town supply and farmers needs . There has been a suggestion that the effective storage capacity could be increased if any farmers were willing to take water into on farm storage during the winter months at say half price , thus better utilizing the scheme and increasing TasWater income. If an accessible Minister were available these issues could progress.

It is clear that TasWater policy on waste issues do not meet the obligation they have to provide a competitively priced service , and we strongly urge the Committee to recommend that a meeting be held with TasWater , a member of this Committee , representatives of the hospitality industry , the Minister , and the Economic Regulator , with a view to developing a waste policy that works . The template for a competitive policy is of course in the Melbourne policy . If the Committee cannot broker such a meeting then , considering the damage that has been done , then it is appropriate that the Committee place the issue with the A.C.C.C. for a ruling — that is, the use of 200kl is irregular , the multiple of 4 in the calculation was known to be false ,and the clear issue of double dipping involved has been continued for so long . It is clear that it is very likely that some small business will take that step at some point and it is unfair that it be them that has to do so . In similar vein it is appropriate that the Auditor General be asked to review the financial aspects of the TasWater business , especially with regard to comparisons with other Water Boards .

I thank the Committee for their efforts and would welcome the opportunity to expand on some of these issues in person if that is possible .



	Residence and Business total usage	540 kl / year
	TasWater 2.5 ET Sewage	\$1,144
	Tradewaste	\$932
***	Total	\$2,076
	Vic actual usage	
	Sewage 200 residential + 150 café @	85c \$297
	Tradewaste 150 kl @ \$1.73	\$259
	Agreement (connection) charge	\$328
-49	Total	\$884
	\$1,200 Difference	

TOTAL NEW CHARGES	\$740.05
	\$134.87
Variable Water Charge (46 kL @ \$1.062/kL) (01/07/19-31/07/19)	\$48.85
Variable Water Charge (81 kL @ \$1.062/kL) (07/05/19-30/06/19)	\$86.02
VARIABLE USAGE CHARGES	
Full Fixed Sewerage Charge x 2.5 ETs* (01/07/19-30/09/19) Trade Waste Category 2A (01/07/19-30/09/19)	\$286.06 \$233.38 \$605.18
FIXED OR SERVICE CHARGES Full Fixed Water Charge - 20mm (01/07/19-30/09/19)	\$85.74

Tax Invoice marcates recable supply

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\$583,48

\$1,323.53

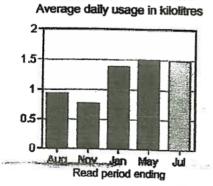
6/09/2019

Overdue amount payable immediately

Account summary

GST	\$0.00
Total Due	\$1,323.53
New Charges	\$740.05
Balance	\$583.48
Paid / Adjusted	-\$686.52
Last Account	\$1,270.00

Your usage



Current av. daily use: 1.49 kL/day Current av. daily cost: \$1.57/day

*1 equivalent tenement (ET) represents 1 residential dwelling.

If paying in person please keep account intact

raswater





Service Tasmania

3992 ---



Scan this QR Code to register for e-Notices or go to swater.formsport.com.au

Payment slip

Account no. 210041916

Overdue \$583.48

Total due \$1,323.53

6/09/2019

See over page for payment options

swater

ABN 47 162 220 653

Small Flat one extra toilet 80 kl/year only.

Comparison

Tas. 1.1 Equiv. Tenements

\$724

Vic. Network charge \$256 + \$68

\$324

Vic 85 c/l

Tas \$5.50 /l

Of the \$724 charged only \$68 is treatment.

FIXED	OR	SERVICE	CHAR	GES
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\$85.74 Full Fixed Water Charge - 20mm (01/01/20-31/03/20) Full Fixed Sewerage Charge x 1.1 ETs* (01/01/20-31/03/20) \$180.99

\$266.73

VARIABLE USAGE CHARGES

Variable Water Charge (22 kL @ \$1.062/kL) (31/10/19-31/01/20)

\$23.36

TOTAL NEW CHARGES

\$290.09

Notices or go to ter.formsport.com.au

WEBSITE www.taswater.com.au FOSTAL GPO BOX 1393 HOBART TAS 7001

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Account no.	210038795
Overdue	\$0.00
Total due	\$290.09
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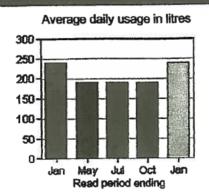
Total Due	\$290.09
New Charges	\$290.09
Balance	\$0.00
Paid / Adjusted	-\$284.78
Last Account	\$20 4. 70

e204 70

\$0.00

Your usage

GST



Current av. daily use: 240 L/day-Current av. daily cost: \$0.25/day

*1 equivalent tenement (ET) represents 1 residential dwelling.

