Trade Waste Policy Guidelines

[Head of Treatment, October 2026]

Responsible group or department	
Document Owner	Head of Treatment
Approved by	Managing Director
Compliance	Barwon Water Employees
First created	June 2023
Last updated	October 2026 (off-cycle update)
Next review	June 2028
Document Review Cycle	3 years, in alignment with Trade Waste Policy
Version	V3
ECM Reference	A37579235

Revision History

Version	Date	Contact	Description of Amendments	Communication Method
V1	2023, June 30	Head of Asset, Systems, & Environment	Document creation (replacing the previous Trade Waste Management Policy) in combination with the Trade Waste Policy. To align with current legislative obligations and business strategic objectives.	Website / Email
V2	2025, June 30	Head of Treatment	Updated references to reflect the revoked *Water (Trade Waste) Regulations 2014* now captured in *Water (General) Amendment Regulations* 2025. Updated definitions of Trade Waste and Ordinary Domestic Waste as per *Water (General) Amendment Regulations* 2025. Updated sections 11.2.1 and 11.2.2 to include reference to updated Conditions of Trade Waste Agreements, Section 7 Clause 32 of *Water (General) Amendment Regulations* 2025.	Website/Email
V3	2026, October 13	Head of Treatment	Update of Section 7.2 – Prohibited Substances, to include alkaline hydrolysis of human or animal remains (also known as aquamation or water cremation).	Website/Email

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1 Policy Statement

This document is Barwon Water's guidelines for the acceptance and management of Trade Waste discharged to Barwon Water's Sewers. This is a supporting document to, and designed to be read in conjunction with, Barwon Water's Trade Waste Policy.

The policy and guidelines apply throughout all of Barwon Water's Sewerage Districts and anywhere outside of its districts where it accepts Trade Waste. The policy and guidelines are incorporated by reference as part of every Trade Waste Agreement or Permit.

2 Scope

2.1 Barwon Water

Barwon Water is a major waste management operator with a critical role in ensuring the sewerage system is environmentally and economically sustainable while aiming to maintain an excellent level of service to customers.

Barwon Water advocates the Environment Protection Authority's industrial waste minimisation initiative. Through the Victorian *Water Act 1989* (the Act), the *Water (General) Amendment Regulations 2025* (the Trade Waste Regulations), Trade Waste Policy, Trade Waste Agreements and Trade Waste Permits, Barwon Water encourages waste avoidance, reduction, recycling, treatment, and disposal.

2.2 Barwon Water Strategy 2030

Barwon Water's approach to the management of commercial trade waste is supported by Barwon Water Strategy 2030, placing regional prosperity at the core of our aspirational goals.

The four aspirational goals are:

- Safe, secure, sustainable water.
- Innovative, reliable services.
- Healthier environment.
- Trust, value and affordability.

More information can be found on the Strategy 2030 - Barwon Water page on the Barwon Water Website.

3 Purpose

Barwon Water is committed to working cooperatively with Persons discharging Trade Waste into its sewerage system to achieve the objectives of the Trade Waste Policy and its Strategy 2030.

This document outlines the following:

- When and how to apply for a Trade Waste Agreement or Trade Waste Permit.
- Rights and obligations under a Trade Waste Agreement or a Trade Waste Permit.
- Barwon Water's Trade Waste powers and obligations under the *Water Act 1989*, and the Trade Waste Regulations.
- The consequences of discharging Trade Waste without a valid Trade Waste Agreement or Trade Waste Permit.
- The consequences of breaching the terms of a Trade Waste Agreement, a Trade Waste Permit, or breaching the Act.
- The fees and charges levied by Barwon Water in connection with the acceptance and management of Trade Waste (including how these fees and charges may be varied).
- The circumstances in which Barwon Water may exempt a Person from some or all these Trade Waste requirements.

Definitions

Term	Description
Acceptance Criteria	The Acceptance Criteria formulated by Barwon Water from time-to-time under the Trade Waste Policy is adopted by Barwon Water and approved by the Essential Services Commission (ESC).
Act	The Water Act 1989 as amended or replaced from time-to-time.
Agreement	A Trade Waste Agreement
Application	An applicationfor a Trade Waste Agreement or Trade Waste Permit and includes both kinds of Applications where the context so allows.
Corporation	Barwon Region Water Corporation (Barwon Water).
Discharge Point	The point of discharge to the Sewer described in the Permit or Agreement Schedule.
Drain	Includes a pipe or other conduit, for the passage of Ordinary Domestic Waste or Trade Waste discharges from any Property to any Sewer.
Measurement Standards	The standards for the measurement of Trade Waste as formulated by Barwon Water from time to time under the Trade Waste Policy.
Modified Acceptance Criteria	Variations to the Acceptance Criteria that may be permitted and imposed by Barwon Water in a Trade Waste Agreement.
Occupier	The Person who is the Occupier of the Premises and a customer of Barwon Water who enters into a Trade Waste Agreement with Barwon Water.
Occupier	in relation to: - any Premises, includes any Person who is in occupation or control of the Property, or - Premises where different parts are occupied by different Persons, include the respective Persons in occupation or control of each part, whether that Person has a proprietary interest in the Property.
Ordinary Domestic Waste	Means sewage as defined in the *Water Act 1989* (Vic) which is discharged from private residences, excluding Trade Waste.
Penalty Unit	A 'penalty unit' within the meaning of the Sentencing Act 1991.
Permit	A Trade Waste Permit.
Person	As defined in the Act.
Premises	The part of a property or building from which the Trade Waste is produced and may be discharged.
Price Determination	The price determination determined by the ESC that applies from time-to-time to Barwon Water.
Property	Includes the whole or part of: - any land, or waterway, including a lot on a plan of sub-division, - any residential, commercial and non-residential buildings and buildings under construction, and - where the context so permits, includes any mobile and any immobile vehicle or vessel.
Receiving Station	A receiving station operated under the control and supervision of Barwon Water for purposes that include receiving Ordinary Domestic Waste or Trade Waste.
Regulation	Any Trade Waste regulation made pursuant to the Act.

