

Community Wastewater Management Scheme Charge 2026/27

Submissions Summary Report

June 2026

Contents

Introduction	2
CWMS Written Submissions – Summary and Responses.....	3
CWMS “Your Say” Submissions – Summary and Responses	23
Appendix 1 – Notification of the Public Consultation	38
Communication	38
Response rate	39
Appendix 2 – Media Release	40
Appendix 3 – Fact Sheet.....	43
Appendix 4 – Submissions	50

Introduction

Last year, as part of the consultation on its Annual Business Plan & Budget and Long Term Financial Plan, Council proposed changes to the financing of Council's Community Wastewater Management Systems (CWMS) schemes and the associated Annual Service Fee and capital contributions required for future works based on the pricing principles recommended by the Essential Services Commission of SA (ESCOSA).

Following feedback received through the consultation process, the proposed changes were not introduced in 2025/26, with Council resolving to review the CWMS Annual Service Fee for 2026/27 and an annual capital charge based on an annuity cost for each scheme as a large number of schemes are entering mid-life and require material amounts of capital expenditure to be undertaken across the next 10 years.

Modelling has now been undertaken to incorporate a capital renewal annuity cost into the 2026/27 CWMS Annual Service Fee to fund the future capital renewal requirements of each individual scheme.

The proposed new model has been developed with the objective of complying with the Essential Services Commission of South Australia's pricing principles to achieve full cost recovery of operating expenses and raise sufficient funds for future capital expenditure to ensure the schemes are financially sustainable in the long-term.

Due to the combination of now recovering all operating costs and also calculating a capital charge, the modelling has indicated that the majority of the schemes would incur a significant annual fee increase. Some of the calculated amounts being materially high due to some schemes having large capital expenditure amounts in either the first year, or several early years.

As a result, Council has considered the potential financial impact on property owners of the proposed changes, and is proposing that any increase to the CWMS Annual Service Fee will be phased in over five (5) years, with any annual increase to be capped at \$250. Where a material deficit balance exists and is forecasted to exist for several years, an additional capital contribution could also be levied.

Privacy

Please note that only the name and location of each submitter is detailed in the report. All personal details in the original submission contained in the appendices are redacted to maintain privacy.

Any commentary that is considered defamatory or inappropriate have been redacted.

CWMS Written Submissions – Summary and Responses

It should be noted that the Response and Action columns are draft recommendations presented to Council as part of the decision-making process. Consequently, Council may resolve to accept them with or without amendments in the final document.

Andrew Bower, Bowhill

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
1.1	NA	Fix all the meters that 'don't work', levy the excess water as appropriate, then leave the standard charges as they are currently.	Fix all the meters that 'don't work', levy the excess water as appropriate, then leave the standard charges as they are currently.	CWMS not currently charged by meters and there is no intent to do so. Confusing the consultation with Bowhill Water Supply.	Tabled in Council Report

Sean Edwards, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
2.1	NA	I write to formally oppose the proposed CWMS Annual Service Fee increases outlined in the Consultation – CWMS Annual Business Plan 2026/27 – Fact Sheet. While I acknowledge Council's obligation to comply with ESCOSA pricing principles and relevant provisions of the Local Government Act 1999 and associated regulations, the scale, timing and structure of	1. Reject the proposed increases in their current form. 2. Align future increases more closely with CPI or household income growth. 3. Absorb a portion of historical shortfalls within Council's broader financial framework. 4. Defer major structural pricing changes until after the 2026 Council elections.	The CWMS is only provided to a small number of properties (approximately 17%) and this would be unfair for properties that are not provided the same service, as the general rate payer would be subsidising this service. ESCOSA pricing principles requires that a user pays pricing exists for utility services. Previous CWMS Annual Service charge for Pelican Point has had no fee component for the	Tabled in Council Report

		the proposed increase are demonstrably unfair, economically excessive, and poorly aligned with the current cost-of-living environment faced by ratepayers.		future renewal of the scheme's assets for the past 20 years.	
--	--	--	--	--	--

Noel Edge, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
3.1	NA	Please take note, I reject any suggestion of a justified price increase to provide sted services. Council has requested consultation / feedback, this is my submission, please retain the annual charge at the present level.	Retain the annual charge at the present level.	Noted	Tabled in Council Report.

Kelly Rowlands, Five Miles/Kia Marina

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
4.1	NA	How the property units are calculated The LGA Property Units Code applies user-pays principles: premises generating higher waste loads are charged at	1. Re-assess the classification and unit treatment of Kia Marina and the commercial slipway under the relevant	1.LGA unit code doesn't specifically cover either marina berths or slipways, general commercial premises are covered which calculates the unit level as the number of Full Time Equivalents (not living on	Tabled in Council Report.

		correspondingly higher unit multiples. On Council's listing, the scheme's 13 units comprise 11 residential properties (one unit each), Kia Marina and the commercial slipway — with both commercial premises treated as a single residential-equivalent unit each.	Code clauses, and confirm the basis; 2. If the review finds the classification of Kia Marina was not correct, consider adjusting the historic shortfall so existing members are not unduly impacted by a deficit that arose largely from a Council decision;	site the site) / 6 = number of Property Units. 2. Legal advice would need to be obtained if there are alternative methods to calculate the property units of Kia Marina and the commercial slipway. Post legal advice, consideration to be given on the historical deficit impact.	Seek legal advice if there are alternative methods to calculate the property units of Kia Marina and the commercial slipway
4.2	NA	The annuity recovers future capital over too short a period Council has disclosed the build-up of the proposed charge and the annuity calculation, which I appreciate. I understand that pre-funding renewals through an annuity is itself consistent with an NWI/ESCOSA approach. My concern is the period over which it is being recovered.	Reconsider the annuity recovery period in favour of an asset-life-aligned horizon;	Previous CWMS Annual Service charge for 5 Mile / Kia Marina has had no fee component for the future renewal of the scheme's assets for the past 21 years. Recalculating the annuity recovery period in favour of an asset-life-aligned horizon would then cause a large number of schemes into a deficit scheme balance. No suggestion has been provided how this deficit would be financed (interest charged to the scheme and/or financed by General Funds ?).	Tabled in Council Report.
4.3	NA	Renewal vs increased capacity — information not received My 19 May 2026 submission requested the design basis and capacity assessment for	Provide the 2031/32 design/capacity assessment, allocating any growth-related cost to the demand driver — and, failing that, record that	An engineer is presently preparing a Capacity Report. Present figures in the CWMS AMP are indicative. Future CWMS capital expenditure projections will include indicative	Infrastructure and Field Services to provide results of the engineers Capacity Report. CWMS AMP capital expenditure

		the significant 2031/32 works (pump sump, 57,000-litre IAT tank, 22,000-litre balance tank, trafficable lids). This has not been provided as at the date of this submission and this submission is therefore made without the ability to review it, and I reserve the right to comment further once it is available.	affected ratepayers were not given sufficient information to fully assess the increase.	developers contributions (to enable to calculate the net cost to existing connections).	projections to include indicative developers contributions (to enable to calculate the net cost to existing connections).
4.4	NA	Adjusting the shortfall so existing members are not unduly impacted My central concern is that existing members are being asked to make good — through an accelerated annuity — a shortfall that arose largely from a Council decision benefiting a commercial operator.		As mentioned above, legal advice would need to be obtained if there are alternative methods to calculate the property units of Kia Marina and the commercial slipway. Post legal advice, consideration to be given on the historical deficit impact.	Post legal advice, Council to give consideration to the previous decision of Council and the historical deficit impact.
4.5		Supplementary Submission Further to my formal submission of 31 May 2026, I am writing to add to Point 3, regarding whether the 2031/32 capital works are renewals or additional capacity. On Council's own confirmation, a growth-related capacity cost — driven by a prospective	The charge as calculated does not appear to be in line with those principles. I ask that Council review the charge.	Public consultation calculations included capital expenditure that increased capacity due to either pending or approved additional connections, this overstated the capital contribution. As mentioned above, future CWMS capital expenditure projections will include indicative developers contributions (to enable to calculate the net cost to existing connections).	CWMS AMP capital expenditure projections to include indicative developers contributions (to enable to calculate the net cost to existing connections). Recalculation of CWMS fees to recognise the new

		development, and one the developer is expected to contribute toward — is being recovered from the scheme's existing ratepayers through the current charge.			cost to existing connections.
--	--	--	--	--	-------------------------------

Kellie Carman, David & Nola Sadler, Marco & Michelle Alfonso, Five Miles

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
5.1	NA	We write to formally oppose the proposed changes to the CWMS charging methodology currently under consultation. Five Miles ratepayers are already paying the highest Annual Service Charge across all CWMS schemes.	3.		Tabled in Council Report.
5.2	NA	It is my understanding that the Five Miles scheme consists of 13 connections, of which two are commercial enterprises. If this is correct, I question why commercial operations are contributing under the same residential charging structure as ordinary residential ratepayers.	1. Are commercial premises within Five Miles currently charged under a differentiated commercial structure? 2. If not, why not? 3. Has Council assessed whether a commercial contribution model should apply?	Only one commercial connection is charged at the rate of one (1) unit. The LGA unit code doesn't specifically cover either marina berths or slipways, general commercial premises are covered which calculates the unit level as the number of Full Time Equivalents (not living on site the site) / 6 = number of Property Units.	Tabled in Council Report.
5.3	NA	Some residents have recently become aware of an apparent accumulated deficit	I therefore request Council provide:	CWS Scheme balances are published in the Annual Business Plan.	Council to provide recent financial

		said to be in the vicinity of \$40,000 - \$50,000 associated with Five Miles. This raises significant concerns. To my knowledge, residents have never been formally advised that this deficit existed, when it arose or why it arose. If ratepayers are now expected to absorb substantial fee increases due to historic deficits, there must be full transparency regarding how and why those deficits occurred.	1. The current accumulated surplus/deficit position for Five Miles; - Historical annual financial statements relating to the maintenance costs and material expenditure specific to the Five Miles scheme;	Council to provide recent financial statements relating to the deficit.	statements relating to the deficit
5.4	NA	Given the widespread impacts of the 2022 River Murray flood event, I seek clarification regarding whether any component of the Five Miles financial position or expenditure relates to flood-related works. Ratepayers should not be expected to retrospectively fund disaster-related costs if external funding avenues were available.	Five Miles financial position or expenditure relates to flood-related works. Specifically: 1. Did the Five Miles CWMS incur flood-related damage, emergency works or recovery expenditure? 2. If so, what proportion of expenditure was directly attributable to flood impacts? 3. Was an insurance claim lodged? And If not, why not? 4. Was funding sought through State or Federal disaster recovery programs or	Detail of expenditure categorised as flood damage to be supplied and also subsequent recoupments (insurance and disaster recovery).	Detail of Flood related expenditure/ recoupments to be supplied

			Local Government recovery grants? 5. If applications were made, what were the outcomes? 6. If no applications were made, why not?		
5.5	NA	Council has indicated that ageing infrastructure and future capital requirements are contributing to rising costs. However, no specific information appears to have been provided regarding Five Miles itself in relation to the actual age of the existing infrastructure and its maintenance costs, only future estimated material expenditure.	Council to provide: 1. Annual maintenance costs specific to Five Miles over the previous ten years; 2. Scheduled maintenance expenditure; 3. Unscheduled maintenance expenditure; 4. Upgrade costs incurred; 5. Consultant costs; and 6. Internal administration or overhead allocations charged against the scheme. Council has referenced future upgrade requirements and expenditure in their Rolling Capital Works Program, including implementation of remote systems and monitoring technology. Can you provide clarity regarding the following:	As advised above, Council to provide recent financial statements relating to the deficit and associated information. Information to be provided by Infrastructure and Field Services	Council to provide recent financial statements relating to the deficit. Infrastructure and Field Services to provide information in relation to remote systems and monitoring technology.

			1. Is installation of the proposed remote system genuinely necessary? 2. Is it driven by operational need or convenience? 3. Will implementation reduce future maintenance costs? 4. Are any measurable savings expected? 5. If so, over what timeframe will residents see those savings?		
--	--	--	---	--	--

Darryl & Philippa Heath, Five Miles

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
6.1	NA	The proposed increase for our scheme is too steep and falls unfairly on a small number of households. Before finalising the charge and the Long Term Financial Plan, I ask Council to address the following: 1. Charge the marina and slipway fairly. 2. Slow the recovery down.		Only one commercial connection is charged at the rate of one (1) unit. The LGA unit code doesn't specifically cover either marina berths or slipways, general commercial premises are covered which calculates the unit level as the number of Full Time Equivalents (not living on site the site) / 6 = number of Property Units.	Seek legal advice if there are alternative methods to calculate the property units of Kia Marina and the commercial slipway

		3. Don't make us pay for an old deficit. 4. The 2031/32 works should reflect existing capacity.		Legal advice would need to be obtained if there are alternative methods to calculate the property units of Kia Marina and the commercial slipway. Post legal advice, consideration to be given on the historical deficit impact. Future CWMS capital expenditure projections will include indicative developers contributions (to enable to calculate the net cost to existing connections).	
--	--	---	--	--	--

Wayne and Sharyn Lawless, Five Miles/Kia Marina

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
7.1	NA	The marina and slipway look under-charged — and we make up the difference	Council to check whether the marina and slipway have been classified correctly.	Only one commercial connection is charged at the rate of one (1) unit. The LGA unit code doesn't specifically cover either marina berths or slipways, general commercial premises are covered which calculates the unit level as the number of Full Time Equivalents (not	Seek legal advice if there are alternative methods to calculate the property units of Kia Marina and the commercial slipway

				living on site the site) / 6 = number of Property Units. Legal advice would need to be obtained if there are alternative methods to calculate the property units of Kia Marina and the commercial slipway.	
7.2	NA	Two development applications on the slipway property	Any system upgrade needed for those new homes should be paid for by the developer, not by us.	Future CWMS capital expenditure projections will include indicative developers contributions (to enable to calculate the net cost to existing connections).	CWMS AMP capital expenditure projections to include indicative developers contributions (to enable to calculate the net cost to existing connections). Recalculation of CWMS fees to recognise the new cost to existing connections.
7.3	NA	The renewal cost is being collected over too short a period	A longer recovery period would smooth the impact.	Previous CWMS Annual Service charge for 5 Mile / Kia Marina has had no fee component for the future renewal of the scheme's assets for the past 21 years. Recalculating the annuity recovery period in favour of an asset-life-aligned horizon would then cause a large number of schemes into a deficit scheme balance. No suggestion has been provided how this deficit	Tabled in Council Report

				would be financed (interest charged to the scheme and/or financed by General Funds ?).	
7.4	NA	We haven't been given the detail behind the big 2031/32 works	Release the design detail for the 2031/32 works, and charge any growth-related cost to whoever drives that growth.	An engineer is presently preparing a Capacity Report. Present figures in the CWMS AMP are indicative. Future CWMS capital expenditure projections will include indicative developers contributions (to enable to calculate the net cost to existing connections).	Infrastructure and Field Services to provide results of the engineers Capacity Report. CWMS AMP capital expenditure projections to include indicative developers contributions (to enable to calculate the net cost to existing connections).