If paying in person please keep account intact



444 3992 210038795 92

Service Tasmania

3992

Payment slip

210038795 Account no \$0.00 Overdue \$290.09 11/03/2020

See over page for payment options



Pensioner Couple Less than 100kl / year

Comparison

Tas Fixed Sewage Charge

\$632

Vic Network \$256 + \$85

\$341

Difference

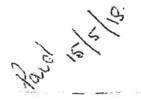
\$291

Vic 85 c/l Tas \$3.41

FIXED OR SERVICE CHARGES \$82.37 Full Fixed Water Charge - 20mm (01/04/18-30/06/18) \$158.06 Full Fixed Sewerage Charge (01/04/18-30/06/18) \$240.43 **VARIABLE USAGE CHARGES** \$22.44 Variable Water Charge (22 kL @ \$1.0202/kL) (06/02/18-26/04/18) **CONCESSIONS AND REMISSIONS** -\$47.00 State Government Concession^ **TOTAL NEW CHARGES** \$215.87

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Annualised Fixed Surge 8632



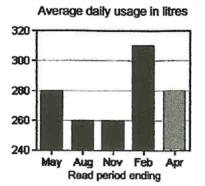
ALL ENOUIRIES & EMERGENCIES 13 6992 EMAIL enquiries@taswater.com.au WEBSITE www.taswater.com.au POSTAL GPO BOX 1393 HOBART TAS 7001

Tax Invoice *indicates taxable supply Account no. 210042103 Overdue \$0.00 Total due \$215.87 4/06/2018 Due date

Account summary

GST	\$0.00
Total Due	\$215.87
New Charges	\$215.87
Balance	\$0.00
Paid / Adjusted	-\$219.96
Last Account	\$219.96

Your usage



Current av. daily use: 280 L/day Current av. daily cost; \$0,28/day

*The concession on this account is being paid for by the State Government.

if paying in person please keep account intact







*444 3992 210042103 75



Scan this QR Code to register for e-Notices or go to rater.formsport.com.au

Payment slip

210042103 Account no. Overdue \$0.00 \$215.87 Total due 4/06/2018 Due date

See over page for payment options



19.5cm/7.68"





TW HPE ref: 20/41500

25 May 2020

Hon. Rebecca White MP Tasmanian Labor Leader Member for Lyons PO Box 493 Sorell TAS 7212

By email: penny.goodland@parliament.tas.gov.au

Dear Ms White

Coronavirus (COVID19) impacts - Trade Waste

Thank you for your email received on 19 May 2020 in relation to a consideration for extending timeframes for trade waste compliance, or adopting a moratorium for a period, given the financial stress and uncertainty of business resumption due to impacts of COVID19.

By way of background, TasWater has been taking steps since March 2016 to address trade waste compliance across the state and to bring Tasmania into line with the rest of the country. It is also important to note that;

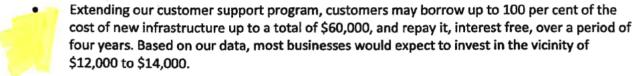
- The majority of our 3,677 commercial trade waste customers (about 77 percent) have already invested in the requisite trade waste infrastructure and have therefore achieved compliance
- The North West was the last region to have commercial trade waste compliance introduced, hence their compliance levels are less than the rest of the state at 63 percent. The South is at 82 percent and North at 79 percent
- Trade waste not only increases the risk of blockages and sewer overflows but also impacts on our treatment processes and the quality of treated waste water ultimately returned to the environment
- Some trade waste poses a significant health and safety risk to TasWater personnel

While this context is important, we acknowledge that several commercial trade waste customers, particularly those in regional areas, were looking for a customer-centric approach to compliance. There have also been suggestions that our requirement for some smaller businesses to install trade waste pre-treatment infrastructure or to upgrade existing infrastructure was a significant financial constraint.