Sewer	Any pipe, channel, tunnel or other conduit which is constructed or provided for the conveyance of Ordinary Domestic Waste or Trade Waste and is vested in or owned by Barwon Water.
Sewerage District	Every present and future area specified under the Act or by Order of the Minister under the Act to be a Sewerage District of Barwon Water.
Trade Waste	Means matter or waste matter as defined in the *Water (General) Amendment Regulations 2025* (Vic), excluding Ordinary Domestic Waste.
Trade Waste Officer	A person employed by Barwon Water to facilitate the implementation of the Trade Waste Policy & Guidelines.
Trade Waste Agreement	An agreement to discharge Trade Waste under the Act and includes the following:
Trade Waste Policy	The Barwon Water's Trade Waste policies are from time to time as adopted under the Act.
Trade Waste Permit	A permit issued to a Person by Barwon Water in relation to the discharge of Trade Waste.
Water	Water, regardless of if it contains impurities or not.

4 What is Trade Waste

The term 'Trade Waste' has a specific legal meaning for the purposes of the Act, the Trade Waste Policy, Trade Waste Agreements, Trade Waste Permits, and this document.

In general terms, Trade Waste is the wastewater that is discharged to a Sewer from commercial and industrial processes, which can contain substances used in or generated by manufacturing, processing, or food preparation activities.

Trade Waste does not include Ordinary Domestic Waste, such as waste matter from residential Premises (e.g. kitchens, toilets, or bathrooms).

The specific definition of Trade Waste is provided under section 5 "Trade Waste for the purposes of the Act" of the *Water (General) Amendment Regulations 2025*.

Unless they are controlled, Trade Waste discharges can put great stress on the sewerage system and can cause serious problems to public health, the environment, Barwon Water personnel, water reclamation plants and other sewerage infrastructure.

Trade Waste management aims to prevent and to manage problems that can occur when Trade Wastes are discharged into sewerage systems.

5 Our Legal, Regulatory, and Management Framework

5.1 Water Act 1989

Barwon Water is a statutory corporation with water supply and sewerage responsibilities conferred on it by the Act, including by Parts 8 and 9 of the Act.

Section 173 of the Act empowers Barwon Water to accept Trade Waste if it so decides. It is an offence under section 178 of the Act for any Person to discharge Trade Waste to the sewerage system other than in accordance with a Trade Waste Agreement or a Trade Waste Permit.

5.2 Trade Waste Regulations

Regulations can be made under the Act. Currently the *Water (General) Amendment Regulations 2025* apply. Regulations can do such things as:

Define what types of matter constitute Trade Waste; and specify rights in relation to disconnection, for example, in emergencies.

5.3 Environment Protection Act 2017

The management of trade waste is consistent with Barwon Water's obligations under the Environmental Protection Act 2017.

In line with our General Environmental Duty, Barwon Water recognises that trade waste presents a potential source of current and emerging contaminants into our network and has been proactive in keeping abreast of the latest developments in research and guidance. To support this, Barwon Water continues to grow our knowledge regarding current and emerging contaminants in trade waste to ensure these do not present a risk to our end products and their receptors and/or the environment.

Barwon Water's Emerging Contaminants Strategy considers the potential for emerging contaminants to be discharged through trade waste streams.

5.4 Customer Code and Customer Charter

The Act allows for the Essential Services Commission (ESC) to regulate the actions of Barwon Water relating to Trade Waste. This includes:

- a statewide Customer Code for Trade Waste; and
- a Barwon Water-specific Customer Charter.

The ESC also regulates:

- the adoption and variation to Trade Waste Acceptance Criteria;
- fees and charges through Barwon Water's Price Determination.

5.5 Trade Waste Policy & Guidelines

All Persons who discharge Trade Waste in Barwon Water's Sewerage District are required to comply with the Trade Waste Policy and these supporting Guidelines. Any Person who does not comply may be prosecuted for an offence under the Act

5.6 Trade Waste Discharge Consent

Barwon Water's Trade Waste Policy Guidelines requires every Person who discharges Trade Waste into the sewerage system or at a Receiving Station to obtain Barwon Water's consent by entering into a Trade Waste Agreement, obtaining a Trade Waste Permit, or being deemed to hold a Trade Waste Permit.