Scotts Creek Incorporated, Pelican Point

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
8.1	NA	Scotts Creek Incorporated, representing 100 leaseholders, formally opposes the proposed CWMS Annual Service Fee increases outlined in the CWMS Annual Business Plan 2026/27 – Fact Sheet. While we recognise Council's obligations under ESCOSA and the Local Government Act 1999, the proposed	1. Approval of capital works Any proposed or future capital works to our CWMS must be subject to prior approval by our association before acceptance or tendering.	1. Council document in the CWMS Asset Management Plan the proposed future capital expenditure, the Council also places out for public consultation each time the CWMS Asset Management Plan is reviewed. The Association is able to communicate to Council during or outside	Tabled in Council Report.

		pricing structure is viewed as unnecessary, inequitable, and poorly timed, particularly given current cost-of-living pressures.	2. Right to independent review Scotts Creek Incorporated reserves the right to obtain independent assessments and alternative quotations for any capital works. Cost allocation fairness 3. Our members will not accept responsibility for capital expenditure relating to infrastructure outside the Scotts Creek locality.	these periods of public consultation regarding any concerns of capital expenditure. 2. The Council is willing to include any contractors the association would like to nominate to be put into the invitation to quote or tender for capital works. The process that has been outlined would not be consistent with the Council's procurement process and would not be deemed appropriate. Inviting a new supplier to submit a quotation after a public tender has officially closed would normally be treated as a severe breach of procurement integrity. 3. The Council does not attribute sections or individual assets to certain connections within the same scheme.	
--	--	---	--	---	--

8.2	NA	Objections to Proposed Pricing Methodology • Disproportionate increase relative to CPI • Retrospective cost recovery • Council financial accountability • Current Financial Status of Scotts Creek	Requested Outcomes 1. Stop the proposed increases in their current form. 2. Align future increases with CPI or household income growth. 3. Align future increases based on the anticipated 10 year capital expenditure (As outlined in Mid Murray Council's 10 year Capital Expenditure Plan)	1. Noted 2. As per ESCOSA's pricing principles and Section 155(5) of the Local Government Act 1999, the Council is required to recover an amount by way of an annual service charge the cost to the council of establishing, operating, maintaining, improving and replacing (including by future capital works) the service. Historically, the practice was not to recovering a capital component fee for the future replacement of capital renewal, for some schemes this has not occurred for a period of 20 to 25 years. 3. The proposal is to recover future asset replacement costs by calculating an annual annuity capital component based on the CWMS Asset Management Plan next 10 years capital expenditure, being 2026/27- 2035/36.	Tabled in Council Report.
-----	----	--	---	---	----------------------------------

			4. Absorb a portion of historical funding shortfalls within Council's broader financial framework. Transparency Requirement 1. We request that all capital contributions be clearly identified as a separate general ledger line item within CWMS financial reports and balance sheets. 2. We would also support the re-establishment of the MMC CWMS committee with representatives from each association as this format enabled a proactive, effective and responsive approach to the management of the CWMS system.	4. Refer to (2) Council also support the user pays principle being the recovery of the costs of a defined service should be recovered wholly from the properties that benefit from the service. Absorbing any shortfalls would mean that the general rate payer is subsidising the service. 1. The Council will in the future disclosure capital expenditure in the Summary report of the CWMS schemes. 2. Under Section 41 of the Local Government Act 1999 (SA), Councils have the discretionary power to establish committees to assist with their functions, such as infrastructure, planning, or community services. After a general election, the Mid Murray Council will review the adequacy of existing committee structures, terms of reference, and membership to align with the new council's strategic direction.	Tabled in Council Report. Update CWMS Summary Report to disclose in the future Capital expenditure.
--	--	--	---	--	---

Purnong, Caurnamont & Districts Progress Association, Caurnamont

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
9.1	NA	The rate calculation for the Caurnamont CWMS is complicated by the current situation: 1. The advent of the extra connections, the upgrade work associated with adding these connections and the funding require to undertake this 2. The current design and plan to undertake a major system upgrade to the existing system, this includes future proofing. 3. Low funding balance in the Caurnamont CWMS account. The Association would like to propose the following: 1. Ensure that there is only one upgrade plan that covers the new connection and the existing system upgrade. (this will require a formal agreement from the land owners undertaking the sub division)		Noted For consideration, once applications are received for the proposed sub-divisions.	Tabled in Council Report.

		2. Planning and estimates are undertaken to determine the total cost, the cost for the new connections and the cost of the upgrade. 3. Explore the rates and additional funding required to fund the total project, the Association understand that existing residence may need to pay additional costs outside of the Annuity depreciation model.		For consideration, once applications are received for the proposed subdivisions. Council as in the past will consider the availability for the repayment of capital contributions over a 10 year period (with appropriate financing charge included)	
--	--	--	--	--	--

Brenda Park Leaseholders Inc, Brenda Park/Morphett Flatt

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
10.1	NA	Any proposed or future capital works must be approved by our association before they are accepted and before tenders are issued. • Our association reserves the right to seek alternate assessments and quotations for capital works.	Disagrees with intent of charge.	. Council document in the CWMS Asset Management Plan the proposed future capital expenditure, the Council also places out for public consultation each time the CWMS Asset Management Plan is reviewed. The Association is able to communicate to Council during or outside these periods of public consultation regarding any	Tabled in Council Report.

		• Our association and its ratepayers contributing to the CWMS will not incur capital cost expenditure that relates to the Morphett Flat side of this system. The Morphett Flat ratepayers piping infrastructure covers a long distance per connection and any capital works on the Morphett Flat side will be at a higher rate per connection than those allotments within Brenda Park. Brenda Park		concerns of capital expenditure. The Council is willing to include any contractors the association would like to nominate to be put into the invitation to quote or tender for capital works. The process that has been outlined would not be consistent with the Councils procurement process and would not be deemed appropriate. Inviting a new supplier to submit a quotation after a public tender has officially closed would normally be treated as a severe breach of procurement integrity The Council does not attribute sections or individual assets to certain connections within the same scheme.	
--	--	---	--	--	--

		rate payers should not be further subsidising the disproportionate costs associated with Morphett Flat side. • Our proposed annual charge for 2026/2027 has risen by \$250 from \$462 to \$712. It is our understanding that this \$250 increase is for future capital requirements, raising an additional \$33,250 per annum. We are in support of this increase as a once-off-only increase without further increase in subsequent 5 years. #Note: We also wish to see the capital contribution appear as a separate GL line/column on the CWMS financial report/balance sheet.		The Council will in the future disclosure capital expenditure in the Summary report of the CWMS schemes.	Update CWMS Summary Report to disclose in the future Capital expenditure
--	--	---	--	---	---

Stephen and Heather Nicolson, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
11.1	NA	Just a small complaint. It is a bit hard to reply to this public consultation when the site is supposed to be open till 11.59pm today, at now at 1.55pm, the site is closed!!!!		Consultation closed at 12.00 PM (noon) and not 12.00 AM (midnight) so a submission at 1.55 PM was after the closing time.	As the report was not closed, submission accepted out of time.
11.2	NA	We would just like to query the way that the 10 year proposed spends are worked out. Scott's Creek has in excess of \$60k in the account, with a proposed spend of \$70K for the \$10 years, yet the proposed rise in cost for this year is just shy of \$300. There are numerous other sites that have far larger spends, but their base costs are far less and their proposed increases are sometimes as little as \$100, along with a smaller pool in the funds. We can provide examples if you require. Also, in year 3, there are proposed replacements of 2 blowers at \$5500 each. They may be time expired, but will be still serviceable. – why noy 1 blower and keep the	We believe this has been ill thought out and needs to be revisited, with more public input.	Calculation of the Scotts Creek CWMS to be supplied. This is the second year that the Council has proposed a new costing methodology, Council delayed the decision in 2024/25 to ensure that greater consultation could occur in 2025/26. Noted	Send calculation of the Scotts Creek CWMS fee for 2026/27. Infrastructure and Field Services to consider and respond.

		other as a spare?? Our personal pump chamber pump is in excess of 25 years old and still operational. There must be a better system where a blower can be shared across several CWMS sites to avoid these exorbitant, extravagant and unnecessary costs.			
--	--	---	--	--	--

CWMS “Your Say” Submissions – Summary and Responses

The following questions were asked:

- Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?
- If you do not support the proposed methodology changes, please provide feedback on why?
- Do you support the proposed increase of the annual charge for your scheme?
- If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?
- Please provide any other comments on the proposal?

Tim Wachtel, Mark's Landing

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
1.1	Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?	Yes			Tabled in Council Report.

1.2	If you do not support the proposed methodology changes, please provide feedback on why?				
1.3	Do you support the proposed increase of the annual charge for your scheme?	Yes			
1.4	If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?				
1.5	Please provide any other comments on the proposal?	I fully understand that connected CWMS users must pay, as required, for maintenance, upkeep and programmed replacement to maintain a reliable fully functional system throughout the lifetime of the system. That said, it is critically essential that MMC establishes a lowest			

		cost supplier base for all the components required in a CWMS. Connected CWMS users are at the mercy of MMC and the prices paid for these components.			
--	--	--	--	--	--

Mark Olson, President, South Punyelroo Progress Association Committee

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
2.1	Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?	No			Tabled in Council Report.
2.2	If you do not support the proposed methodology changes, please	The South Punyelroo Progress Association Committee does not support the methodology to the	After some investigation and attempts to gain further information on the rationale behind the timelines for the		Infrastructure and Field Services to contact and respond.

	provide feedback on why?	calculation of the annual CWMS charge	requirement of repairs and major replacement, we have not been able to gain the required information from the Mid Murray Council.		
2.3	Do you support the proposed increase of the annual charge for your scheme?	No			
2.4	If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?	The timeline alongside the lack of essential information makes it impossible for the SPPAi committee to seek feedback from our 100 members as without the required information and short timeline we are unable to undertake our own costings/valuations.			Infrastructure and Field Services to contact and respond.
2.5	Please provide any other comments on the proposal?	The SPPAi committee understands that the CWMS is an essential system that will need ongoing maintenance and repairs which will come with cost. The SPPAi committee are simply trying to establish what/how the rationale is/was behind the costings			Infrastructure and Field Services to contact and respond.

		and projected repair/replacement projections into the future before we could possibly circulate our considered opinion to our 100 site holders for their support or otherwise.			
--	--	--	--	--	--

Anonymous, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
3.1	Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?	No			Tabled in Council Report.
3.2	If you do not support the proposed methodology changes, please	\$595 x 70 shacks =\$ 41650 per year i cant see where the maintenance of our		In benchmarking the CWMS annual service fee to the current SA Water sewerage charge,	

	provide feedback on why?	water treatment system can cost this amount		Council is charging approximately \$159 less per connection on average. With 28 schemes, each averaging 65 connections (SA Water averaging 13,250 connections)	
3.3	Do you support the proposed increase of the annual charge for your scheme?	No			
3.4	If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?	when the system require ac capital upgrade our association president should be notified with a detailed estimate so as to be transparent		Council document in the CWMS Asset Management Plan the proposed future capital expenditure, the Council also places out for public consultation each time the CWMS Asset Management Plan is reviewed. The Association is able to communicate to Council during or outside these periods of public consultation regarding any concerns of capital expenditure.	
3.5	Please provide any other comments on the proposal?	i am sick of seeing government organisations being ripped off blind			

		because it is not there money			
--	--	-------------------------------	--	--	--

Martin Ayles, Brenda Park

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
4.1	Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?	No			Tabled in Council Report.
4.2	If you do not support the proposed methodology changes, please provide feedback on why?	As dictated at upcoming meeting - Extreme costs			
4.3	Do you support the proposed increase of the annual charge for your scheme?				

4.4	If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?				
4.5	Please provide any other comments on the proposal?	Dictated at Meeting			

Ian Brown, Pelican Point

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
5.1	Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?	No			Tabled in Council Report.
5.2	If you do not support the proposed	We do not support any increase due to the existing rates			

	methodology changes, please provide feedback on why?	being charged seems exorbitant for the services we receive, ie no individual bin collection or recycling option, no sealed road, lack of maintenance to the road, no street lighting etc.			
5.3	Do you support the proposed increase of the annual charge for your scheme?	No			
5.4	If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?	I would have thought any increased cost in maintaining the steds system would come from what we already pay.			
5.5	Please provide any other comments on the proposal?	We do not support any increase due to the existing rates being charged seems exorbitant for the services we receive, ie no individual bin collection or recycling option, no sealed road, lack of			

		maintenance to the road, no street lighting etc. I would have thought any increased cost in maintaining the steds system would come from what we already pay. When system was installed the Council agreed to seal the dirt road from Murraylands Rd to the holding tanks, this never happened & now our association have told us that the council have lost all correspondence on this matter, other shack areas local to us have sealed roads. It would be good to see an actual breakdown of the costs of maintenance of the system to ensure what we pay is actually being used & not just supporting other council projects. Just because we own a holiday home doesn't mean we are			
--	--	---	--	--	--

		cash up & can keep up with large increases. Inflation is around 5%, how do you justify a 40% increase?			
--	--	--	--	--	--

Alex Nikolic, Cowirra

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
6.1	Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?	No			Tabled in Council Report.
6.2	If you do not support the proposed methodology changes, please provide feedback on why?	\$719 a year for 55 property units in Cowirra comes to \$39,545.00 a year and \$395,450.00 over 10 years for a capital expenditure over 10 years being \$46,218.00. That calculation does NOT include yearly increases to the rate! The proposal talks about fees being based on operational costs and annual			

		depreciation expense. Annual depreciation costs are unfair and not valid!			
6.3	Do you support the proposed increase of the annual charge for your scheme?	No			
6.4	If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?	As stated we have already or are paying over a thousand dollars extra on our rates to cover the installation of the scheme. It was heavily subsidised by government grants. We need projected service costs, all residents connected and then come to an acceptable cost!			
6.5	Please provide any other comments on the proposal?				

Peter McIntyre, Bowhill

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
7.1	Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?	No			Tabled in Council Report.
7.2	If you do not support the proposed methodology changes, please provide feedback on why?	Unaffordable for ratepayers			
7.3	Do you support the proposed increase of the annual charge for your scheme?	No			
7.4	If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?	Council savings			

7.5	Please provide any other comments on the proposal?				
-----	--	--	--	--	--

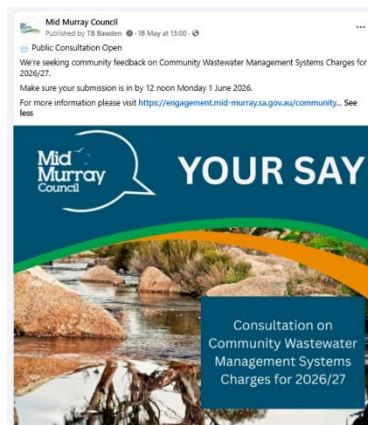
Appendix 1 – Notification of the Public Consultation

Communication

The Council promoted the engagement through Community meetings, Facebook, Council Website, Newspaper Advertisements, direct mail out to CWMS residents with the quarterly Rates Notice and subscriber emails. Members of the community were invited to provide their feedback on the Your Say Survey website or via a written submission.

Council provided the following engagement activities during the engagement process:

- Placed on the council website from Wednesday 22 April 2026
- Facebook posts run on 24 & 30 April 2026, 12, 14, 18 and 28 May 2026



- Advertisement published in the Leader and Murray Pioneer on 29 April 2026 and Murray Valley Standard on 30 April 2026

An advertisement for the public consultation. It features the Mid Murray Council logo and the text 'YOUR SAY' in large white letters on a blue background. Below this, it states: 'Council is currently seeking feedback on the following: Community Wastewater Management Systems (CWMS) Charges for 2026/27'. It then explains that given the significant changes being proposed and the potential financial impact on property owners, public consultation is being undertaken. It lists the following information meetings for impacted property owners: 'The Arkaba Hotel, Fullarton – Wednesday, May 6 at 6pm', 'Mannum Council Office – Thursday, May 14 at 6pm (also live streamed)', and 'Blanchetown Community Hall – Tuesday, May 19 at 6pm'. It asks people to register to attend via Council's Your Say website. It then says 'Where to obtain further information' and provides a Fact Sheet containing details on the proposed changes, available on Council's Your Say website or at Council Offices located at Mannum, Cambra, Morgan or Blanchetown. It then says 'How to provide feedback' and lists the following means: 'Mid Murray Your Say feedback form', 'Letter addressed to the Chief Executive Officer, Mid Murray Council, PO Box 28, Mannum SA 5238; or', and 'Email postbox@mid-murray.sa.gov.au'. It states that submissions must be received prior to 12pm Monday 1 June 2026. It ends with the name 'Ben Scales' and the title 'Chief Executive Officer'.