As a direct result of this feedback we have modified our approach. These modifications include the following:

- Adopting a more customer-focused approach by working with individual businesses across the state – particularly those in the north-west – to minimise the impact of trade waste on TasWater infrastructure and on the environment
- Establishing a trade waste help-line with members of our trade waste team working collaboratively with business and property owners to identify solutions that are effective and affordable
- Better supporting customers with relevant information such as drawings and plans to make the process as simple and cost effective as possible for them
- Providing extended timeframes to install trade waste pre-treatment, in recognition of the limited availability of plumbers



We understand that COVID19 has caused significant impacts to our customers, we will continue to work them to gain a better understanding of the issues they face, to discuss the options available to them and to come up with tailored solutions as per their business circumstances.

As per my earlier response, we have introduced several measures to provide relief to the business community across the state. The details of these measures are available at https://www.taswater.com.au/documents/rotating-banner/taswaters-residential-and-business-support-during-covid-19.

For our trade waste customers who are experiencing financial difficulties we are able to consider:

- deferring trade waste repayment scheme payments for a period
- An extension on trade waste compliance related timelines; and
- Temporary suspension of trade waste charges while a business has stopped trading

We encourage trade waste customers needing assistance to contact us on tradewaste@taswater.com.au or (03) 6422 5444. Our team members can discuss and provide suitable options as per the customer's individual circumstances.

We remain firmly committed to meeting our legal, regulatory and environmental obligations, and are seeking to do so in a manner that is sympathetic to the challenges some of our customers face. We are also cognisant of the importance of recognising the fact that the majority of our commercial trade waste customers have already made the investment to meet their trade waste compliance requirements and should not be competitively disadvantaged.

If you have any further questions, please feel free to contact Ruth Dowty, Acting General Manager, Corporate & Community Relations on 0436 922 346 or at ruth.dowty@taswater.com.au.

Yours sincerely

Michael Brewster Chief Executive Officer cip to the main content

City West Water



Trade waste charges explained

Charges cover the cost of transporting, monitoring, administrating and treating liquid waste generated by commercial and industrial businesses.

They are levied to entities who have applied for, or who currently hold, a trade waste agreement or consent with City West Water.

Trade waste charges are separate to water and sewage usage and service charges that are also usually applicable for commercial and industrial properties.

Unless otherwise agreed the Occupier of the land, from which the trade waste is discharged, is the entity who is required to hold the trade waste agreement or consent. Exceptions apply for customers who hold a Trade Waste Owner's Consent*.

*See the Trade Waste Owner's Consent section of our Trade Waste customer charter (/documents/trade_waste_customer_charter.pdf) for more information.

What are City West Water's trade waste charges?

One-off application fee:

When a trade waste agreement is prepared (or renewed) the customer is charged a one-off fee to cover the cost of processing the Trade Waste Application.

More complex applications take more time to process and attract a higher charge.

A customer's complexity is determined by their risk rank.

Complexity	Risk to sewerage systemRisk Rank*		One-off application fee	
Most complex Extreme		1	\$2188.98	
	High	2	\$2188.98	
	Moderate	3	\$2188.98	
	Low	4	\$602.39	
	Minor	5	\$313.71	
Least comple	xMinor	5 (restaurants or other for	ood business only)\$79.19	

AND CHARGES NOTICE OF YARRA VALLEY WATER'S TARIFFS TEES

In accordance with Section 240 of the Weser Act 1989, Farra Valley Water Corporation them Walley Weser I has resolved that the following tantiffs, and four and charges must be water and sewerage respectively apply threach district of Yarra Valley Water for the financial year commencing on 1 July 2829. This resolution is consistent with the Essential Services Commission's 2018 Price Determination for Yarra Valley Water.

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Food Waste Charges Health care institutions

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> NOTICE OF CITY WEST WATER'S 2020-21 TARIFFS FEES AND CHARGES

Determination for City West Water In accordance with Secarce 255 of the Midgract 1885, City West Yuller has readined that the following tables has each charges relating to water supply and sewage disposal sespectively apply in each distinct supplied by City Mast Vertue for the finalistal year communicipy on 1 July 2020. This resolution is remained with the first potal Services Communications 20 85 Price

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Sewage disposal fee SEMESTED SEMES s per property per annum sper kL per propertyper annum per kL

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Monreadenday water tariff Residential recycled water tariff Sparkt.