6 Obtaining Barwon Water's consent for the Discharge of Trade Waste

6.1 Customer Categories

Barwon Water defines Trade Waste customers in three distinct groups:

- **Deemed Trade Waste Customers:** Persons who are deemed to hold a Trade Waste Permit
- **Minor Trade Waste Customers:** Persons (generally commercial businesses) who are required to hold a Trade Waste Permit before discharging Trade Waste, and
- **Major Trade Waste Customers:** Persons (generally industrial businesses), who are required to hold a Trade Waste Agreement before discharging Trade Waste.

6.1.1 Deemed Trade Waste Customers

Persons whose business(es) are wholly described by one or more of the business descriptions in Table 6-1 are deemed to hold a Trade Waste Permit if they do not also satisfy one of the descriptions in Table 6-2 and continue to satisfy one of the descriptions set out in Table 6-1.

Table 1: Deemed Consents

Deemed businesses and activities	Exclusions (i.e., must have Agreement or Permit)
Beautician/Hairdresser	(Not applicable)
Chemist/Pharmacy	Those with emulsion photo film processing
Dental surgery	Those with x-ray processing and plaster setting
Doctor surgery	Those with x-ray processing and plaster setting
Mobile food van	Those with a purpose-built kitchen at a permanent location
Optician	(Not applicable)

Retail florist	(Not applicable)
Retail fruit and vegetable	(Not applicable)
Retail pet shop	Those with kennel wash down areas
Veterinary and animal clinic	Those with kennel wash down areas and x-ray processing

6.1.2 Minor Trade Waste Customers

A Person whose business is listed in Table 1 must, unless otherwise notified by Barwon Water, obtain a Trade Waste Permit for consent to discharge Trade Waste to Barwon Water's sewerage system.

Table 2: Trade Waste Permit Applicants

Trade Waste Permit Applications	
Food Preparation	
• Bakeries • Boarding Houses (Bed & Breakfast) • Butchers • Cafeterias / Canteens • Clubs with hot food preparation • Coffee / Sandwich Shops • Commercial Kitchens • Community Halls • Delicatessens • Donuts – in standalone shops, bakeries or bread shops • Function centres	• Garbage washes • Hot takeaway foods • Hotels / Motels • Hot bread kitchens • Ice Cream Parlours • Hospitals • Restaurants • Receptions • Takeaways • Schools – food technology rooms
Petrol, oil, and grease	
• Auto Wreckers • Car Detailing • Engine / Gearbox Reconditioning • Lawn Mower Repairs • Mechanical Workshops	• Panel Beating / Spray Painting • Radiator Repairs • Service Stations • Vehicle Washing
Chemicals, paint	
• Laboratories • School Laboratories • Screen Printers	• TAFE / School Workshops • Maintenance Workshops
Photographic, X- ray	
• Photographic	• X-ray and radiation devices (including photo processing, dental, medical practices)

Other	
▯ Boilers ▯ Building services (air conditioning) ▯ Drycleaners ▯ Fish – fresh (retail store) ▯ Hobby Clubs / Crafts	▯ Kennels ▯ Laundromats ▯ Morgues ▯ Municipal pools ▯ Specialist doctors (plaster)

6.1.3 Major Trade Waste Customers

A Person whose business is not listed in Table 1 or Table 2, unless notified otherwise by Barwon Water, obtain a Trade Waste Agreement for consent to discharge Trade Waste to Barwon Water's sewerage system.

6.2 Trade Waste Agreements and Permits

Barwon Water provides its consent to the discharge of Trade Waste by requiring the relevant Person to enter into a Trade Waste Permit or a Trade Waste Agreement. For the purposes of this Trade Waste Policy and Regulation, references to Trade Waste Agreements are taken to include references to Trade Waste Permits.

Barwon Water also provides a general consent to the discharge of Trade Waste by deeming certain Persons to have applied for and received consent to discharge certain types and volumes of Trade Waste. Barwon Water may from time-to-time add to or otherwise amend these categories of approved Trade Waste discharges.

Except as provided in section 6.1.1 of this document, it is illegal to discharge Trade Waste to Sewer without the written consent of Barwon Water. Any Person wishing to discharge Trade Waste to Sewer must make Application to Barwon Water for approval.

Barwon Water may require a Trade Waste customer to undergo an independent audit of its manufacturing and industrial processes and Trade Waste streams before entering, or renewing, or during the term of a Trade Waste Agreement. The Trade Waste Policy prohibits the discharge of substances that have the potential to damage the environment, the sewerage system, the treatment processes, or public health.

6.3 Applying for your Trade Waste Agreement or Permit

Subject to section 6.1, Barwon Water's written consent to discharge Trade Waste to Sewer will only be given following evaluation of an application for a Trade Waste Agreement or a Trade Waste Permit.