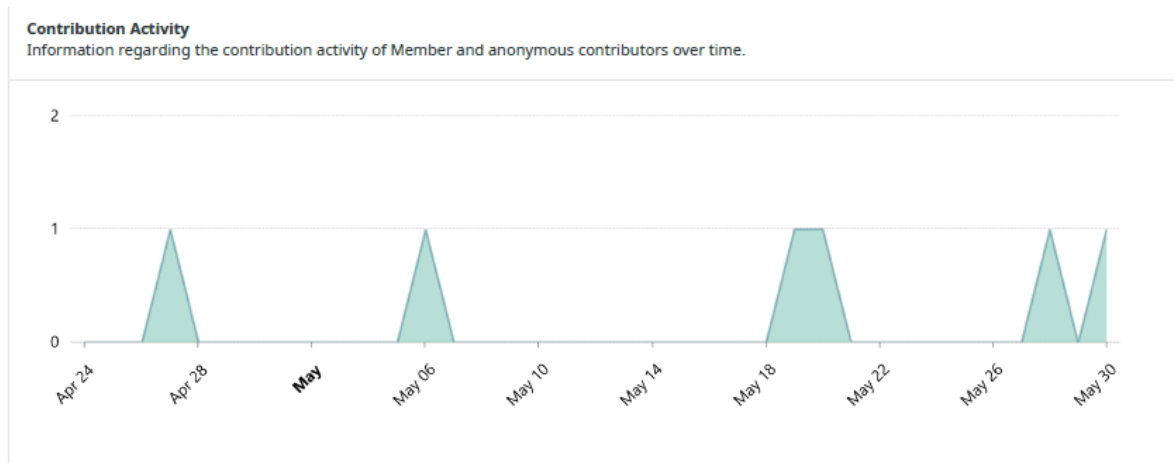
- Consultation letter to CWMS residents sent out with quarterly rates notice (starting week of 27 April 2026)
- Consultation letter emailed to all CWMS Association
- Media Release emailed to Council's media list
- Fact sheet emailed to Councils subscriber list
- Community meetings held:

- Arkaba Hotel – 6 May 2026
- Mannum (and vi Zoom) – 14 May 2026
- Blanchetown – 19 May 2026

Response rate

During the consultation period, the following feedback and submissions were received:

- Forty (40) residents attended the Community meetings.
- Eleven (11) written submissions were received.
- From the “Your Say” website, eight (8) submissions were received (one of which was excluded as it lacked information).
- Resulting from the community meetings and website documents, numerous queries on the calculations for individual schemes were also responded to.



Appendix 2 – Media Release

MEDIA RELEASE

PROPOSED NEW METHODOLOGY FOR CALCULATING CWMS CHARGES FOR 2026/27

Last year, as part of the consultation on its Annual Business Plan & Budget and Long Term Financial Plan, Council proposed changes to the financing of Council's Community Wastewater Management Systems (CWMS) schemes and the associated Annual Service Fee and capital contributions required for future works based on recommendations by the Essential Services Commission of SA (ESCOSA).

Following feedback received through the consultation process, the proposed changes were not introduced in 2025/26, with Council resolving to review the CWMS Annual Service Fee for 2026/27 and an annual capital charge based on an annuity cost for each scheme as a large number of schemes are entering mid-life and require material amounts of capital expenditure to be undertaken across the next 10 years.

Modelling has now been undertaken to incorporate a capital renewal annuity cost into the 2026/27 CWMS Annual Service Fee to fund the future capital renewal requirements of each individual scheme.

The proposed new model has been developed with the objective of complying with the Essential Services Commission of South Australia's pricing principles to achieve full cost recovery of operating expenses and raise sufficient funds for future capital expenditure to ensure the schemes are financially sustainable in the long-term.

Due to the combination of now recovering all operating costs and also calculating a capital charge, the modelling has indicated that the majority of the schemes will incur a significant annual fee increase.

As a result, Council has considered the potential financial impact on property owners of the proposed changes, and is proposing that any increase to the CWMS Annual Service Fee will be phased in over five (5) years, with any annual increase to be capped at \$250.

Overall, if the new methodology is implemented, this will result in an average increase of \$190 per connection in 2026/27, being the first of five years of phased increases.

Given the significant changes being proposed and the potential financial impact on property owners who have a CWMS public consultation on the proposed changes is being undertaken from **Wednesday 22 April 2026 to 12pm Monday 1 June 2026**.

As part of the consultation process on the proposed changes, Council will be holding the following information meetings for impacted property owners and interested community members:

Adelaide – Arkaba Hotel, Fullarton

Wednesday, May 6 @ 6pm

Mannum – Mannum Council Office (which will also be live streamed)

Thursday, May 14 2026 @ 6pm

Blanchetown – Blanchetown Community Hall

Tuesday, May 19 @ 6pm

Tickets are required to attend the information meetings, and can be booked at <https://www.eventbrite.com.au/>

Further information on the consultation, including a fact sheet and how to make a submission, can be found on Council's Your Say website at <https://engagement.mid-murray.sa.gov.au/>

Feedback can be provided by the following means:

- Mid Murray Your Say feedback form;
- Letter addressed to the Chief Executive Officer, Mid Murray Council, PO Box 28, Mannum SA 5238; or
- Email postbox@mid-murray.sa.gov.au

Submissions will be received until **12:00 pm Monday 1 June 2026**.

– ENDS –

MEDIA CONTACT:

Mid Murray Council Chief Executive Officer Ben Scales
P: 8569 0100 | E: postbox@mid-murray.sa.gov.au

Appendix 3 – Fact Sheet

Background

Mid Murray Council presently has 28 Community Wastewater Management Systems (CWMS), and is responsible for the maintenance, renewal and compliance requirements of SA Health, the Essential Services Commission of South Australia (ESCOSA), and the *Local Government Act and Regulations*.

An annual service fee is raised to maintain the systems. The revenue raised from this charge can only be applied to maintenance, renewal and upgrades of the specific scheme and only to those properties that have the ability to access the service are levied.

In previous years, the fee setting did not include the recovery of all internal indirect/overhead costs or the funds necessary to cover the future renewal of the system's infrastructure costs.

The exception to this is the Truro and Cowirra Schemes that have been constructed in recent years, funded with the support of State Government Grants, that have the requirement that the annual service fee is based on the operating costs of the schemes and to cover the annual depreciation expense.

As a result of not including indirect/overhead and renewal of infrastructure costs, general ratepayers (including those who do not receive the CWMS service) have been subsidising the true cost of providing the service. This cross-subsidisation is not permitted under legislation, which requires that only those who benefit from the service bear its full cost.

Comparison to SA Water

In benchmarking the CWMS annual service fee to the current SA Water sewerage charge, Council is charging approximately \$159 less per connection on average. With 28 schemes, each averaging 65 connections (SA Water averaging 13,250 connections) and with a total distance of 111km from Council's most northern scheme, North West Bend to Bolto in the South, SA Water's cost to service each connection is also lower than Council's due to the economies of scale that SA Water would have by servicing a significantly larger number of connections in higher-density areas.

The table below provides a comparison of SA Water to Mid Murray:

	Mid Murray Council	SA Water
Number of schemes	28	43
Total connections	1,855	563,803
Average connections per scheme	66 <i>(6 being the smallest number of connections)</i>	13,112
Annual Service Fee 2025/26	\$454 <i>(74% of SA Water's Fee)</i>	\$613 <i>(if raised by SA Water Fee)</i>

Full Cost Attribution

In response to a recommendation by Council's external auditors and the legislative requirement of the Section 11(3) of the [Local Government \(Financial Management\) Regulations](#) (the Regulations), Council committed to implement a Full Cost Attribution

project across the 2024/25 financial year, with the establishment of associated policies and procedures.

The Regulations require councils to report on each function, activity, good or service of the council, on a full cost attribution basis.

A full cost attribution basis means that all direct costs, and appropriate indirect and overhead costs, are allocated to the function, activity, good or service on a reliable and consistent basis.

Indirect and overhead costs are costs that are not directly attributable to a specific service, however are necessary for the overall operation of the organisation.

To comply with the Regulations, Council has now implemented the recovery of the appropriate proportion of the following internal indirect/overhead costs for each external service:

- Occupancy
- Information Technology / Records Management
- Customer Service
- Rates / Revenue Collection
- External/Internal Audit
- Finance & Accounting
- Work Health & Safety / Risk Management
- Human Resources / Payroll
- Corporate Services.

Essential Services Commission of South Australia

The Essential Services Commission of South Australia's (ESCOSA) pricing principles guidance requires all councils to set water and sewerage service charges to achieve full cost recovery, including direct operational and maintenance costs, as well as internal indirect/overhead costs, and to recover adequate funds for the future renewal of the system's infrastructure.

Moving forward

With many of Council's CWMS now entering mid-life (on average 58% of assets being "As New Condition"), the frequency and cost of renewal of capital items will now increase. For the financial sustainability and viability of the schemes, it is important that sufficient funds are raised to ensure that ongoing preventative maintenance and planned renewals are able to occur in a timely manner.

As mentioned above, historically, the CWMS annual service fee for all schemes (except Cowirra and Truro) has principally been set to only recover the direct operational and maintenance cost and have excluded indirect/overhead costs and also excluded the collection of the funds necessary to cover the timely future renewal of the system's infrastructure costs.

The table below shows the costs that Council is proposing to recover from the schemes as per the ESCOSA costing principles:

	Direct costs	Indirect & Overhead costs	Capital (Renewal Annuity) charge
ESCOSA costing principles	✓	✓	✓

Section 155(5) of the [Local Government Act 1999](#) (the Act) restricts the maximum amount that can be charged to a user to ensure that councils do not seek to recover an annual service charge that exceeds the cost to the council of establishing, operating, maintaining, improving and replacing (including future capital works) the services provided in its area.

Phasing in the Cost Recovery

In 2025-26 for the first time the Council's Budget was prepared to include full cost attribution to provide a true cost of providing individual services, including direct, indirect and overhead costs. This ensures that expenses are fairly assigned to functions, leading to better cost management, informed decision making and where applicable, recovering the appropriate user pays service charge.

As a result, from a total indirect cost amount of \$5.1million across the organisation, an amount of \$355,000 was distributed to the external service area of CWMS schemes.

In addition, as mentioned above, the ESCOSA pricing principles guidance requires all councils to set water and sewerage service charges to achieve full cost recovery including:

- Operational, maintenance, indirect and overhead costs; and
- Provision for asset renewal (renewal annuity or depreciation expense).

With many of the schemes now entering mid-life, a total amount of \$23.6million of capital renewal has been budgeted across the next 25 years, compared to total scheme funds of \$923,000 as at 30 June 2025.

The majority of the CWMS scheme assets were previously gifted to Council, either by private bodies (individual owners, Shack Associations) and/or Government grants. Due to this, the most appropriate method (as per ESCOSA pricing principles) to recover future asset replacement costs is by a renewal annuity. The renewal annuity relies on the information contained within Council's CWMS Asset Management Plan (AMP) that specifies the prudent and efficient capital expenditure for renewing, upgrading or extending assets over a medium to long-term time period, and to convert the capital expenditure forecasts to a future annualised capital charge, rather than recovering the amount of depreciation. The future annualised capital charge is calculated to ensure there are available funds to cover capital renewal in the future years.

In calculating the future annualised capital charge from the CWMS Asset Management Plan, the next 10 years, being 2026/27- 2035/36, of indexed capital expenditure (incorporating forecasted CPI) totalling \$11.8million is used in an annuity calculation for each individual schemes' annual future planned capital expenditure.

Due to the majority of the schemes being mid-age, several schemes have material capital amounts of capital renewal in this next 10-year period. Many of the schemes also have large amounts in either the first year, or several early years, and due to these situations a

very high annual annuity capital amount will be calculated in 2026/27 under the proposed methodology as a result of the delay of calculating and raising renewal funding in the previous decades. In extreme circumstances if the fund balance of an individual scheme becoming a material deficit, Council may raise a special capital contribution against each property, and many schemes now have the legacy of a lack of funds being collected in the earlier years of the schemes for capital renewal that will occur in the near future.

Due to the combination of now recovering indirect/overhead costs and also calculating a capital charge, the modelling has indicated that the majority of the schemes will require a very high annual fee increase. As a result, when considering the potential financial strain and the ability for some owners to pay, it is recommended that the increase of the CWMS Annual Service Fee be phased over five (5) years, and that any annual increase should also be capped at \$250.

Overall, if the new methodology is implemented, this will result in an average increase of \$190 per connection in 2026/27, being the first of five year phased increases.

The exception to this is that on the completion of the Cowirra CWMS Scheme, Council resolved to cap the limit of the annual fee to double of the forecasted CPI.

If this model is implemented, over time it will ensure the sustainability of the schemes and the requirements of the ESCOSA pricing principles guidance of achieving full cost recovery, including current shortfalls of operating costs, full cost attribution related to indirect and overhead costs, and the CWMS annualised capital charge, are met.

The following are the budget estimates for 2026/27:

Expenditure

Operational and maintenance costs	\$1,440,000
Capital expenditure (CWMS infrastructure)	<u>\$889,000</u>
Total	<u>\$2,324,439</u>

Income

CWMS Annual Service Fee (Phase 1 of 5 years)	<u>\$1,164,000</u>
---	---------------------------

Note - CWMS Annual Service Fee in 2025/26 was \$843,000.

The recovery of the annualised capital charge will in future years reduce the requirement for Council to charge a capital contribution when Capital renewal works are required due to the additional income being held in each scheme's funds. This ensures that the users are contributing to the future renewal of the scheme assets progressively rather than when the renewal is required.

All funds are accounted for within each independent CWMS scheme with all costs and revenue being attributed to either the operational or capital renewal expenditure. The income, expenditure and scheme balances are included in the Council's annual financial audit that is performed by our external auditors.

The table below provides details of each scheme's annual infrastructure requirements, and the current and proposed service charge for 2026/27:

Mid Murray Council Community Wastewater Management Systems

Scheme	No. Property Units	10yr Capital Expenditure (\$)	CWMS Annual Service Charge 2025/26 (\$)	Proposed CWMS Annual Service Charge 2026/27 (\$)
Cwms Big Bend	25	259,072	696	946
Cwms Blanchetown	238	311,646	365	480
Cwms Bolto	44	87,522	564	814
Cwms Bowhill	157	366,771	389	531
Cwms Brenda Park Morphett Flat	133	1,541,631	462	712
Cwms Caloote Landing Area	43	1,071,417	477	727
Cwms Caurnamont	75	793,433	458	708
Cwms Five Mile Kia Marina	13	403,821	1,570	1,820
Cwms Greenways Landing	8	96,633	982	1,232
Cwms Idyll Acres	62	91,373	583	687
Cwms Julanker Younghusband	38	69,628	842	913
Cwms Kroehns Landing	6	240,586	1,303	1,553
Cwms Marks Landing	142	512,164	404	575
Cwms North Punyelroo	12	35,573	321	485
Cwms North West Bend Beaumonts	85	220,102	273	455
Cwms Old Teal Flat	11	74,349	451	701
Cwms Pelican Point	71	58,170	392	593
Cwms Pellaring Flat	24	989,793	565	815
Cwms Rob Loxton & Walker Flat	162	449,531	277	483
Cwms Scotts Creek	101	71,243	459	705
Cwms Scrubby Flat Area	10	222,199	578	828
Cwms Seven Mile	11	401,340	742	992
Cwms South Punyelroo	100	877,552	420	639
Cwms Swan Reach	26	266,660	542	792
Cwms Teal Flat	71	180,363	405	514
Cwms The Rocks	6	190,434	1,078	1,328
Cwms Truro (Refer to split below)	-	109,172	-	-
Truro - Normal	67		746	822
Truro - Aerobic	20		373	411
Truro - Private Pumping	11		716	788
Cwms Cowirra	55	46,218	680	719

Consultation

As part of the process of preparing the Annual Business Plan (ABP) & Budget and the Long Term Financial Plan (LTFP), given the proposed changes to the methodology of calculating the CWMS Annual Service Fee as outlined above, Council is seeking specific feedback from users of Council's CWMS on the proposal before any changes are made and the ABP & Budget and LTFP are finalised.

Information on the consultation is available on Council's [Your Say](#) website, and feedback can be provided by completing the form available on the website, or by providing written feedback via postbox@mid-murray.sa.gov.au

Feedback provided by email should be titled:

- Proposed new methodology for calculating CWMS charges for 2026/27

Submissions in relation to the 2026/27 CWMS annual service charges are to be lodged prior to noon Monday 1 June 2026.