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Non-rasidential trade-waste teriff Private the service connection fee

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1.7673

per kg 0.8440

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Alsk Bank's Commercial Food Bushness

Trade waste - food waste service

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rade waste ~ application fees

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Foodwaste service Standard May (NCC) \$ per lot \$ per lot Sper registered bed per annum S43850

NCC - Water connection
NCC - Sewer connection
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NCC - Besycled water connection
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Core tillscellaneous fees and charges

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City West Café Policy

For customers who discharge 10 or more kilolitres per day, trade waste volumes can be determined using one of the following methods:

- Applying a factor to the site's water meter
- Measuring the volume of trade waste with a flow measurement device (a mandatory requirement for customers who discharge more than 25 kilolitres/day)
- · Using an estimated amount that is agreed between CWW and the customer

Examples of trade waste charges being applied

Example 1: A take-away food shop will discharge 7kL of trade waste on average per day.

The trade waste from the site is the dirty water that is generated from the food preparation and wash-up areas.

One-off application fee

Justification

\$79.19

The customer is a restaurant or other food business. CWW's risk rank*

classifies the customer as a risk rank 5.

Annual agreement chargeJustification

\$328.89

Risk rank 5 agreement charge

Minimal complexity/risk

Although this site discharges more than 10kL of trade waste per day, it is a restaurant or other food business, which means this customer will not pay any **trade waste** volumetric or load based contaminant charges **on their trade waste account**.

Instead the applicable non-residential water and sewage account will cover the costs associated with the transport and treatment the site's trade waste.

Example 2: A new mechanics workshop will discharge 3kL of trade waste on average per day.

The trade waste is the dirty water that results from the cleaning of parts and washing of vehicles on site.

One-off application fee-Justification

\$313.71

The customer is not a restaurant or other food business.

CWW's risk rank* classifies the customer as a risk rank 5.

Annual agreement chargeJustification

\$328.89

Risk rank 5 agreement charge

Minimal complexity/risk

Because the site discharges less than 10kL of trade waste per day this customer will not pay any trade waste volumetric or load based contaminant charges on their trade waste account.

Instead the applicable non-residential water and sewage account will cover the costs associated with the transport and treatment the site's trade waste.

Example 3: An Industrial Laundry will discharge 18kL of trade waste per day.

The trade waste is the dirty water that gets discharged from the washing machines.

One-off

application fee

Justification

\$602.39

The customer is not a restaurant or other food business. CWW's risk rank* classifies the customer as a risk rank 4.

Agreement Charge:

The Trade Waste Agreement Charge is an annual charge (paid in either quarterly or monthly instalments) which cover the cost of administering and monitoring Trade Waste Agreements and Consents.

Higher risk customers pay a higher charge than low risk customers as they require an increased level of monitoring and administration.

Administrative effort by CWW	Risk Rank*	Annual agreement charge
High degree of monitoring and administration by CWW	1	\$19,046.57
.,	2	\$15,798.50
	3	\$7,931.62
	4	\$1,732.28
Low degree of monitoring and administration	5 (includes restaurants and other food business	\$328.89

Volumetric and quality charges:

Volumetric and quality charges cover both the transport of trade waste through the sewerage system and treatment of trade waste at the waste water treatment plant.

Customers who discharge less than 4 kilolitres per day of trade waste or operate a restaurant or other food business pay a fixed price per kilolitre.

These charges appear on the relevant water and sewage account as non-residential sewage.

Customer who discharge less than 10	Rate	Notes	
kilolitres per day	Nate		
	\$1.7295 per	Charged on the applicable water account as non-	
Volume charge	kilolitre	residential sewage	

Customers who discharge 4 or more kilolitres per day of trade waste and do not operate a restaurant or other food business receive charges that are based on the:

- · volume of trade waste discharged to sewer
- contaminant loads that are contained within the trade waste discharge

Customer who discharge more than 4 kilolitres per day	Rate	Notes
Volumetric charge	\$0.8260 per kilolitre	Trade waste volumetric charge
Biochemical Oxygen Demand (BOD)	\$ 1.0085 per kilogram	Contaminant load charge for BOD
Total Kjeldahl Nitrogen (TKN)		Contaminant load charge for TKN
Suspended Solids (SUS)	\$0.5463 per kilogran	Contaminant load charge for SUS
Inorganic Total Dissolved Solids (iTDS)	\$0.0196 per kilogran	Contaminants load charge for iTDS

How is the volume of trade waste determined?