The information Barwon Water requires will be dependent on the type of business and the nature and volume of the Trade Waste to be discharged to Sewer. An Agreement or Permit must be issued prior to commencement of any discharge.

Examples of appropriate times for lodging Applications may include:

- During the processing of a building application for new Premises or extensions intended for industrial and/or commercial usage
- When there is a change in tenancy of such Premises.
- When there is a change of ownership of such Premises.
- When there is shop fit outs of such Premises.
- During the processing of an application to strata title such Premises
- Existing Premises where Trade Waste is generated and no Trade Waste approval has been issued, or
- Where a change in process technology occurs.

6.4 Submitting your application

The process for application is determined by the applicable customer category (as described under section 6.1).

6.4.1 Deemed Trade Waste Customers

A customer that is deemed to hold a Trade Waste Permit as described under section 6.1.1 is not required to submit an application or notification to Barwon Water.

6.4.2 Minor Trade Waste Customers

A customer that is required to obtain a Trade Waste Permit as described under section 6 must submit a Trade Waste Permit application form.

6.4.3 Major Trade Waste Customers

A customer that is required to obtain a Trade Waste Agreement as described under section 6.1.3 must contact Barwon Water's Resource Recovery and Customer Relations Team.

6.4.4 Help with submitting your application

For more information or advice on determining your customer category, or completing a form, please contact us.

6.5 Evaluation of the application

When Barwon Water has received the application, it will consider the risk associated with accepting the type of Trade Waste proposed into the sewerage system.

This evaluation will consider:

- The possible impact on the health and wellbeing of the workers in or around the sewerage system.
- The impact or possible effect on the sewerage system.
- Any effect or potential impact of the waste on the water reclamation plant process.
- Any possible detrimental environmental impact.

- The likelihood that the trade waste discharge may contain emerging contaminants of concern.

Having regard to the level of impact or effect contemplated above, the Trade Waste may not be accepted into the sewerage system. Consideration will be given to various matters including:

- Whether the proposed Trade Waste will meet the Acceptance Criteria or Modified Acceptance Criteria.
- The volumes of water to be provided by Barwon Water and the quantity of Trade Waste and sewage to be discharged.

A Trade Waste Officer may be in contact with the customer and may wish to conduct a site visit prior to granting consent to discharge Trade Waste to Barwon Water's sewerage system.

If this is a new business or the business has changed significantly, there may also be a need to pay developer charges (not covered in this document. For information on developer charges, contact Barwon Water).

When Barwon Water has assessed the Application and is satisfied that the Trade Waste discharged from the Premises is able to meet the required conditions, a Trade Waste Permit or a Trade Waste Agreement will be issued having consideration for the nature and quality of the Trade Waste.

6.6 Interim Trade Waste Agreement

Where considered appropriate, Barwon Water may issue a new business with a short-term consent to discharge Trade Waste to Sewer through an interim Trade Waste Agreement. This interim agreement is valid for a fixed term with the intention to allow Barwon Water and the Occupier to gather sufficient information for the negotiation of the long-term agreement.

6.7 Trade Waste Agreement Renewal

Where a customer has a Trade Waste Agreement in place for a fixed term, Barwon Water will initiate a process of renewal prior to the expiry of the existing Trade Waste Agreement.

The customer will be provided with a copy of a new Trade Waste Agreement for a subsequent term, to commence at the end of the existing agreement term. The customer will be required to confirm the accuracy and currency of all items within the agreement and advise of any changes applicable. Barwon Water may request additional information to support the development of a new Trade Waste Agreement. The renewal process may include the renegotiation of Acceptance Criteria levels (as per section 7.1).

Until such a time as the renewal process is complete and a new Trade Waste Agreement has been issued and executed by all parties, the terms and conditions of the existing Trade Waste Agreement will continue to apply unless the customer ceases discharge of Trade Waste. This is regardless of the specified Term in the existing agreement.

If a new Trade Waste Agreement has not been successfully executed by the customer beyond 30 days from the expiry date of an existing agreement, unless otherwise mutually agreed, Barwon Water may issue an unpermitted discharge contravention charge.

7 Trade Waste Permit and Agreement Conditions,

7.1 Acceptance Criteria

The Acceptance Criteria sets out the permissible levels of the physical and chemical characteristics for categories of Trade Waste; these are approved by the ESC. Refer to Barwon Water's Acceptance Criteria for more information and standard limits. Modified Acceptance Criteria may be adopted for Premises and Trade Waste discharges, in which case these are set out in the relevant Trade Waste Agreement or Permit.