If you have any questions, please contact Council's Director - Corporate & Financial Services, Clive Hempel, on 8569 0100 or via email postbox@mid-murray.sa.gov.au

Appendix 4 – Submissions

Tracy Bawden

From: Andrew Bower
Sent: Thursday, 23 April 2026 5:10 PM
To: Post Box
Subject: IEM6941-26 - 18/CON/SUR/20 - Fw: OEM2559-26 - 18/CON/SUR/10 - Consultation on Community Wastewater Management Systems Charges for 2026/27
Attachments: Consultation-CWMS Annual Business Plan 2026-27 - Fact Sheet.pdf

I'll make a suggestion

Fix all the meters that 'don't work', levy the excess water as appropriate, then leave the standard charges as they are currently.

-A

Sent with [Proton Mail](#) secure email.

----- Forwarded Message -----

From: MMC Communications <mmccommunications@mid-murray.sa.gov.au>

Date: On Thursday, 23 April 2026 at 16:22

Subject: OEM2559-26 - 18/CON/SUR/10 - Consultation on Community Wastewater Management Systems Charges for 2026/27

To:

Dear Mid Murray Council Subscriber,

Public Consultation is now open for Community Wastewater Management Systems Charges for 2026/27 and submissions must be received prior to **12 noon Monday 1 June 2026**.

Please see attached Fact Sheet and visit our [website](#) for further details.

[Click here](#) to unsubscribe.

Edwards GSL Pty Ltd (formerly Iburis Pty Ltd)

Pelican Point via Morgan SA 5320

To: Mid Murray Council

Re: Proposed new methodology for calculating CWMS charges for 2026/27

CWMS Properties: Pelican Point via Morgan SA 5320

I write to formally oppose the proposed CWMS Annual Service Fee increases outlined in the Consultation – CWMS Annual Business Plan 2026/27 – Fact Sheet.

While I acknowledge Council's obligation to comply with ESCOSA pricing principles and relevant provisions of the Local Government Act 1999 and associated regulations, the scale, timing and structure of the proposed increase are demonstrably unfair, economically excessive, and poorly aligned with the current cost-of-living environment faced by ratepayers.

Increase materially out of line with CPI and community capacity to pay:

Council's modelling indicates an average increase of approximately \$190 per connection in 2026/27 alone. For many schemes, this represents a significant percentage uplift that far exceeds CPI and household income growth. Even with an annual cap of \$250, the increase remains disconnected from inflationary benchmarks during an ongoing cost-of-living crisis.

Retrospective cost recovery reflects historic budget mismanagement:

The proposal acknowledges that indirect costs and capital renewal funding were not adequately recovered over previous decades. This position is the result of historic policy and budget decisions, not user behaviour. It is inequitable to impose sharp increases on current users to retrospectively remedy long-standing governance failures.

Fiscal responsibility rests with Council, not ratepayers:

As a third tier of government, Council has an obligation to manage finances prudently over time. The need for accelerated cost recovery reflects deficiencies in long-term financial planning, and ratepayers should not be expected to bear the consequences of that mismanagement in a short timeframe.

This is a policy decision requiring electoral accountability:

The proposed pricing methodology represents a material policy shift. Given the proximity of the November 2026 Council elections, elected members should seek a clear mandate from the community rather than implement substantial increases immediately prior to the election period.

Requested outcome:

1. Reject the proposed increases in their current form.
2. Align future increases more closely with CPI or household income growth.
3. Absorb a portion of historical shortfalls within Council's broader financial framework.
4. Defer major structural pricing changes until after the 2026 Council elections.

Conclusion:

Although the proposal may align with regulatory guidance, it is socially unjust, economically disproportionate, and poorly timed. I urge Council to reconsider the proposed CWMS pricing methodology in full.

Yours sincerely,

A large black rectangular redaction box covering the signature area.

Sean Edwards
Director

Two lines of black rectangular redaction boxes covering contact information.

Tracy Bawden

From: Noel <
Sent: > Monday, 27 April 2026 7:14 AM
To: Post Box
Subject: IEM7020-26 - 18/CON/SUR/20 - SWMS, Pelican Point

Sir / Madam.

I note with concern your intention to significantly raise the charge to rate payers for Sted system maintenance at a number of locations.

I am the owner of sites Pelican Point, having been the rate payer to these sites for over 30 years. Since the sted connection there has been little evidence of costly ongoing maintenance works, excluding natural flood control work.

Please take note, I reject any suggestion of a justified price increase to provide sted services. Council has requested consultation / feedback, this is my submission, please retain the annual charge at the present level.

Thank you.

Regards



Kerry Rowlands

Property: 7 [REDACTED], Five Miles
(Postal: [REDACTED])

31 May 2026

Mr Ben Scales
Chief Executive Officer
Mid Murray Council
PO Box 28 Mannum SA 5238

By email: postbox@mid-murray.sa.gov.au

Cc:

Mayor Simone Bailey - mayor@mid-murray.sa.gov.au
Councillor Kevin Myers - crkmyers@mid-murray.sa.gov.au
Councillor Jen Davis - crjdavis@mid-murray.sa.gov.au
Councillor Geoff Barber - crgbarber@mid-murray.sa.gov.au
Councillor Roslyn Schultz - crrschultz@mid-murray.sa.gov.au
Councillor Georga Warhurst - crgwarhurst@mid-murray.sa.gov.au
Councillor Kirsty MacGregor - crkmacgregor@mid-murray.sa.gov.au
Councillor Mandy Toczec McPeake - crmtoczecmcpeake@mid-murray.sa.gov.au
Councillor Victoria Hammond - crvhammond@mid-murray.sa.gov.au
Mr Clive Hempel, Director Corporate and Financial Services - postbox@mid-murray.sa.gov.au

Dear Mr Scales,

Re: Formal submission — Proposed new methodology for calculating CWMS charges for 2026/27 (Five Mile / Kia Marina scheme)

I make this submission on the proposed new methodology for calculating CWMS charges for 2026/27, as it applies to the Five Mile / Kia Marina scheme, building on my earlier submission and information request on 19 May 2026.

I acknowledge the responsiveness and transparency of Council staff, in particular Mr Clive Hempel, who provided detailed written responses to my requests. That engagement is appreciated and has enabled a constructive, fact-based submission.

My concern is not with proper cost recovery in principle. I accept that schemes must be sustainable and that ESCOSA and National Water Initiative (NWI) principles point toward full cost recovery, including renewals. My aim is a charge that is genuinely fair, transparent and cost-reflective, and properly allocated between residential and commercial users — which matters acutely here, as this is one of Council's smallest schemes, where the treatment of a single commercial unit materially affects every household.

I also note at the outset that the 2031/32 renewal design and capacity information I requested on 19 May has not been provided. This submission is therefore necessarily made without the ability to review that information (see Point 3).

What I am asking Council to do

Before the 2026/27 charge and the Long Term Financial Plan are finalised, I ask Council to:

1. review whether Kia Marina and the commercial slipway have been correctly classified and unitised, rather than each charged as a single residential-equivalent unit;
2. if the review finds the classification of Kia Marina was not correct, consider adjusting the historic shortfall so existing members are not unduly impacted by a deficit that arose largely from a Council decision;
3. reconsider the annuity recovery period in favour of an asset-life-aligned horizon; and
4. provide the design basis and capacity assessment for the 2031/32 renewal works, confirming whether they are like-for-like renewals or include capacity for new/expanded demand and, if the latter, allocate that cost to the demand driver under Council's Additional Connections Policy.

1. How the property units are calculated

The LGA Property Units Code applies user-pays principles: premises generating higher waste loads are charged at correspondingly higher unit multiples. On Council's listing, the scheme's 13 units comprise 11 residential properties (one unit each), Kia Marina and the commercial slipway — with both commercial premises treated as a single residential-equivalent unit each.

The 2017 decision. The current 13-unit basis largely results from Council's confidential decision of 14 February 2017. Before then, Kia Marina was charged for 12 units, so the scheme recovered costs across roughly 24 units. The 2017 decision reduced the marina to one unit and remitted \$20,209 in charges, fines and interest.

That decision relied on legal advice (Kellady Jones, 2016), but the advice did not simply conclude "charge one unit". It made two points: that only one connection could carry a service charge (because the berths sit on separate titles but share a single connection point, engaging s155(11) of the LG Act); but that this connection should still be unitised under the CWMS Property Units Code (the Code) and, with no marina category, that the most relevant category was caravan parks (Clause 3.11), producing materially more than one unit. The advice offered two mechanisms to ensure all marina beneficiaries contributed:

Option 1: assess Kia Marina on property units under the caravan-park category (Clause 3.11); or

Option 2: declare a separate rate across all marina berths, with a 100% rebate on Kia Marina so it is not charged twice (requiring consultation under s151(5) of the LG Act).

Neither mechanism appears to have been implemented, the marina was simply reduced to one unit as per the confidential Council Meeting minutes of the 14 February 2017.

Transparency and follow-up. The 2017 decision directly and permanently affected every other ratepayer, and it is unclear whether affected members were ever told. The same minutes resolved that the service charge for Kia Marina be investigated and that a Management Agreement be developed via workshop; it is unclear whether either occurred. I would welcome confirmation.

The credit was charged back to residents. Council has confirmed the \$20,209 remission, including interest and fines, was booked as a reduction of scheme income, increasing the scheme's deficit — so it was absorbed by the fund, and ultimately by remaining ratepayers, rather than general revenue. The scheme has run a deficit ever since (about \$30,204 at 30 June 2025). Because Council's new pricing

methodology now seeks to clear deficits and pre-fund renewals, residents are effectively being asked to make good a shortfall arising from a decision that benefited a commercial operator.

Materiality. The financial effect on residents has been significant. On Council's own charges, the marina's contribution that was foregone by reducing it from 12 units to 1 totals approximately \$138,000 in lost scheme income over 2012/13–2025/26 (including the \$20,209 remission) — being roughly \$109,000 effectively redistributed across the 11 residential properties (about \$9,900 per remaining ratepayer). Put another way, had the marina continued to contribute on its former basis, the scheme would likely be in a surplus of around \$108,500 rather than a deficit of about \$30,200. These are indicative figures derived from Council's own data, which I would welcome Council testing. I also recognise that applying the legal advice would not necessarily have maintained the full 12 units; assessment under the caravan-park category may well have produced a lower figure. But it would still have yielded materially more than one unit, and the difference to residents remains substantial on any reasonable basis.

Correct classification. Council states it is restricted by the Unit Code. With respect, the Code does not require a commercial premises to be charged as a single residential unit — and Council's own response confirms this, acknowledging that the Kellady Jones, 2016 legal advice recommended charging the marina on caravan-park principles, which yields more than one unit:

- **Kia Marina** — moors a hire fleet of houseboats pumping out through the single connection (as per Kellady Jones, 2016 legal advice); the legal advice itself pointed to the caravan-park category plus a unit for any operator residence/office, indicating well above one unit.
- **Commercial Slipway** — recorded as “Industry – Other”. While it does not appear to operate as a commercial slipway now, I understand it historically did, and the classification and unit basis should reflect the actual use over the relevant period. Under Clause 3.10 of the Code, industrial premises are unitised on staff ablutions, with separate consideration for trade waste or higher loads — a slipway servicing vessels arguably loaded the system more than a household.

Had the marina and/or commercial slipway been unitised under these provisions, the per-unit base would be materially larger and every household's charge materially lower.

This is also a live issue: Council has confirmed two DAs are lodged over the slipway property (723 East Front Road) which, if approved, would add 8 residential dwellings, which Council has advised these would be charged as 8 property units. That is the correct user-pays treatment for additional residential load, and it underscores the point — if 8 new dwellings each warrant a unit, the existing commercial premises warrant proper assessment too. Any capacity upgrade required for the new dwellings should be funded by the developer under Council's Additional Connections Policy (Point 3 below).

In light of NWI principles (user-pays, cost-reflective pricing and recovery from those who benefit) and s155(5) of the LG Act, charging two commercial premises as single households while loading the shortfall onto residents needs to be reconsidered.

2. The annuity recovers future capital over too short a period

Council has disclosed the build-up of the proposed charge and the annuity calculation, which I appreciate. I understand that pre-funding renewals through an annuity is itself consistent with an NWI/ESCOSA approach. My concern is the period over which it is being recovered.

Most NWI-aligned renewals annuity models are built from the whole asset portfolio and long-term renewal forecasts aligned to asset lives and replacement cycles, recovered over an extended horizon.

Council's methodology instead recovers the scheme's renewal program over a comparatively short period, front-loading the cost onto today's 13 ratepayers rather than spreading it across the life of the assets and all beneficiaries.

This compounds the issue from Point 1. The 2017 decision left the scheme in a sustained deficit — an under-recovery that is now being made good from existing members, and recovered at an accelerated rate through the annuity. Residents are therefore being asked to clear an old shortfall and pre-fund future renewals simultaneously, over a short window.

The open question is simply whether it is appropriate, and consistent with cost-reflective pricing, to recover renewal costs over such a short period. I ask Council to consider a longer, asset-life-aligned recovery horizon.

3. Renewal vs increased capacity — information not received

My 19 May 2026 submission requested the design basis and capacity assessment for the significant 2031/32 works (pump sump, 57,000-litre IAT tank, 22,000-litre balance tank, trafficable lids). This has not been provided as at the date of this submission and this submission is therefore made without the ability to review it, and I reserve the right to comment further once it is available.

Without it, ratepayers cannot tell whether the works are like-for-like renewals sized for current load, or sized to provide additional capacity. This is decisive because Council's own Additional Connections Policy states it is inequitable for existing landowners to fund upgrades driven by new connections, and that new and commercial connections must fund their own capacity upgrade and equity contribution — a user-pays principle Council has already adopted.

If any works provide capacity beyond existing residential demand, that incremental cost should be allocated to the demand driver, not recovered through residents' annuity. If they are genuine renewals, a short confirmation would resolve the concern.

Adjusting the shortfall so existing members are not unduly impacted

My central concern is that existing members are being asked to make good — through an accelerated annuity — a shortfall that arose largely from a Council decision benefiting a commercial operator. The fairest correction is forward-looking, and open to Council: writing the legacy deficit back to general revenue (it was booked against the scheme fund — residents — yet Council's own position is that cross-subsidisation is not permitted); resetting the unit base prospectively (Point 1), which immediately lowers the per-unit charge for everyone; lengthening the annuity recovery period (Point 2); and avoiding, spreading or deferring any special capital contribution. I recognise most of these require a Council resolution and that a retrospective refund is difficult — so my request is prospective: that the correction be made going forward, so existing members are not left carrying a shortfall that did not originate with them.

Requested outcome

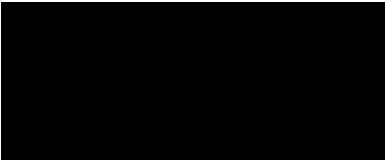
I ask that, before finalising the 2026/27 charge and Long Term Financial Plan for this scheme, Council:

1. re-assess the classification and unit treatment of Kia Marina and the commercial slipway under the relevant Code clauses, and confirm the basis;

2. if the review finds the classification of Kia Marina was not correct, consider adjusting the historic shortfall so existing members are not unduly impacted by a deficit that arose largely from a Council decision;
3. reconsider the annuity recovery period in favour of an asset-life-aligned horizon; and
4. provide the 2031/32 design/capacity assessment, allocating any growth-related cost to the demand driver — and, failing that, record that affected ratepayers were not given sufficient information to fully assess the increase.

I make this submission constructively, in support of a sustainable scheme and a charge that meets ESCOSA and NWI principles — built from a fair unit base, recovered over a reasonable period, and properly allocated between residential and commercial users. Please treat it as a formal submission to the 2026/27 consultation. I am happy to discuss and to share my supporting analysis.

Yours sincerely,

A solid black rectangular box used to redact the signature of Kerry Rowlands.

