**Summary of our submission on Sewerage**

**Overarching position**

- ClubsACT supports fair, evidence-based reform.
- ClubsACT does not support any reform that increases costs for community clubs.
- Any reform must be revenue-neutral for community clubs as a class.
- No individual club should face higher sewerage or liquid trade waste charges unless there is actual site-specific evidence of materially higher discharge strength or system cost.
- Clubs should be treated as community-serving not-for-profit venues, not as generic commercial or high-risk trade waste generators.

**8.1 Pricing principles**

- Support the principles of efficiency, transparency, simplicity, social considerations and gradual adjustment.
- Apply those principles in a way that expressly recognises not-for-profit community venues.
- Do not treat "revenue neutral overall" as a licence to shift cost burdens onto clubs.
- Require a strong evidence base before any redistribution of charges onto community clubs.
- Ensure tariff design reflects fairness, proportionality and community impact, not just engineering neatness.

**8.2 Current sewerage tariff structure**

- Acknowledge that the current fixture-based model is imperfect.
- Reject any immediate move from one blunt proxy to another blunt proxy.
- Recognise that high fixture counts in clubs often reflect member amenity, disability access, sporting use, event activity and long operating hours.
- Do not assume fixture numbers equate to higher-risk wastewater.
- Reform should be based on actual discharge characteristics, not simplistic venue assumptions.

**8.3 Residential tariffs and the double-hit issue**

- ClubsACT is not seeking to shift costs onto households.
- But the Commission should not protect residential outcomes by increasing charges on clubs.
- Club members are often the same Canberra households already paying residential sewerage charges at home.
- If club costs rise, households are effectively hit twice: once directly at home and again indirectly through higher costs on the venues they fund and use.
- The final report should explicitly address this equity issue.

### 8.4 A fair proxy for clubs

- The best proxy is not a single metric.
- The ACT should adopt a classification-based approach combining:
  - activity type
  - pre-treatment status
  - indicative water use
  - site-specific evidence where needed
- Clubs should be differentiated between:
  - no-cook or minimal-food operations
  - standard managed kitchen operations
  - genuinely higher-intensity food production
- Reject generic assumptions based only on venue type, liquor licence, patron numbers, floor area or fixture count.
- A club-specific low-impact subclass is the fairest and most accurate model.

### 8.5 Liquid trade waste charging

- ClubsACT does not support a separate liquid trade waste tariff for community clubs on the current evidence.
- The ACT has not yet assembled enough data to distinguish ordinary club operations from genuinely higher-risk trade waste activity with sufficient precision.
- Any reform in this area must be revenue-neutral for community clubs as a class.
- No club should face an increase unless site-specific evidence shows materially higher discharge strength or system cost not already addressed by existing pre-treatment and compliance obligations.
- If a liquid trade waste framework is pursued, the starting point should be a low-impact community club subclass with no separate charge unless evidence justifies a different outcome.

### 8.6 Safeguards if a liquid trade waste tariff is considered

- No club should be classified for a separate tariff purely because it is a club, serves liquor, or has a high fixture count.
- A default low-impact community club subclass should apply where food activity is modest or hot-food operations are already managed through compliant pre-treatment.
- Existing environmental investment should count in the club's favour, including:
  - grease traps
  - strainers
  - pump-out obligations
  - maintenance records
- Any move to site-specific charging should require measured or credibly modelled evidence on discharge volume and strength.

- Clubs should have a right of review if classified into a higher charging category.
- Any implementation should include:
    - shadow billing before charges take effect
    - a hard cap on year-one and year-two increases
    - at least a two-year transition period
- No final implementation should occur before the 1 July 2028 regulatory period, and any club-specific changes should be staged after that date.

**Consultation and transition points**

- Publish any proposed club classification criteria before the draft decision stage.
- Consult directly with ClubsACT and affected venues on proxy design, data collection and sampling methodology.
- Use shadow billing so venues can see likely impacts in advance.
- Allow grandfathering, rebates or offsets where clubs have already invested in compliant pre-treatment.
- Review any new model after 12 months to correct misclassification and unintended consequences.
- Do not compress the current timetable; use the available period to get the evidence base right.

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