These permissible levels have been set considering local considerations. Each pollutant has been evaluated for its impact on the receiving water quality, sludge quality and treatment process. They are based on the following:

- *Exposure standards based on WorkSafe Australia Standards for Atmospheric Contaminants in the Occupational Environment (April 1997). The exposure standards listed in the National Exposure Standards (NOHSC:1003 (1995)) represent airborne concentrations of individual chemical substances which should neither impair the health of nor cause undue discomfort to nearly all workers.*
- *Explosive limits based on 5% LEL (lower explosive limit).*
- *Environment Protection Authority licence requirements for water reclamation plant discharge limits.*
- *Environment Protection Authority Guidelines for Use of Reclaimed Water (June 2003).*
- *Environment Protection Authority Guidelines for Environmental Management: Biosolids Land Application (April 2004).*
- *Barwon Water's odour and corrosion strategy.*
- *Inhibition to the water reclamation plant nitrification process*
- *Environment Protection Authority State Environment Protection Policy – Waters of Victoria (June 2003).*

Barwon Water may on Application by a Trade Waste customer exempt that customer from certain Acceptance Criteria on such additional terms and conditions as Barwon Water considers appropriate.

7.2 Prohibited Substances

The customer must not discharge trade waste containing any substance not otherwise mentioned in this schedule unless specifically authorised under a Trade Waste Agreement.

The following substances must not be discharged:

- Fibrous material that, in the opinion of Barwon Water, is likely to cause obstructions in a drain or Sewer.
- Any free or floating layer of oil, fat or grease.
- Any free or floating layer of organic liquid
- Latex, paint, adhesives, rubber and plastic.
- Flammable and/or explosive substances unless the customer has demonstrated to the satisfaction of the Authority that there is no possibility of explosion or fires occurring in the sewerage system. In all cases, the Trade Waste discharge must not exceed 5% of the lower explosive limit at 25 °C.
- Medical, clinical, surgery, veterinary, laboratory, or other pathological waste, or required to be rendered non-infectious prior to discharge if they are deemed to be a threat to the health and safety of operations and maintenance personnel or the community.
- Any genetically engineered organisms and/or mutant bacteria.
- Wastewater and other by-products generated from the alkaline hydrolysis process (in other words, the breakdown of human or animal remains using alkaline solutions at elevated temperatures and pH) are not permitted to be discharged to Barwon Water's sewerage system. Barwon Water will not approve Trade Waste Agreements, Trade Waste Permits or sewer connections associated with these facilities.

7.3 Monitoring

The customer must monitor Trade Waste discharged to Sewer according to the terms and conditions specified in the Trade Waste Agreement or Permit.

The sampling of Trade Waste should recognise practical limitations and be at a location that excludes the Ordinary Domestic Waste generated on site.

7.3.1 Trade Waste volume

The rate of discharge and the volume of Trade Waste discharged to Sewer will be determined using one of the following methods:

1. Using flow metering equipment which accurately measures and records the waste being discharged. The customer shall pay all costs for this monitoring equipment. It may also be a requirement to make this information available on Barwon Water's telemetry system; or

2. Using flow metering equipment that is approved by a Trade Waste Officer for measuring the supply of water to the Premises. A percentage of the incoming water may be determined to be Trade Waste; or
3. By any other method approved by a Trade Waste Officer.

The customer may be required to install flow measuring equipment and instrumentation to measure and record the waste volume discharged to the sewerage system for charging and compliance monitoring purposes. Any discharge of Trade Waste that is greater than 10 kilolitres per day will require the installation of an accurate flow measuring device. The instrumentation shall record the flow on a continuous basis and a non-resettable totaliser reading in kilolitres must be provided. Barwon Water is responsible for trade waste flow metering calibration.

7.3.2 Trade Waste Quality

Barwon Water's Trade Waste Officers or appointed contractors may inspect Premises and conduct Trade Waste sampling and measurement at a frequency determined by the Trade Waste Officer (typically monthly for Trade Waste Agreements, typically not required for Trade Waste Permits).

Sites that may have irregular or infrequent discharge may be permitted to conduct their own Trade Waste sampling for collection by Barwon Water's contractor, this arrangement is subject to discussion and approval by the Trade Waste Officer.

Trade Waste samples are collected and sent to a National Association of Testing Authorities (NATA) registered laboratory where a series of analyses are made on the effluent. These results are then compared to the Acceptance Criteria as specified in the Trade Waste Agreement.

Refer to our Acceptance Criteria web page for details.

These samples may be collected using either manual or automatic equipment:

- Manual sampling may consist of a sample bucket or pump that is lowered down into the sampling point and held in the flow until full. This is then transferred to a sample jar (bottle).
- Automatic sampling is carried out with an automatic sampler. The sampler can be programmed to take samples either at equal times or flow intervals (flow proportional) and designed to collect samples over a predetermined period.

Where necessary the Trade Waste discharge to Sewer may need to be continuously monitored and recorded, and this information will need to be made available to an *Officer* on request.

Monitoring of the parameters could include (but is not limited to):

- pH

- temperature
- electrical conductivity
- turbidity

Barwon Water may also require that this information is made available (at the Occupier's expense) on a continuous basis, using telemetry to provide real-time data, at Barwon Water offices.

7.3.3 Self-monitoring

An Occupier may be required to undertake self-monitoring and report the results to Barwon Water in order to facilitate the practicable sampling of their trade waste. Some examples where self-monitoring may be required include where there are site access limitations or where further information may be required to understand the customers trade waste.