Kerry Rowlands

Kerry Rowlands

Property: [REDACTED] FIVE MILES
(Postal: [REDACTED])

19 May 2025

Mr Ben Scales
Chief Executive Officer
Mid Murray Council
PO Box 28
Mannum SA 5238

By email: postbox@mid-murray.sa.gov.au

Cc:

Mayor Simone Bailey - mayor@mid-murray.sa.gov.au
Councillor Kevin Myers - crkmyers@mid-murray.sa.gov.au
Councillor Jen Davis - crjdavis@mid-murray.sa.gov.au
Councillor Geoff Barber - crgbarber@mid-murray.sa.gov.au
Councillor Roslyn Schultz - crschultz@mid-murray.sa.gov.au
Councillor Georga Warhurst - crgwarhurst@mid-murray.sa.gov.au
Councillor Kirsty MacGregor - crkmacgregor@mid-murray.sa.gov.au
Councillor Mandy Toczec McPeake - crmtoczecmcpeake@mid-murray.sa.gov.au
Councillor Victoria Hammond - crvhammond@mid-murray.sa.gov.au
Mr Clive Hempel, Director Corporate and Financial Services - postbox@mid-murray.sa.gov.au

Dear Mr Scales,

Re: Five Mile/Kia Marina CWMS charge — request for essential supporting information

I write regarding Council's proposed 2026/27 Community Wastewater Management Scheme charge for the Five Mile/Kia Marina scheme.

Council's consultation material states that the Five Mile/Kia Marina scheme has:

- 13 property units;
- \$403,821 in 10-year indexed capital expenditure;
- a current 2025/26 annual service charge of \$1,570 per unit; and
- a proposed 2026/27 annual service charge of \$1,820 per unit (capped at a \$250 increase).

I acknowledge Council's responsibility to maintain safe, compliant and financially sustainable wastewater infrastructure. I also acknowledge Council's position that CWMS charges should move toward full cost recovery, including direct operating costs, appropriate indirect and overhead costs, and future capital renewal through a renewal annuity.

I was unable to attend the community information session in person, however, I have reviewed the Mannum session material and, based on that review, the key questions raised in this letter remain unanswered.

My concern is not with proper cost recovery in principle. My concern is that the proposed charge for this particular scheme cannot be properly assessed without a clear explanation of:

1. the 13-property-unit calculation;
2. the existing \$1,570 base charge;
3. the treatment of Kia Marina and the commercial slipway;
4. the basis for the significant 2031/32 renewal works; and
5. whether the charge is demonstrably consistent with ESCOSA and National Water Initiative pricing principles.

Council's fact sheet refers to ESCOSA pricing principles and states that charges should recover operational, maintenance, indirect/overhead costs and provision for asset renewal. I understand that the relevant National Water Initiative pricing principles include full cost recovery, user-pays and cost-reflective pricing, pricing transparency, recovery of prudent and efficient capital renewal costs, and proper treatment of contributed assets.

Council's own material refers to section 155(5) of the Local Government Act 1999, which requires an annual service charge to be linked to the cost of providing the service. For that reason, affected ratepayers need enough information to understand what costs make up the current \$1,570 charge and the proposed \$1,820 capped charge, and whether those costs have been fairly allocated across all properties that use or benefit from the Five Mile/Kia Marina scheme.

On that basis, I request the following essential information before Council finalises the 2026/27 charge.

1. Reconciliation of the 13 property units

Local ratepayers understand that the Five Mile/Kia Marina scheme area includes 11 connected shacks, as well as Kia Marina and the commercial slipway. It is assumed that the 2 vacant lots (Lot 12 & Lot 13) are not connected. Refer to the diagram below.



The confirm this assumption please provide a simple reconciliation of the 13 property units, showing:

1. how many residential shack properties are included;
2. whether Kia Marina is included;
3. whether the commercial slipway is included;
4. how many property units are attributed to Kia Marina;
5. how many property units are attributed to the commercial slipway; and
6. whether any connected or serviceable property has been excluded, exempted or treated differently.

2. Treatment of Kia Marina and the commercial slipway

Given the small size of the scheme, the treatment of even one commercial property unit has a material effect on the amount paid by residential ratepayers.

Please confirm whether Kia Marina and the commercial slipway are:

1. connected to the CWMS;
2. able to connect to the CWMS;
3. charged as part of the 13 property units;
4. exempt from the charge;
5. operating under separate wastewater arrangements; and
6. if either commercial premises is included in the scheme, please provide the basis on which its property units were calculated. In particular, please confirm whether the assessment considered commercial wastewater load, staff/customer use, toilets, showers, laundry, houseboat or marina activity, pump-out facilities, peak seasonal use, trade waste, or other non-residential demand.

3. Explanation of the existing \$1,570 base charge

The current 2025/26 annual service charge for Five Mile/Kia Marina is already \$1,570 per property unit, before the proposed capped increase to \$1,820 in 2026/27.

This is a significant starting charge for a small scheme of only 13 property units. Before any further increase is adopted, ratepayers need to understand what costs are already embedded in the current base charge and how Council has determined that the charge is cost-reflective and compliant with applicable pricing principles.

Please provide the calculation or reconciliation of the current \$1,570 charge, showing:

1. the direct operating and maintenance cost component;
2. the indirect/overhead cost component;
3. any capital renewal component already included in the current charge;
4. any historical deficit or scheme fund balance adjustment;
5. any debt, interest, loan or reserve recovery component;

6. any unusually high scheme-specific costs, including pumping, electricity, irrigation, testing, compliance, repairs or contractor costs;
7. any commercial or non-residential cost allocation;
8. the number of actual connections and property units used in the calculation; and
9. how Council has satisfied itself that the current base charge reflects prudent and efficient costs for the Five Mile/Kia Marina scheme.

4. 2031/32 renewal works — existing capacity or increased capacity

The capital works information appears to show significant Five Mile/Kia Marina works in 2031/32, including renewal of a pump sump, a 57,000 litre IAT tank, a 22,000 litre balance tank, and trafficable lids x13.

Please confirm whether these works are:

1. like-for-like renewal of existing assets sized only for the current wastewater load; or
2. sized to provide additional capacity for Kia Marina, the commercial slipway, peak seasonal use, future connections, compliance buffers, growth, or other increased demand.

Please provide the design basis or capacity assessment for the 2031/32 works, including the assumed number of connections/property units, commercial load assumptions and any allowance for future growth or commercial use.

This is important because, if the works include capacity beyond existing residential demand, Council should explain how those costs have been allocated consistently with cost-reflective and user-pays pricing principles.

5. Charge calculation and phase-in path

Please provide the calculation showing how the proposed \$1,820 per unit charge was determined for Five Mile/Kia Marina, including:

1. the operating cost component;
2. the indirect/overhead cost component;
3. the capital renewal annuity component;
4. the uncapped calculated charge before the \$250 phase-in cap; and
5. the expected charge path over the five-year phase-in period.

This information is needed so affected ratepayers can understand the expected charge path and whether the proposed charge is transparent, cost-reflective and properly allocated between residential and commercial users.

6. Treatment of contributed assets

Council's fact sheet states that the majority of CWMS assets were previously gifted to Council by private bodies, individual owners, shack associations and/or government grants.

Please confirm whether any Five Mile/Kia Marina CWMS assets were originally funded or contributed by shack owners, Kia Marina, the commercial slipway, developers, government grants or any other party.

If so, please explain how those contributed assets have been treated in the annuity model, including how Council has ensured that current users are not being charged again for capital that was previously contributed, except to the extent required for future renewal or replacement.

Requested outcome

I request that Council provide this information before finalising the 2026/27 charge for the Five Mile/Kia Marina scheme.

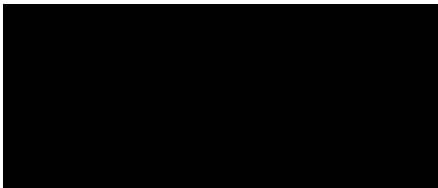
Given that consultation closes at 12:00 pm on Monday 1 June 2026, we request a written response by Wednesday 27 May 2026, or as soon as possible before the close of consultation.

If Council cannot provide the requested information before consultation closes, we ask that Council formally record that affected Five Mile/Kia Marina ratepayers have not been given sufficient scheme-level information to properly assess the proposed increase.

This request is made so affected ratepayers can understand whether the proposed charge is fair, transparent, consistent with ESCOSA and National Water Initiative pricing principles, and properly allocated between residential and commercial users.

Please treat this letter as a formal consultation submission and a request for the essential supporting information behind the proposed Five Mile/Kia Marina CWMS charge.

Yours sincerely,

A large black rectangular box redacting the signature of Kerry Rowlands.

Kerry Rowlands

Tracy Bawden

From: Clive Hempel
Sent: Wednesday, 27 May 2026 10:31 PM
To: [REDACTED]
Subject: OEM3345-26 - 18/CON/SUR/20 - Formal Submission and Request for Supporting Information — Five Miles/Kia Marina CWMS 2026/27 Charge
Attachments: CWMS Five Mile Kia Marina connections.pdf; LGA Property-Units-Code-2006 Community Wastewater Management Systems.pdf; CWMS Summary 30 June 2017.pdf; CWMS Summary 30 June 2018.pdf; CWMS Summary 30 June 2019.pdf; CWMS Summary 30 June 2020.pdf; CWMS Summary 30 June 2021.pdf; CWMS Summary 30 June 2022.pdf; CWMS Summary 30 June 2023.pdf; CWMS Summary 30 June 2024.pdf; CWMS Summary 30 June 2025.pdf; 20170214 Confidential Minutes released 13.06.2017.pdf; 20170214 - Agenda Report & Attachment 9.4.2 Released 13.06.2017.pdf

Hi Kerry,

Thanks for your enquiry in regards to Community Wastewater Management Scheme Charge 2026/27, please find my answers in **red** text, and attachments

1. Reconciliation of the 13 property units

Local ratepayers understand that the Five Mile/Kia Marina scheme area includes 11 connected shacks, as well as Kia Marina and the commercial slipway. It is assumed that the 2 vacant lots (Lot 12 & Lot 13) are not connected. Refer to the diagram below.



The confirm this assumption please provide a simple reconciliation of the 13 property units, showing:

1. how many residential shack properties are included;
2. whether Kia Marina is included;
3. whether the commercial slipway is included;
4. how many property units are attributed to Kia Marina;
5. how many property units are attributed to the commercial slipway; and
6. whether any connected or serviceable property has been excluded, exempted or treated differently.

Please refer to the listing “CWMS Five Mile Kia Marina” each being charged one property unit as per the “LGA Property-Units-Code-2006 Community Wastewater Management Systems”

2. Treatment of Kia Marina and the commercial slipway

Given the small size of the scheme, the treatment of even one commercial property unit has a material effect on the amount paid by residential ratepayers.

Please confirm whether Kia Marina and the commercial slipway are:

1. connected to the CWMS;
2. able to connect to the CWMS;
3. charged as part of the 13 property units;
4. exempt from the charge;
5. operating under separate wastewater arrangements; and
6. if either commercial premises is included in the scheme, please provide the basis on which its property units were calculated. In particular, please confirm whether the assessment considered commercial wastewater load, staff/customer use, toilets, showers, laundry, houseboat or marina activity, pump-out facilities, peak seasonal use, trade waste, or other non-residential demand.

Please refer to the listing “CWMS Five Mile Kia Marina” each being charged one property unit as per as per Local Government Regulations (General) Regulations 2013 Section 12 being the Code for Establishing and Applying Property Units as a Factor for the Imposition of Annual Service Charges for Community Wastewater Management Systems “LGA Property-Units-Code-2006 Community Wastewater Management Systems”.

I performed a review of your scheme balances (due to the deficit balance) and after reviewing the history of Five Maile Kia Marina scheme I have found that in 2016/17 (prior to my employment) a debit of \$12,305 appears in the income for the scheme. I have enclosed the Scheme Income and Expense Summaries from 2016/17 to 2024/25 for your information.

After investigating this relates to a decision of Council in regards to legal advice that the rating of each marina berth was not allowed as only one connection point is available at the property A9970 U51, 707 EAST FRONT ROAD YOUNGHUSBAND SA 5238. Refer to the attached extract from the Council Agenda and Minutes of 14 February 2017.

3. Explanation of the existing \$1,570 base charge

The current 2025/26 annual service charge for Five Mile/Kia Marina is already \$1,570 per property unit, before the proposed capped increase to \$1,820 in 2026/27.

This is a significant starting charge for a small scheme of only 13 property units. Before any further increase is adopted, ratepayers need to understand what costs are already embedded in the current base charge and how Council has determined that the charge is cost-reflective and compliant with applicable pricing principles.

Please provide the calculation or reconciliation of the current \$1,570 charge, showing:

1. the direct operating and maintenance cost component; **Refer below**
2. the indirect/overhead cost component; **Refer below**
3. any capital renewal component already included in the current charge; **No**
4. any historical deficit or scheme fund balance adjustment; **Refer to CWMS Summaries supplied**
5. any debt, interest, loan or reserve recovery component; **Historically No , but moving forward in 2026/27 this will be implemented**
6. any unusually high scheme-specific costs, including pumping, electricity, irrigation, testing, compliance, repairs or contractor costs; **The Council has 28 different schemes that vary from 6 connections to 238 (average 66), with the construction age ranging from 2 year to >25 years, gravity schemes to rising pressure mains, varying percentages of fulltime residents all these factors would need to be accounted to find suitable schemes to successfully adjust and then benchmark against each other. More than willing to provide you a number of years transactions for your scheme to**

review, taking into account the possible distortion of the recent flood event that may have affected the last few years.

7. any commercial or non-residential cost allocation; **No, restricted by the Unit Code (as provided).**
8. the number of actual connections and property units used in the calculation; and **Refer below**
9. how Council has satisfied itself that the current base charge reflects prudent and efficient costs for the Five Mile/Kia Marina scheme. **Since the ESCOSA review nearly four years ago the Council has been striving for efficiencies and cost cutting review of its services. Refer to Councils monthly agenda - Monthly Financial Report that tracks the Sustainability savings of Council, these items can be referenced back to individual Sustainability report that have been presented to Council (Part 13 of the monthly Council agenda). The CWMS Schemes (commencing with larger and more distance) will soon have a rollout of flow meters and advance telemetry installed to allow remote monitoring , starting and restarting of pumps, motors, aerators, irrigation and chlorine dosing, this is expected to reduce maintenance costs and improve water treatment throughput especially during high load periods (Christmas. Easter, etc).**

Historically the Council previously had a Community Wastewater Management System (CWMS) Advisory Committee that consisted of Shack association representatives and Council elected members- Refer to Council [WebPage](#)

Questions 1 & 2

Refer to the last four years of Scheme Income and Expense Summaries from 2021/22 to 2024/25, these show the direct expenses and the indirect expenses of the CWMS Officers & Plant & Equipment cost Distributed (Employee wages, Training, Vehicle and other sundry expenses that have not been directly costed to a particular scheme while performing general scheme inspections, recharging of chlorine runs, collection of water samples etc. are not charged to individual scheme).

The indirect expenses of the CWMS Officers & Plant & Equipment cost Distributed – Is distributed to each scheme based on the number of connections for each scheme compared to the total of all connections (ie . Five Mile & Kia Marina 13 connections/1,826 total connections or 0.71%). One submission has suggested that the distribution should be based on per scheme ie 1/28th (3.57%) to each scheme.

2025/26 is the first year Full Cost Attribution has only been applied to the live ledger, the amount for CWMS for 2025/26 has been budgeted at \$354,900 of a total \$5.1m of costs to be distributed (possibly the actual may be more around \$340k for CWMS, pending EOFY adjustments). It was proposed that the driver the distribution also be on the basis of the number of connections at each scheme.

Question 8

Historical information 2 March 2020 Community Wastewater Management System (CWMS) Advisory Committee Agenda. Report 7.1.2 Costing Methodology of Annual CWMS Maintenance Fee. https://www.mid-murray.sa.gov.au/_data/assets/pdf_file/0016/530602/Notice-of-Meeting-and-Agenda-2-March-2020_new_links.pdf

2024/25 Annual Business Plan Extract

Due to the 2022/23 River Murray Flood, many of the schemes have experienced abnormally high expenditure costs that have materially reduced the individual scheme fund balances. While it is expected that a large percentage of the flood related expenditure will either be recovered by insurance claims or through the Local Government Disaster Recovery Fund, a portion of these repayments will occur during 2023/24 and 2024/25. In the interim it has been decided to increase

CWMS Schemes by 3.1% (February 2024 forecasted CPI by the Reserve Bank of Australia for CPI in 2024/25) until the last of the insurance and disaster claims are lodged and settled in 2024/25.