This self-monitoring will be outlined in the Trade Waste Agreement or through a request from a Trade Waste Officer and will detail the monitoring program including:

- Sampling point
- Frequency of sampling
- Analyses required

8 Trade Waste Customer Roles and Responsibilities

If consent is granted to discharge Trade Waste, a Trade Waste Permit or Trade Waste Agreement will be issued to the applicant who is responsible for the following compliance obligations:

- The Occupier may discharge authorised Trade Waste from the Premises into the Discharge Point for the period of and strictly in accordance with the terms of the Trade Waste Permit or Trade Waste Agreement.
- The Occupier must always maintain any treatment equipment in proper working condition to the satisfaction of Barwon Water.
- The Occupier must always allow an Officer access to the Premises for the purpose of monitoring the quality of waste discharged to Sewer.
- The Occupier must pay all rates, fees and charges as stated in the Trade Waste Permit or Trade Waste Agreement.
- The Occupier must, if required, cease to discharge in accordance with the requirements as outlined in Barwon Water's notice.

8.1 Trade Waste Permit Responsibilities

A Trade Waste generator producing Trade Waste assessed as suitable for discharge to Sewer and classified as a Category 1 will be issued with written approval in the form of a Trade Waste Permit.

The Trade Waste Permit is issued to the Occupier of the Premises and is non-transferable. It is the Occupier's responsibility to notify Barwon Water of a change of Occupier or any change to the Trade Waste generating process. A new Occupier would need to apply for a new Trade Waste Permit.

8.1.1 Pre-treatment devices

To discharge Trade Waste to Sewer, customers may need to install appropriate pretreatment devices with the design and specifications of Barwon Water. If this is required, our Trade Waste Officers will discuss this with you.

Pre-treatment devices must be located to enable safe and easy access to allow for sampling, inspection, and servicing.

8.1.2 Food preparation

All non-residential Premises engaged in the cooking and preparation of foodstuffs shall be required to install and maintain an adequately sized pre-treatment facility to prevent the discharge of oil, grease, fat, and food particulates into Barwon Water's sewerage system.

Oily waste is a concern to Barwon Water as it has the potential to cause substantial problems within the sewerage infrastructure, water reclamation plants and upon discharge to the environment.

Grease and oil can form deposits which restrict flow within the Sewer pipes. Substantial blockages may cause the Sewer to overflow and pollute the environment.

Oil, grease, and fat are extremely difficult to treat at the water reclamation plant. This type of pollutant increases the load on the plant and increases the treatment costs.

8.1.3 Types of pre-treatments

For all food preparation Premises, grease interceptor sizing is to be evaluated on an individual basis in accordance with Barwon Water's interceptor sizing chart.

A grease trap of a minimum size of 600 litres is required by Barwon Water and a minimum one (1) hour retention time at maximum flow, or as directed by Barwon Water. A grease trap smaller than 600 litres can only be installed after consultation with a Trade Waste Officer.

Any Premises that has the potential to discharge oily waste will need to have the appropriate pre-treatment to remove the oil.

The separation of oil from water is based on the principle of gravity (i.e., oil is lighter than water and will float on the top. Pre-treatment is usually designed around this principle.

8.1.4 Grease trap maintenance

The interceptor will work efficiently provided that the accumulated grease is removed on a regular basis. The pre-treatment facilities become progressively less efficient as grease, oil and sludge from food waste accumulates.

A grease trap represents a significant investment in waste pre-treatment by its owner and the waste it retains is the mass of pollutants prevented from entering the sewerage system over the time span between each complete clean out. The frequency of cleaning will depend upon the nature of your Trade Waste and the volume of the waste that is generated but must be timed to ensure that the grease build up does not exceed 75mm.

Failure to service it correctly at the required frequency or disposal of the waste incorrectly is a waste of resources and effort as well as a direct contribution to environmental degradation.

Grease trap effluent and residues are Environment Protection Authority prescribed waste under the Environment Protection Authority's *Environment Protection (Prescribed Waste) Regulations 2021*. Any contractor engaged to dispose of grease trap waste is required to be licensed by the Environment Protection Authority.

Customers are responsible for both ensuring any grease traps on their premises are cleaned out, serviced, and maintained in accordance with the schedule in their Trade Waste Permit; and providing Barwon Water with documentary proof of each clean out service.

8.1.5 Overdue clean outs

Any business that is overdue in cleaning out their grease trap will receive a written request from Barwon Water that the grease trap be adequately serviced.

If the business fails to meet this requirement, Barwon Water will issue a treatment violation contravention charge. Under the Act, Barwon Water may terminate the Trade Waste Permit, and/or disconnect the premises from the sewerage system.

Our Trade Waste Officers can also assess whether the grease trap is maintained often enough and adjust the cleaning frequency if necessary.

8.1.6 Reducing costs

The cleaning frequency and associated costs of maintaining the grease trap may be reduced by implementing good housekeeping methods such as:

- scraping plates clean before washing.
- dry wiping plates and utensils to remove excess grease.
- not tipping cooking oils and fats down the sink; instead collect the waste for separate disposal or recycling.
- use of minimal grease and oil for cooking; and
- use of aluminium foil to collect grease and oil spills around stoves and fryers.