2025/26 Annual Business Plan Extract

Full Cost Attribution, which is a requirement of Section 11(3) of the Local Government (Financial Management) Regulations, and as per the recommendations of Council's external auditors, will be phased in across the next four years, commencing in the 2025/26 Financial Year.

It is estimated that this cost will be approximately \$39 per connection in 2025/26. The recovery of all budgeted operational costs, including in 2025/26 an additional 1.0 FTE CWMS Officer to support the maintenance and delivery of all of Council's CWMS, and the operational costs of a new trailer mounted Vacuum Excavator for the desludging, cleaning and flushing of rising and gravity mains (recommended to be performed every five years) will also occur. The estimated annual cost of \$111,000 will be approximately \$61 per connection in 2025/26.

Although considered, the proposed additional depreciation component will now not be incorporated into the 2025/26 CWMS Annual Service fee, with the implementation of a Capital Renewal Annuity cost component to be considered across the next 12-mths and introduced into the 2026/27 CWMS Annual Service fee based on the future capital renewal requirements of each individual scheme.

The financial impact of these actions in 2025/26 will result in an increase of approximately \$100 for the majority of the Council's CWMS schemes users. Truro and Cowirra Schemes fees have been recovering operating costs of the schemes, including depreciation, therefore these two schemes will only receive an approximate \$20 increase.

4. 2031/32 renewal works — existing capacity or increased capacity

The capital works information appears to show significant Five Mile/Kia Marina works in 2031/32, including renewal of a pump sump, a 57,000 litre IAT tank, a 22,000 litre balance tank, and trafficable lids x13.

Please confirm whether these works are:

1. like-for-like renewal of existing assets sized only for the current wastewater load; or
2. sized to provide additional capacity for Kia Marina, the commercial slipway, peak seasonal use, future connections, compliance buffers, growth, or other increased demand.

Please provide the design basis or capacity assessment for the 2031/32 works, including the assumed number of connections/property units, commercial load assumptions and any allowance for future growth or commercial use.

This is important because, if the works include capacity beyond existing residential demand, Council should explain how those costs have been allocated consistently with cost-reflective and user-pays pricing principles.

Infrastructure – To respond, under a separate email.

5. Charge calculation and phase-in path

Please provide the calculation showing how the proposed \$1,820 per unit charge was determined for Five Mile/Kia Marina, including:

1. the operating cost component; **Per Connection \$1,084**
2. the indirect/overhead cost component; **Per Connection \$196**
3. the capital renewal annuity component; **Per Connection \$5,945**
4. the uncapped calculated charge before the \$250 phase-in cap; and **\$5,945 Then phased by 5 years and capped at \$250.**
5. the expected charge path over the five-year phase-in period. **As the present model only looks at the next 10 years of Capital (ideally should possibly be looking at a longer period at least 15 years), the**

model would be recalculated on an annual basis on the rolling next 10 years (years 2 to 10 of the previous year plus year 11 previously). For many schemes there will not be sufficient funds accumulated to cover the scheduled capital, possible two alternative are that if it a minor deficit amount (forecast show that it will return to a surplus within a couple of years), no action required or if a material deficit a Capital contribution is called by the owners (with an option to repay over a period of years, including interest component).

Issues are :

Using an annuity method works well if the scheme has just been constructed, but in this situation, many are 20-25 years old.

The calculation hasn't taken into account the current Surplus/(Deficit) of each fund.

As the increased is phased/capped in the correct annuity amount is not being collected (earning interest).

Accuracy of future forecast capital expenditure vs actual expenditure.

This information is needed so affected ratepayers can understand the expected charge path and whether the proposed charge is transparent, cost-reflective and properly allocated between residential and commercial users.

Restraint due to the LG Unit Code, although Kelledy Jones letter mentioned using for a marina the unit charge based on the same principles of a caravan park.

No. Prop.		Operating Expense		Capital Expense	
		Operating Expense Budget 2026/27 Per Scheme	Operating Expense Budget 2026/27 Per Connection	Annual Annuity Capital requirement in 2026/27 for next 10 Years Per Scheme	Annual Annuity Capital requirement in 2026/27 for next 10 Years Per Connection

2025/26 Dollar based figures Capital Expenditure x AMP (Reprogrammed)					
Assumptions					
Year ending --->					
Australia CPI ----->					
Source CPI ----->					
RBA Estimated Cash Rate ----->					
Source Cash Rate ----->					
Earning on LGFA Deposits ----->					
Source LGFA Deposits ----->					
Interest Earned on Deposits for Annuity Calculation		4.10%			
2025/26 Dollar Based Figures					
Scheme	Asset Code	Asset Name	Year	Renewal	Upgr
5 Mile				359,000	
Total Index figures Balance with Total Indexed figures listed above					
Calculate Annuity of Indexed CapEx Figures		<u>Indexed</u>	<u>No. Years</u>	<u>Annuity Pmts</u>	
2027		-	1	-	
2028		-	2	-	
2029		7,560	3	7,259	
2030		28,783	4	27,072	
2031		-	5	-	
2032		288,446	6	260,265	

6. Treatment of contributed assets

Council's fact sheet states that the majority of CWMS assets were previously gifted to Council by private bodies, individual owners, shack associations and/or government grants.

Please confirm whether any Five Mile/Kia Marina CWMS assets were originally funded or contributed by shack owners, Kia Marina, the commercial slipway, developers, government grants or any other party.

If so, please explain how those contributed assets have been treated in the annuity model, including how Council has ensured that current users are not being charged again for capital that was previously contributed, except to the extent required for future renewal or replacement.

The Council commenced charging CWMS fees for this scheme in 2004/05, it is assumed that like the other schemes, that either freehold titles and/or planning/buildings approval would not be given on/adjacent to the flood plain without a CWMS scheme. This would require additional research into archives or Council meetings (paper research), unsure why this would be required or how it would contribute to the present decision making ?

An Annuity model is what ESCOSA requires when assets have been gifted, the alternative method is that depreciation expense is recovered as part of the annual service fee (Regulatory Asset Base approach). If gifted assets and the users were asked to pay in their annual charge depreciation from day 1 – then they would be paying double (depreciation value collected from day 1 and yet no capital renewal may not occur for the first 7-10 years, taking funds in advance of the requirement to renew).

ESCOSA also recommends other cost components to be recovered such as return on investment (ignored as I have deemed that all assets have been gifted) and an expense component for Risk (also ignored).

Table 1: Recovery of Capital Expenditure (applicable to drinking water and sewerage serv

Pricing principle	Description	Level of compliance
Principle 1: Cost recovery for new capital expenditure	Retailers are required to set water and sewerage service charges to achieve full cost recovery of: ▶ prudent and efficient capital expenditure and ▶ a return on capital. Future asset replacement costs must be set either through: ▶ depreciation of the asset base (Regulatory Asset Base approach) or ▶ a renewals annuity. ▶ To meet this principle, a retailer must: ▶ have undertaken a recent asset valuation, so the depreciation charge is sufficient to fund asset renewal; or ▶ if using a renewals annuity, have an Asset Management Plan (AMP) that specifies the prudent and efficient capital expenditure for renewing,	Fully-compliant – a retailer achieves full-cost recovery of prudent and efficient new capital expenditure through regular asset replacement, ensure the depreciation charge is appropriate, or has applied a renewals annuity using the capital expenditure forecasts from an AMP
		Partially-compliant – a retailer sets prices to achieve full-cost recovery of prudent and efficient new capital expenditure through the necessary tools (regulatory asset base approach etc) and is adjusting prices to achieve full-cost recovery in the future
		Non-compliant – a retailer does not achieve full-cost recovery of prudent and efficient new capital expenditure

Clive Hempel

Director, Corporate & Financial Services

Mid Murray Council | PO Box 28, Mannum SA 5238

T: 08 8569 0100

Email: [REDACTED]

Web: www.mid-murray.sa.gov.au



We acknowledge the Aboriginal and Torres Strait Islander peoples of Australia as the Traditional Custodians of the lands and waters on which we meet and work. We pay respect to Elders past and present, recognising their important and ongoing role and connection to this ancient and beautiful land. We are committed to working together on our reconciliation journey.

This email message is intended only for the addressee(s) and contains information which may be confidential and/or copyright. If you are not the intended recipient please do not read, save, forward, disclose, or copy the contents of this email. If this email has been sent to you in error, please notify the sender by reply email and delete this email and any copies or links to this email completely and immediately from your system. Opinions expressed in this email and any attachments are those of the sender and not necessarily the opinions of Mid Murray Council. No representation is made that this email is free of viruses. Virus scanning is recommended and is the responsibility of the recipient.

From: Kerry Rowlands [REDACTED]
Sent: Tuesday, 19 May 2026 8:58 PM
To: Mayor <mayor@mid-murray.sa.gov.au>; Cr Kevin Myers <crkmyers@mid-murray.sa.gov.au>; Cr Jen Davis <crjdavis@mid-murray.sa.gov.au>; Cr Geoff Barber <crgbarber@mid-murray.sa.gov.au>; Cr Roslyn Schultz <crrschultz@mid-murray.sa.gov.au>; Cr Georga Warhurst <crgwarhurst@mid-murray.sa.gov.au>; Cr Kirsty MacGregor <crkmacgregor@mid-murray.sa.gov.au>; Cr Mandy Toczek McPeake <crmtoczekmcpeake@mid-murray.sa.gov.au>; Cr Victoria Hammond <crvhammond@mid-murray.sa.gov.au>; Post Box <postbox@mid-murray.sa.gov.au>
Cc: Post Box <postbox@mid-murray.sa.gov.au>
Subject: Formal Submission and Request for Supporting Information — Five Miles/Kia Marina CWMS 2026/27 Charge

Good evening

Please find attached formal submission and request for supporting information for the Five Mile/Kia Marina CWMS 2026/27 charge.

Kind regards
Kerry Rowlands

Kerry Rowlands

Property: [REDACTED], Five Miles
(Postal: [REDACTED])

3 June 2026

Mr Ben Scales
Chief Executive Officer
Mid Murray Council
PO Box 28 Mannum SA 5238

By email: postbox@mid-murray.sa.gov.au

Cc:

Mayor Simone Bailey - mayor@mid-murray.sa.gov.au
Councillor Kevin Myers - crkmyers@mid-murray.sa.gov.au
Councillor Jen Davis - crjdavis@mid-murray.sa.gov.au
Councillor Geoff Barber - crgbarber@mid-murray.sa.gov.au
Councillor Roslyn Schultz - crrschultz@mid-murray.sa.gov.au
Councillor Georga Warhurst - crgwarhurst@mid-murray.sa.gov.au
Councillor Kirsty MacGregor - crkmacgregor@mid-murray.sa.gov.au
Councillor Mandy Toczec McPeake - crmtoczecmcpeake@mid-murray.sa.gov.au
Councillor Victoria Hammond - crvhammond@mid-murray.sa.gov.au
Mr Clive Hempel, Director Corporate and Financial Services - postbox@mid-murray.sa.gov.au

Dear Mr Scales,

Re: Addendum to formal submission — CWMS charges for 2026/27 (Five Mile / Kia Marina scheme)

Further to my formal submission of 31 May 2026, I am writing to add to Point 3, regarding whether the 2031/32 capital works are renewals or additional capacity.

I note the consultation period has closed. However, the information below was only provided to me by Council this week in response to a request I first made on 19 May and repeated on 31 May. My submission reserved the right to comment once that information was available, so I ask that this be received as part of my formal submission.

In its 1 June correspondence, Council has confirmed:

- the pump sump and trafficable lids are renewal works, to be replaced regardless of any proposed developments;
- the 57,000-litre IAT tank and 22,000-litre balance tank — a considerable portion of the cost — are a capacity item rather than a renewal, required if developments proceed, and that the developer/s would need to contribute; and
- this full capacity cost has been included in the annuity and forms part of the proposed 2026/27 charge.

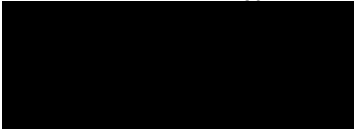
On Council's own confirmation, then, a growth-related capacity cost — driven by a prospective development, and one the developer is expected to contribute toward — is being recovered from the

scheme's existing ratepayers through the current charge. That does not appear consistent with the NWI and ESCOSA principles of user-pays, cost-reflective pricing, nor with Council's own Additional Connections Policy, which provides that existing landowners should not fund upgrades driven by new connections.

My concern is simply that the charge as calculated does not appear to be in line with those principles. I ask that Council review the charge so that ratepayers fund renewals sized for existing load, and that growth-related capacity is allocated to the demand driver rather than the existing customer base.

I make this submission constructively, in support of a sustainable scheme and a charge that meets ESCOSA and NWI principles. I remain happy to discuss.

Yours sincerely,

A solid black rectangular box used to redact the signature of Kerry Rowlands.

Kerry Rowlands

To: Chief Executive Officer
Mid Murray Council
PO Box 28
Mannum SA 5238

RE: Submission Opposing Proposed Changes to CWMS Charging Methodology – Five Miles CWMS

Dear Chief Executive Officer,

I write as a ratepayer and owner of a holiday home connected to the Five Miles Community Wastewater Management System (CWMS) to formally oppose the proposed changes to the CWMS charging methodology currently under consultation.

While I understand Council has obligations to ensure CWMS schemes remain financially sustainable and comply with regulatory requirements, I do not believe the information provided to ratepayers to date demonstrates sufficient transparency, fairness or justification for the proposed changes as they apply specifically to the Five Miles scheme.

My concerns are outlined below.

1. Five Miles Already Carries the Highest Financial Burden

Five Miles ratepayers are already paying the highest Annual Service Charge across all CWMS schemes.

Despite already carrying the highest ongoing charge burden, Council is now proposing that Five Miles residents also receive the highest annual increase of \$250 per year under the new charging framework.

This is particularly concerning given that Five Miles ratepayers have already experienced substantial annual increases over recent years. Based on available information, Five Miles residents have already paid average increases of approximately \$155 each year over the last six years.

This raises serious concerns regarding affordability, equity and proportionality. For many homeowners, these cumulative increases create an increasingly significant financial burden.

2. Equity Concerns – Commercial Connections within Five Miles

It is my understanding that the Five Miles scheme consists of 13 connections, of which two are commercial enterprises.

If this is correct, I question why commercial operations are contributing under the same residential charging structure as ordinary residential ratepayers.

Commercial premises often generate significantly different wastewater demand profiles and service requirements compared with residential properties. Applying identical charges to both

residential and commercial users appears inequitable and places a disproportionate burden on the remaining residential users of the scheme.

I request Council clarify the following:

- Are commercial premises within Five Miles currently charged under a differentiated commercial structure?
- If not, why not?
- Has Council assessed whether a commercial contribution model should apply?

For a small scheme with only 13 connections, the treatment of two commercial users may have a substantial impact on the overall financial burden borne by residential users now and in the future.

3. Existing Scheme Deficit

Some residents have recently become aware of an apparent accumulated deficit said to be in the vicinity of \$40,000 - \$50,000 associated with Five Miles.

This raises significant concerns.

To my knowledge, residents have never been formally advised that this deficit existed, when it arose or why it arose.

If ratepayers are now expected to absorb substantial fee increases due to historic deficits, there must be full transparency regarding how and why those deficits occurred.

I therefore request Council provide:

- the current accumulated surplus/deficit position for Five Miles;
- historical annual financial statements relating to the maintenance costs and material expenditure specific to the Five Miles scheme;

4. Flood-Related Expenditure and Recovery Funding

Given the widespread impacts of the 2022 River Murray flood event, I seek clarification regarding whether any component of the Five Miles financial position or expenditure relates to flood-related works.

Specifically:

- Did the Five Miles CWMS incur flood-related damage, emergency works or recovery expenditure?
- If so, what proportion of expenditure was directly attributable to flood impacts?
- Was an insurance claim lodged? And If not, why not?
- Was funding sought through State or Federal disaster recovery programs or Local Government recovery grants?
- If applications were made, what were the outcomes?

- If no applications were made, why not?

Ratepayers should not be expected to retrospectively fund disaster-related costs if external funding avenues were available.