8.1.7 Use of additives

The use of solvents, enzymes, mutant or natural cultures, odour control agents or pesticides in grease traps is prohibited unless specifically approved by Barwon Water.

9 Determining your risk category

9.1 Risk assessment

When an application is received for a Trade Waste Agreement, a risk assessment will be made to determine the degree of risk your Trade Waste poses to Barwon Water's sewerage facilities. The risk assessment considers matters such as:

- The Trade Waste volume.
- The goods and chemicals stored/used on site.
- The customer's compliance records.
- The effluent characteristics.
- The likelihood of an incident occurring including risk assessment of alarms, housekeeping, and management systems in place.

The risk assessment categorises the business to assist with the determination of the annual fee to cover the cost of monitoring customer compliance with the responsibilities described under section 8.

Major Trade Waste Customers are assigned a risk rating category between 2-5, Minor Trade Waste Customers are assigned to category 1 by default. Table 9-1 gives an indication of the category of waste and the associated risk rating.

Table 9-1: Waste categories and risk ratings

Category	Risk Rating
Category 5	Very High
Category 4	High
Category 3	Moderate
Category 2	Low
Category 1	Very Low

Refer to section 10.1.2 or the Fees and charges - Barwon Water page for information about the current fees and charges applicable to each category.

Customer risk assessments are generally reviewed three (3) months prior to the expiry of the customer's current Trade Waste Agreement. On request from the customer, reviews may also

be conducted at any time during the life of a Trade Waste Agreement. Barwon Water may initiate a review of a customer risk assessment at any time.

9.2 Re-assessment of risk ranking

A customer can request a review of the risk ranking to be undertaken due to changes in the process or other improvements relating to the management of Trade Waste at the Premises. Any request should be supported by details of process changes and will be verified by a Trade Waste Officer who will conduct the reassessment.

10 Fees and Charges

Barwon Water has the power to levy fees and charges for receipt and treatment of Trade Waste and other actions, such as inspections and monitoring. These fees and charges are:

- adopted under the Act; and
- regulated by the ESC, in accordance with Barwon Water's Price Determination.

Pursuant to the Act and the Price Determination, Barwon Water imposes charges for the acceptance of Trade Waste into its sewerage network.

All Trade Waste fees and charges are adjusted annually according to the Reserve Bank of Australia's consumer price index (CPI) and published on Barwon Water's website. To obtain details of charges currently applicable, refer to our fees and charges or contact us.

10.1 Types of Fees and Charges

The fees applicable to Trade Waste customer may include:

- Application / Renewal fee
- Annual fee
- Re-sampling and analysis of non-compliant waste
- Asset protection charge
- Septic waste
- Volume charges
- Trade waste quality charges
- Contravention charges

10.1.1 Application / Renewal fee

This is a once-off charge to cover the administrative cost of processing the application for a permit or agreement. This fee is non-refundable.

10.1.2 Annual fee

This annual fee (payable every year on the anniversary of the permit or agreement's approval) is required to cover the costs of Barwon Water managing, monitoring, sampling, and treating Trade Waste. The annual fee varies depending on the category of waste.

The annual Trade Waste fee is generally paid in advance and is specific to the Occupier and Premises. Should the business be sold or close, a pro-rata refund may be requested in writing.

10.1.3 Re-sampling and analysis of non-compliant waste

This fee applies if a Trade Waste discharge is required to be re-sampled because of a previous non-compliant discharge.

10.1.4 Asset protection charge

A review carried out by Barwon Water during 2001 provides Trade Waste Permit customers with the option to discharge untreated Trade Waste rather than install a pre-treatment device where it is determined that installation of a grease interceptor trap in an existing building or Premises is impractical. However, for this concession to apply, the Trade Waste Permit customers discharging untreated Trade Waste are required to pay an asset protection charge.

The asset protection charge is determined at a level that will, over time, allow Barwon Water to recover most of the additional cleaning and inspection costs for main and branch sewerage pipelines because of allowing the discharge of untreated Trade Waste.

10.1.5 Septic waste

Barwon Water also issues permit to licensed contractors for receiving, treating and disposing of septic waste at the Black Rock and Colac Receiving Stations.

10.1.6 Volume charges

10.1.6.1 Trade Waste volume

This is a charge based on the acceptance of Trade Waste volume, generally determined by the volume recorded on a Trade Waste Flow Meter or a percentage of the Water Meter.

The Trade Waste volume charge is determined by the following formula:

- Trade Waste volume charge = Volume measured/calculated (kL) × Price per kilolitre ($/kL)

10.1.6.2 Non-residential sewage volume

The sewage volume is determined as the difference between the incoming water to the property and the volume of Trade Waste. This volume is multiplied by a discharge factor to account for losses (such as evaporation). The discharge factor is based on the industry type water usage.