I note Item 9.3, Attachment 1 of the Mid Murray Ordinary Council Meeting Agenda dated 19 May 2026 that states:

“The 2022–23 River Murray Flood had many of the schemes experience abnormally high expenditure costs, a large percentage of the flood related expenditure was settled in 2025/26 through insurance claims or the Local Government Disaster Recovery Fund.”

This statement raises important questions as to whether Five Miles was similarly impacted and whether all available cost recovery avenues were pursued.

5. Maintenance Costs - Asset Age - System Upgrades

Council has indicated that ageing infrastructure and future capital requirements are contributing to rising costs. However, no specific information appears to have been provided regarding Five Miles itself in relation to the actual age of the existing infrastructure and its maintenance costs, only future estimated material expenditure.

I request Council provide:

- annual maintenance costs specific to Five Miles over the previous ten years;
- scheduled maintenance expenditure;
- unscheduled maintenance expenditure;
- upgrade costs incurred;
- consultant costs; and
- internal administration or overhead allocations charged against the scheme.

It is difficult to understand why a small scheme such as Five Miles should experience disproportionately higher costs when larger CWMS systems with substantially greater numbers of connections, do not appear to experience equivalent cost escalation.

Why is Five Miles materially different to other areas? And why are larger schemes apparently able to manage maintenance and upgrade requirements without equivalent increases given their size and significantly higher usage?

Is Five Miles being disproportionately burdened due to its small connection base?

Residents should also be informed regarding the condition and remaining life of scheme infrastructure. Can you please advise on the age of the Five Miles CWMS system and the expected asset life of major components equipment and infrastructure.

Without this information, ratepayers cannot determine whether proposed expenditure is necessary now or could reasonably be staged further into the future.

Council has referenced future upgrade requirements and expenditure in their Rolling Capital Works Program, including implementation of remote systems and monitoring technology.

Can you provide clarity regarding the following:

- Is installation of the proposed remote system genuinely necessary?
- Is it driven by operational need or convenience?
- Will implementation reduce future maintenance costs?
- Are any measurable savings expected?
- If so, over what timeframe will residents see those savings?

If ratepayers are being asked to fund technological upgrades, Council should demonstrate clear evidence that these upgrades will deliver measurable financial benefits rather than simply shifting costs onto residents.

Before implementing any revised CWMS charging methodology, I respectfully request that Council address the matters raised above and provide all relevant information necessary for residents to properly assess the proposal.

Until such information is provided, I oppose implementation of the proposed charging changes as they relate to the Five Miles CWMS scheme.

I welcome the opportunity to discuss these concerns further, either in person or via correspondence. Please direct any correspondence to Kellie Carman via email at [REDACTED] or through the contact details provided below.

Yours faithfully,

Kellie Carman

[REDACTED]

Five Miles SA 5238

[REDACTED]

David & Nola Sadler

[REDACTED]

Five Miles SA 5238

[REDACTED]

Marco & Michelle Alfonso

[REDACTED]

Five Miles SA 5238

[REDACTED]

Tracy Bawden

From: Philippa Heath <[REDACTED]>
Sent: Sunday, 31 May 2026 6:15 PM
To: Post Box; postbox@midmurray.sa.gov.au; Philippa Heath
Subject: IEM9035-26 - 18/CON/SUR/20 - Proposed new methodology for Calculating CWMS charges for 2026/2027

Dear Mr Scales,

I am a ratepayer connected to the Five Mile / Kia Marina CWMS scheme at [REDACTED],
Younghusband.

The proposed increase for our scheme is too steep and falls unfairly on a small number of households. Before finalising the charge and the Long Term Financial Plan, I ask Council to address the following:

- Charge the marina and slipway fairly. They're each charged as one house. Assess them by the load they put on the system so residents aren't left covering the difference.
- Slow the recovery down. Spread the renewal cost over the full life of the equipment — don't load it onto today's 13 ratepayers over a few short years.
- Don't make us pay for an old deficit. The shortfall traces back to Council's 2017 decision to cut the marina from 12 charged connections to 1 and write off about \$20,200. That didn't just absorb a one-off cost — it stripped out the marina's share of scheme income every year since, leaving the rest of us covering the gap and the scheme in deficit (about \$30,200 at June 2025). Fix it going forward, so existing members aren't carrying a shortfall that didn't start with them.
- The 2031/32 works should reflect existing capacity. Under Council's own policy, renewals should replace what's there for current demand. We expect these works to be sized that way — and any cost for extra capacity to be charged to whoever drives that growth, not to residents.

Please treat this as a formal submission to the 2026/27 consultation.

Yours sincerely,

Darryl & Philippa Heath

[REDACTED]

[REDACTED]

Our CWMS charges are about to rise sharply

Mid Murray Council is consulting on a new way of calculating the annual wastewater (CWMS) service charge. It affects all of us connected to the Five Mile / Kia Marina scheme. This note explains what is proposed, why it hits our scheme particularly hard, and the concerns I've raised with Council. **Submissions close at noon on Monday 1 June 2026.**

I've already lodged a formal submission. If you share these concerns, the most useful thing you can do is send a short note to Council supporting it. A ready-to-use template is at the end of this briefing.

The short version

- Our charge is proposed to rise from **\$1,570** to **\$1,820** per connection next year — already the highest base charge of any Council scheme.
- That \$1,820 is only **the first of five yearly increases**, each capped at \$250. The cap hides a much bigger number underneath.
- Council's own figures show the full target charge for our scheme is about **\$5,945 per connection** — roughly **\$875 per year** of increase that the \$250 cap is staggering out over time.
- Ours is one of the smallest schemes (just 13 charged units), so a few decisions about who pays — especially the marina and the slipway — change every household's bill a lot.

Why our scheme is hit so hard

Two things are happening at once. First, Council is now adding costs to the charge that weren't fully included before — internal/overhead costs, and money set aside for future replacement of pumps, tanks and pipes (a "renewal annuity"). Second, our scheme has been running at a deficit for years, and the new method tries to clear that deficit at the same time.

Because there are only 13 charged connections in our scheme, there is no large group to spread these costs across. That's the core reason our increase is so steep compared with bigger schemes.

What the numbers look like

Item	Per connection	What it means
Charge in 2025/26	\$1,570	This year's bill
Proposed 2026/27	\$1,820	Year 1 of 5 (capped +\$250)
Full target charge	~\$5,945	Where the increases are heading
Annual increase under the cap	~\$875 (capped to \$250)	Cap slows it, doesn't remove it

Figures are from Council's own consultation material and its written answers to my questions.

My main concerns

1. The marina and slipway look under-charged — and we make up the difference

Charges are meant to follow a "user pays" idea: properties that put more load on the system should pay more. The marina (a houseboat hire fleet pumping out through our shared connection) and the slipway are each currently charged as if they were a single house.

There is a recognised method for charging larger or commercial premises as multiple units, which would mean they carry a bigger share — and every household's charge would be lower. I've asked Council to check whether the marina and slipway have been classified correctly.

Back in 2017, the marina was reduced from 12 charged connections down to 1 (which differed to their legal advice), and about \$20,200 in charges, fines and interest was written off. That write-off was absorbed by our scheme fund — in other words, by the rest of us — and the scheme has run a deficit ever since (around \$30,200 at June 2025). The new method now asks us to make good that shortfall.

2. Two development applications on the slipway property

Council has confirmed two development applications are lodged (not yet approved) over the slipway property at 723 East Front Road. If approved as proposed, they would add 8 dwellings — and Council says these would be charged as 8 units. That's the right treatment for new load. It also makes the point: if 8 new homes each warrant a unit, the existing commercial premises deserve a proper assessment too. And any system upgrade needed for those new homes should be paid for by the developer, not by us.

3. The renewal cost is being collected over too short a period

Setting money aside for future replacements is sensible. My concern is the speed. Council is recovering our scheme's renewal program over a comparatively short window, which front-loads the cost onto today's 13 ratepayers rather than spreading it fairly over the long life of the equipment. A longer recovery period would smooth the impact.

4. We haven't been given the detail behind the big 2031/32 works

A large set of works is planned for 2031/32 (a new pump sump and large tanks). I asked for the design basis so we can tell whether these simply replace what's there, or add extra capacity for future growth (the marina, the proposed dwellings, peak holiday use). If they add capacity for growth, that part shouldn't be paid for through our charges. Council hasn't provided this yet.

A note on the rules

None of this is about avoiding a fair charge. State pricing rules and Council's own policies broadly support full, fair cost recovery — and they also support charging by load, recovering costs over a reasonable period, and making sure the people who create extra demand pay for it. Those same principles are what I'm asking Council to apply properly here. You don't need to know the detail of the rules to support the submission — they point in our favour.

What I'm asking Council to do

- Re-check how the marina and slipway are classified and charged.
- Spread the renewal cost over a longer, fairer period.

- Fix the historic deficit going forward, so we're not left carrying a shortfall that didn't start with us.
- Release the design detail for the 2031/32 works, and charge any growth-related cost to whoever drives that growth.

How you can help

If you'd like to support the submission, please send Council a short note before **noon, Monday 1 June 2026**. You can use the template below — just add your name and property and send it to postbox@mid-murray.sa.gov.au. Even a few sentences helps; numbers of submissions matter.

Title your email: *Proposed new methodology for calculating CWMS charges for 2026/27*.

Happy to talk it through with anyone. — Kerry Rowlands, [REDACTED]
[REDACTED])

SHORT LETTER TEMPLATE — copy, fill in the blanks, and send

To: postbox@mid-murray.sa.gov.au

Subject: Proposed new methodology for calculating CWMS charges for 2026/27

Dear Mr Scales,

I am a ratepayer connected to the Five Mile / Kia Marina CWMS scheme at [your property address].

The proposed increase for our scheme is too steep and falls unfairly on a small number of households. Before finalising the charge and the Long Term Financial Plan, I ask Council to address the following:

- **Charge the marina and slipway fairly.** They're each charged as one house. Assess them by the load they put on the system so residents aren't left covering the difference.
- **Slow the recovery down.** Spread the renewal cost over the full life of the equipment — don't load it onto today's 13 ratepayers over a few short years.
- **Don't make us pay for an old deficit.** The shortfall traces back to Council's 2017 decision to cut the marina from 12 charged connections to 1 and write off about \$20,200. That didn't just absorb a one-off cost — it stripped out the marina's share of scheme income every year since, leaving the rest of us covering the gap and the scheme in deficit (about \$30,200 at June 2025). Fix it going forward, so existing members aren't carrying a shortfall that didn't start with them.
- **The 2031/32 works should reflect existing capacity.** Under Council's own policy, renewals should replace what's there for current demand. We expect these works to be sized that way — and any cost for extra capacity to be charged to whoever drives that growth, not to residents.

Please treat this as a formal submission to the 2026/27 consultation.

Yours sincerely,

[Your name]

[Your property address]

[Phone / email]



Scotts Creek Incorporated

Mid Murray Council
postbox@mid-murray.sa.gov.au
Attn: Mr Clive Hempel

Re: Proposed CWMS Pricing Methodology and 2026/27 Annual Service Charges

CWMS Properties: Scotts Creek, Morgan, SA 5320

Dear Clive,

Thank you for the information provided to date regarding the proposed CWMS system charges outlined in your correspondence dated 22 April 2026 and at the Arkaba Community Meeting on Wednesday 6th May 2026.

As offered, we would appreciate a copy of the following documentation:

- The detailed CWMS assessment prepared by consultant Rick Gaylor, as this information is essential to meaningful consultation and the preparation of an informed response.
- Evidence of Scotts Creek 'gifting' our CWMS to the Mid Murray Council as raised by Ben Scales at the Arkaba Presentation. Our current Scotts Creek Incorporated Committee are unaware of such action ever being undertaken.

Position of Scotts Creek Incorporated

Scotts Creek Incorporated, *representing 100 leaseholders*, formally opposes the proposed CWMS Annual Service Fee increases outlined in the *CWMS Annual Business Plan 2026/27 – Fact Sheet*. While we recognise Council's obligations under ESCOSA and the Local Government Act 1999, the proposed pricing structure is viewed as unnecessary, inequitable, and poorly timed, particularly given current cost-of-living pressures.

Our position is set out below.

Key Principles

- **Approval of capital works**
Any proposed or future capital works to our CWMS must be subject to prior approval by our association before acceptance or tendering.
- **Right to independent review**
Scotts Creek Incorporated reserves the right to obtain independent assessments and alternative quotations for any capital works.
- **Cost allocation fairness**
Our members will not accept responsibility for capital expenditure relating to infrastructure outside the Scotts Creek locality. Disproportionate costs arising from extended networks or low-density connections must not be subsidised by our ratepayers. It would appear that Scotts Creek Association are in a solid financial position and are being forced to cover broader CWMS costs across the Mid Murray Council.

Objections to Proposed Pricing Methodology

- **Disproportionate increase relative to CPI**
The proposed increase of approximately \$247 per connection significantly exceeds CPI and growth in household income. Even with a capped increase, the scale remains inconsistent with current economic conditions.
- **Retrospective cost recovery**
The proposal acknowledges historical under-recovery of costs. These shortfalls arose from past policy and financial decisions and should not be retrospectively imposed on current users.
- **Council financial accountability**
As a public authority, Council is responsible for prudent long-term financial planning. Accelerated cost recovery indicates deficiencies in prior planning and should not be rectified through sudden increases to ratepayers.
- **Current Financial Status of SCI**
Our view is that there should be no price increase based on our current financial position and Council's proposed capital expenditure for Scotts Creek over the next 10 years

Position on 2026/27 Fee Increase

Scotts Creek Incorporated acknowledges the proposed increase of approximately \$247 per connection to fund future capital requirements.

Considering our existing CWMS account is in surplus by \$60,000 and the proposed cost of upgrading/maintenance for Scotts Creek based on consultancy reports for the next decade is set at \$71,000, WE ARE UNWILLING TO SUPPORT THIS INCREASE. It is illogical and unfair that each leaseholder at Scotts Creek would be asked to contribute an additional \$247 annually to address this shortfall.

Requested Outcomes

1. Stop the proposed increases in their current form.
2. Align future increases with CPI or household income growth.
3. Align future increases based on the anticipated 10 year capital expenditure (As outlined in Mid Murray Council's 10 year Capital Expenditure Plan)
4. Absorb a portion of historical funding shortfalls within Council's broader financial framework.

Transparency Requirement

- We request that all capital contributions be clearly identified as a separate general ledger line item within CWMS financial reports and balance sheets.
- We would also support the re-establishment of the MMC CWMS committee with representatives from each association as this format enabled a proactive, effective and responsive approach to the management of the CWMS system.

Conclusion

While the proposal may achieve regulatory compliance, it is inequitable, economically disproportionate and poorly timed. Scotts Creek Incorporated urges Council to reconsider the proposed pricing methodology in full. SCOTTS CREEK ARE NOT IN FAVOUR OF THIS PROPOSAL IN ITS CURRENT FORM.

It is our intention to provide additional feedback once we have obtained a copy of the detailed CWMS assessment prepared by consultant Rick Gaylor.

Please contact us should you require further clarification of the points we have submitted in our correspondence.

Yours sincerely,



Paul Bennett per

Jim Johnstone
PRESIDENT

Scotts Creek Incorporated
scottscreekmorgam@gmail.com

31st May 2026



PURNONG, CAURNAMONT & DISTRICT PROGRESS ASSOCIATION INC

Response to

1. Community Wastewater Management Scheme Charge 2026/27

Members of the Association attended the public sessions explaining the rates calculation. From the briefing session the Association acknowledges the challenges and issues related to Council running 29 separate CWMS systems.

The Purnong, Caurnamont & District Progress Association originally facilitated the design, construction and ultimate gifting of the system to Council. The Association continues to represent the residence connected to the Caurnamont CWMS. The feedback is given on this basis.

The Association acknowledges the challenges with rate calculation for the large number of CWMS with variations in design, running costs and system component replacement.

Currently the Association is in discussion with Council to undertake an upgrade of the Caurnamont CWMS. The system is experiencing major failures during peak times, the result is extra expense on call-outs, high rate of tank pump failure and sewer leakage onto the flood plain.

To add to the complexity of a system upgrade, there are some land owners seeking subdivision, we believe this to potentially result in 10 extra connections. Recent information has indicated that the additional connections would require key upgrades to most of the existing system, e.g. enlarge collection tank, larger pumps, expanded irrigation and new sewer main pipes. It is our understanding that the land owners requiring the extra connects will incur all costs associated with the additional connections.

The Association also acknowledges that the CWMS annual fees collected do not ensure forward funding for capital works, upgrades etc. To enable the upgrade to proceed funding needs to be sourced, this funding will supplement existing funds collected for the Caurnamont CWMS.

From the documentation provided by Council and the information gathered at the briefing sessions the Association concludes the following:

1. The current funding/CWMS fees need to increase to cover running and basic maintenance costs.
2. The current funding is inadequate, and does not allow for depreciation or a funding path to system replacement.
3. The Caurnamont CWMS was gifted to Council, therefore the depreciation model and associated calculation is complex
4. Council is proposing an annuity-based depreciation model. This model takes into consideration the system will be at least 50% into its design life.
5. The CWMS rate calculation is open for discussion and maybe varied for each individual CWMS.



PURNONG, CAURNAMONT & DISTRICT PROGRESS ASSOCIATION INC

The rate calculation for the Caurnamont CWMS is complicated by the current situation:

1. The advent of the extra connections, the upgrade work associated with adding these connections and the funding require to undertake this
2. The current design and plan to undertake a major system upgrade to the existing system, this includes future proofing.
3. Low funding balance in the Caurnamont CWMS account.

The Association would like to propose the following:

1. Ensure that there is only one upgrade plan that covers the new connection and the existing system upgrade. (this will require a formal agreement from the land owners undertaking the sub division)
2. Planning and estimates are undertaken to determine the total cost, the cost for the new connections and the cost of the upgrade.
3. Explore the rates and additional funding required to fund the total project, the Association understand that existing residence may need to pay additional costs outside of the Annuity depreciation model.

The Association would propose meeting to discuss and agree the above and agree a rates calculation (including the Annuity amount) and any additional funds required to enable the project.

Dated 21st May 2025

To: Mid Murray Council

Email: postbox@mid-murray.sa.gov.au

Attn: Clive Hempel



Dear Clive,

Thank you for the information supplied to date in relation to our association providing our response on behalf of its 114 members to the CWMS system charges letter dated 22nd April 2026.

We note that several questions raised with Glenn Sanford remain unanswered. We have also requested, but not yet received, a copy of the detailed CWMS assessment prepared by consultant Rick Gaylor.

The Brenda Park Associations position is this on the Brenda Park/Morphett Flat CWMS proposal.

Any proposed or future capital works must be approved by our association before they are accepted and before tenders are issued.

- Our association reserves the right to seek alternate assessments and quotations for capital works.
- Our association and its ratepayers contributing to the CWMS will not incur capital cost expenditure that relates to the Morphett Flat side of this system. The Morphett Flat ratepayers piping infrastructure covers a long distance per connection and any capital works on the Morphett Flat side will be at a higher rate per connection than those allotments within Brenda Park. Brenda Park rate payers should not be further subsidising the disproportionate costs associated with Morphett Flat side.
- Our proposed annual charge for 2026/2027 has risen by \$250 from \$462 to \$712. It is our understanding that this \$250 increase is for future capital requirements, raising an additional \$33,250 per annum. We are in support of this increase as a once-off-only increase without further increase in subsequent 5 years.

#Note: We also wish to see the capital contribution appear as a separate GL line/column on the CWMS financial report/balance sheet.

Please contact us if you have any questions.

Kind Regards,

Adam Madrussani (Chair)

Mark Rademacher (Vice Chair)

Silvana Letts (Treasurer)

Kirstine Warneford (Secretary)

on behalf of Brenda Park Leaseholders Inc.

Email: brendaparksecretary@outlook.com or brenda_park@bigpond.com

Tracy Bawden

From: Steve Nico <[REDACTED]>
Sent: Monday, 1 June 2026 2:13 PM
To: Post Box
Subject: IEM9074-26 - 18/CON/SUR/20 - Closure of CWMS Consultation Page.

ATT: Clive Hempel

Hi,
Just a small complaint. It is a bit hard to reply to this public consultation when the site is supposed to be open till 11.59pm today, at now at 1.55pm, the site is closed!!!!

- Mid Murray Your Say feedback form;
- Letter addressed to the Chief Executive Officer, Mid Murray Council, PO Box 28, Mannum SA 5238; or
- Email postbox@mid-murray.sa.gov.au

Submissions will be received until 12:00 pm Monday 1 June 2026

Closed

🕒 Closed on 01/06/2026 at 11:59 pm

Feedback Form - Community Wastewater Management Scheme Charge 2026/27

Disclaimer - By submitting your information, you acknowledge and agree that your submission will be included in a council report. This report is a public document and may be accessed by members of the community. Please note that some contact information will be redacted to protect privacy.

No responses will be accepted without name and contact details

Do you wish to remain anonymous? Required

☐ Yes

☐ No

Next

Communit

📅 Wednesday 1
Adelaide – A
Each communi
book [here](#)

📅 Thursday 14
Mannum - M
Each communi
book [here](#)
This meeting w
click [here](#)

📅 Tuesday 19 I
Blanchetown
Each communi
book [here](#)

📧 Council consultation - s 📧 Closure of CWMS Const 📧 Mail - Steve Nico - Outl

We would just like to query the way that the 10 year proposed spends are worked out. Scott's Creek has in excess of \$60k in the account, with a proposed spend of \$70K for the \$10 years, yet the proposed rise in cost for this year is just shy of \$300.

There are numerous other sites that have far larger spends, but their base costs are far less and their proposed increases are sometimes as little as \$100, along with a smaller pool in the funds. W can provide examples if you require.

Also, in year 3, there are proposed replacements of 2 blowers at \$5500 each. They may be time expired, but will be still serviceable. – why noy 1 blower and keep the other as a spare?? Our personal pump chamber pump is in excess of 25 years old and still operational. There must be a better system

where a blower can be shared across several CWMS sites to avoid these exorbitant, extravagant and unnecessary costs.

We believe this has been ill thought out and needs to be revisited, with more public input.

Regards,
Stephen and Heather Nicolson
[REDACTED] Scott's Creek
Mob. [REDACTED]

Mid Murray Your Say

Feedback Form - Community Wastewater Management Scheme Charge 2026/27 Results

Apr 24, 2026 - May 30, 2026

Project: Community Wastewater Management Scheme Charge 2026/27

Form: Feedback Form - Community Wastewater Management Scheme Charge 2026/27

Tool Type: Form

Activity ID: 51

Exported: 2026-06-01 12:04:42

Exported By: NVivian

Filter By: No filters applied.

Q1 Do you wish to remain anonymous?

Multi Choice

No

Q2 First and Last Name

Short Text

Tim Wachtel

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

Marks Landing

Q4 Email

Email

[REDACTED]

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

Yes

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

Yes

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

Q9 Please provide any other comments on the proposal?

Long Text

Being a property owner who is connected to a CWMS, I fully understand that connected CWMS users must pay, as required, for maintenance, upkeep and programmed replacement to maintain a reliable fully functional system throughout the lifetime of the system. That said, it is critically essential that MMC establishes a lowest cost supplier base for all the components required in a CWMS. Connected CWMS users are at the mercy of MMC and the prices paid for these components. There is a view in the business world that all levels of Government do not always have the best purchasing power, which is why many Government projects are so hugely expensive. The MMC must establish the lowest cost base for all connected CWMS users, using all the options available, to achieve lowest supplier costs to MMC. It is often easier to stay with the same supplier base and not upset suppliers, however there is no longer a loyalty system in all transactions, there is now a loyalty tax to those who do not work alternative suppliers against each other. The lower the costs to MMC, the lower the cost to connected CWMS users.

Q1 Do you wish to remain anonymous?

Multi Choice

No

Q2 First and Last Name

Short Text

Mark Olson

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

South Punyelroo

Q4 Email

Email

president@sppai.org.au

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

No

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

The South Punyelroo Progress Association Committee does not support the methodology to the calculation of the annual CWMS charge and this is because, after some investigation and attempts to gain further information on the rationale behind the timelines for the requirement of repairs and major replacement, we have not been able to gain the required information from the Mid Murray Council. Therefore, due to the lack of information and the short time frame required for a response from a volunteer committee, we are unable to support the methodology. We are not opposed to being charged for the ongoing maintenance and repairs of the CWMS system but feel we need further information.

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

No

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

Once again, we have sought but have been unable to obtain the information that we need to make a rational, considered decision on this matter. The timeline alongside the lack of essential information makes it impossible for the SPPAi committee to seek feedback from our 100 members as without the required information and short timeline we are unable to undertake our own costings/valuations. We feel that any Major repairs or capital replacement work would not likely be the result of catastrophic failure but more likely be in planning for several months or even years, and once actual costs are known they could possibly be funded via a grant to be repaid over 5 years, in a similar manner to when the scheme was implemented.

Q9 Please provide any other comments on the proposal?

Long Text

The SPPAi committee understands that the CWMS is an essential system that will need ongoing maintenance and repairs which will come with cost. The SPPAi committee are simply trying to establish what/how the rationale is/was behind the costings and projected repair/replacement projections into the future before we could possibly circulate our considered opinion to our 100 site holders for their support or otherwise. It seems that there are some projected cost inclusions that are creating confusion and there are some (not inconsiderable) costs that have been recouped by the council through our rates. Should these costs then be shifted into a levy or ongoing upfront fee for service charges, would that then mean, as it should, that our rates would reduce accordingly? Once again, the SPPAi understands the MMC's requirement for a well considered/planned process for the CWMS, but once again, information and time are lacking in the current proposal. May I also say that this form is a different set up in the final form than it is as you work through it???

Response No:
3

Contribution ID: 830

Member ID:

Date Submitted: May 20, 2026, 09:11 AM

Q1 Do you wish to remain anonymous?

Multi Choice

Yes

Q2 First and Last Name

Short Text

[REDACTED]

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

pelican point

Q4 Email

Email

[REDACTED]

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

No

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

\$595 x 70 shacks = \$ 41650 per year i cant see where the maintenance of our water treatment system can cost this amount

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

No

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

when the system require ac capital upgrade our association president should be notified with a detailed estimate so as to be transparent

Q9 Please provide any other comments on the proposal?

Long Text

i am sick of seeing government organisations being ripped off blind because it is not there money

Response No:
4

Contribution ID: 828

Member ID:

Date Submitted: May 19, 2026, 08:17 AM

**##NOTE - DUE TO LACK OF INFORMATION THIS RESPONSE HAS NOT
BEEN CONSIDERED AS PART OF THE THE CONSULTATION**

Q1 Do you wish to remain anonymous?

Multi Choice

Yes

Q2 First and Last Name

Short Text

Y

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

T

Q4 Email

Email

[REDACTED]

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

No

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

Gghh

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

No

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

Ffg

Q9 Please provide any other comments on the proposal?

Long Text

Gtyy

Response No:
5

Contribution ID: 826

Member ID:

Date Submitted: May 06, 2026, 05:34 PM

Q1 Do you wish to remain anonymous?

Multi Choice

No

Q2 First and Last Name

Short Text

MARTIN AYLES

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

CWMS

Q4 Email

Email

[REDACTED]

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

No

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

As dictated at upcoming meeting - Extreme costs

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

Q9 Please provide any other comments on the proposal?

Long Text

Dictated at Meeting

Q1 Do you wish to remain anonymous?

Multi Choice

No

Q2 First and Last Name

Short Text

Ian Brown

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

Pelican Point

Q4 Email

Email

[REDACTED]

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

No

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

We do not support any increase due to the existing rates being charged seems exorbitant for the services we receive, ie no individual bin collection or recycling option, no sealed road, lack of maintenance to the road, no street lighting etc.
I would have thought any increased cost in maintaining the steds system would come from what we already pay. When system was installed the Council agreed to seal the dirt road from Murraylands Rd to the holding tanks, this never happened & now our association have told us that the council have lost all correspondence on this matter, other shack areas local to us have sealed roads.
It would be good to see an actual breakdown of the costs of maintenance of the system to ensure what we pay is actually being used & not just supporting other council projects.
Just because we own a holiday home doesn't mean we are cashed up & can keep up with large increases. Inflation is around 5%, how do you justify a 40% increase?

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

No

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

We do not support any increase due to the existing rates being charged seems exorbitant for the services we receive, ie no individual bin collection or recycling option, no sealed road, lack of maintenance to the road, no street lighting etc.
I would have thought any increased cost in maintaining the steds system would come from what we already pay. When system was installed the Council agreed to seal the dirt road from Murraylands Rd to the holding tanks, this never happened & now our association have told us that the council have lost all correspondence on this matter, other shack areas local to us have sealed roads.
It would be good to see an actual breakdown of the costs of maintenance of the system to ensure what we pay is actually being used & not just supporting other council projects.
Just because we own a holiday home doesn't mean we are cashed up & can keep up with large increases. Inflation is around 5%, how do you justify a 40% increase?

Q9 Please provide any other comments on the proposal?

Long Text

We do not support any increase due to the existing rates being charged seems exorbitant for the services we receive, ie no individual bin collection or recycling option, no sealed road, lack of maintenance to the road, no street lighting etc.
I would have thought any increased cost in maintaining the steds system would come from what we already pay. When system was installed the Council agreed to seal the dirt road from Murraylands Rd to the holding tanks, this never happened & now our association have told us that the council have lost all correspondence on this matter, other shack areas local to us have sealed roads.
It would be good to see an actual breakdown of the costs of maintenance of the system to ensure what we pay is

actually being used & not just supporting other council projects.
Just because we own a holiday home doesn't mean we are cashed up & can keep up with large increases.
Inflation is around 5%, how do you justify a 40% increase?

Q1 Do you wish to remain anonymous?

Multi Choice

No

Q2 First and Last Name

Short Text

Alex Nikolić

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

Cowirra

Q4 Email

Email

[REDACTED]

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

No

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

\$719 a year for 55 property units in Cowirra comes to \$39,545.00 a year and \$395,450.00 over 10 years for a capital expenditure over 10 years being \$46,218.00. That calculation does NOT include yearly increases to the rate! The proposal talks about fees being based on operational costs and annual depreciation expense. Annual depreciation costs are unfair and not valid! It means "Annual depreciation expense is the yearly cost allocated to a tangible asset over its useful life, calculated to reflect wear and tear. This non-cash expense reduces taxable income and spreads the asset's cost across accounting periods, rather than recording it all upfront." It's used as a tax break for council, the only wear and tear would be the pumps and what is its life expectancy? We need to ask as well that we are paying \$1000 above the rates currently to cover the cost of the installation of the scheme for the next 4 years, even though it was heavily funded by State Government Grants! It needs to be explained better why these costs are there and you need to enforce all connections. There are many still not connected after the 2 year grace period! Also connecting to the scheme cost many \$10,000.00 plus with new septs and associated costs!

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

No

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

As stated we have already or are paying over a thousand dollars extra on our rates to cover the installation of the scheme. It was heavily subsidised by government grants. We need projected service costs, all residents connected and then come to an acceptable cost!

Q9 Please provide any other comments on the proposal?

Long Text

Response No:
8

Contribution ID: 820

Member ID:

Date Submitted: Apr 24, 2026, 10:38 AM

Q1 Do you wish to remain anonymous?

Multi Choice

No

Q2 First and Last Name

Short Text

Peter mcintyre

Q3 CWMS Scheme Location (or town if not a CWMS user)

Short Text

Bowhill

Q4 Email

Email

[REDACTED]

Q5 Do you support the proposed methodology changes to the calculation of the annual CWMS charges to ensure that your scheme has adequate funds to perform future maintenance, repairs and major replacement to the CWMS as required?

Multi Choice

No

Q6 If you do not support the proposed methodology changes, please provide feedback on why?

Long Text

Unaffordable for ratepayers

Q7 Do you support the proposed increase of the annual charge for your scheme?

Multi Choice

No

Q8 If you do not support the increase in the annual charge, how do you propose that the schemes should be funded to cover any capital investment that is required?

Long Text

Council savings

Q9 Please provide any other comments on the proposal?

Long Text

No