The sewage volume is determined using the following formula:

- Non-residential sewage volume = [Incoming water volume (kL) – Trade Waste volume (kL)] × discharge factor

The sewer volume charge is determined by the following formula:

- Non-residential sewage volume charge = Non-residential sewage volume (kL) × Price per kilolitre ($/kL)

10.1.7 Trade waste quality charges

These are charges passed on to the customer to recover costs incurred by Barwon Water for collection, transportation, and disposal of certain constituents of Trade Waste which are above the strength of typical domestic sewage.

In the instance where the discharge of Trade Waste is above domestic strength for key parameters, Trade Waste quality charges will apply. These charges are calculated based on load for each of the parameters.

Trade Waste quality charges are calculated annually using an average weighting of results from the previous 12 months of samples (or results obtained during any interim agreement). Trade Waste quality charges are subject to review and may be reset if it is determined that there is a variation in quality from the concentration as previously determined.

A customer can request a review of the concentrations used for calculating the quality charges at any time. Any request should be supported by details of process changes and a proposed audit program to demonstrate a change of quality. All associated costs with the review shall be borne by the Occupier.

It should also be noted that different quality charges apply to different locations. The differences consider the actual cost associated with the treating waste at each treatment plant.

10.1.8 Contravention charges

These charges are passed on to and payable by the Occupier to recover costs incurred by Barwon Water for investigating and monitoring contraventions of a Trade Waste Agreement or a Trade Waste Permit (as per Table 10-1: Contravention) and facilitating the customer to achieve re-compliance.

While these are the minimum charges payable to Barwon Water if a customer contravenes a Trade Waste Agreement or a Trade Waste Permit, any additional costs or damages are also recoverable by Barwon Water as per clause 11.4 below.

Table 10-1: Contravention

Category	Types of Contravention

Unpermitted discharge	▯ Breach of applicable Acceptance Criteria ▯ Discharge without a valid Trade Waste Agreement or Permit
Reporting violation	▯ Report improperly signed or certified ▯ Falsification of report ▯ Inadequate record keeping ▯ Failure to report spill or changed discharge
Monitoring violation	▯ Failure to report additional monitoring ▯ Improper sampling
Discharge violation – Type 1	▯ Waste streams are diluted in lieu of pre-treatment
Discharge violation – Type 2	▯ Failure to mitigate non-compliance
Treatment violation	▯ Failure properly operate and maintain pre-treatment equipment or facility

10.2 Exempt trade waste customers

Businesses that are exempt from the requirement of a Trade Waste Agreement or a Trade Waste Permit (refer to Table 1) are also exempt from paying any licence or permit fees for the discharge of Trade Waste while the exemption applies.

11 Enforcement and penalties

11.1 Entering your property

Barwon Water will always try to give you at least 24 hours' notice and agree on a time that suitable to attend your site if we want to carry out any inspection or works. However, in the case of a Trade Waste-related emergency, your Trade Waste Agreement or Trade Waste Permit requires you to agree that we may enter your Premises at any time without notice.

Our Trade Waste Officers and contractors need to know if there is anything on your property which could be dangerous to them. Please call our 24-hour call centre if there is any potential danger, such as a guard dog.

11.2 Enforcement regime

11.2.1 Trade Waste Permits

The Customer is responsible for both ensuring any pre-treatment device on their premises are cleaned out, serviced, and maintained in accordance with the schedule in their Trade Waste Permit; and provide Barwon Water with documentary proof of each clean out service.

Our Trade Waste Officers can also assess whether the grease trap is maintained often enough and adjust the cleaning frequency during the term of the Trade Waste Permit, if necessary.

Any business that is overdue in cleaning out their grease trap (or other pre-treatment device) will receive a written request from Barwon Water that the pre-treatment device be adequately serviced.

If the business fails to meet this requirement, Barwon Water will issue a treatment violation contravention charge. Under the Act, Barwon Water may terminate the Trade Waste Permit, and/or disconnect the premises from the sewerage system.

It is a condition of a trade waste permit that a water corporation may disconnect a trade waste connection, direct a party to that agreement to disconnect a trade waste connection or immediately require a customer under that agreement to cease or vary their discharge via a trade waste connection. Clause 32 of the *Water (General) Amendment Regulations 2025* outlines the conditions under which Barwon Water may consider a variation of discharge or disconnection.

11.2.2 Trade Waste Agreements

In the event that a shift in operations renders existing limits to be no longer representative or achievable through reasonably practicable pre-treatment, Barwon Water will consider variations to customer limits provided they will not increase risk to the Corporations operations and objectives.

If the customer commits an ongoing or significant breach, Barwon Water may give a written notice to remedy the breach and provide a timeframe to respond. The customer's response should include –

- an explanation for why the breach has occurred, and;
- advise of steps that will be taken to prevent re-occurrence, or;
- request an amendment to the conditions of the Trade Waste Agreement (such as the Acceptance Criteria) with reasoning supporting the request

Our Trade Waste Officers will review the response and confirm that the breach has been resolved or request further action to be taken.

If the customer fails to remedy the breach within the timeframe specified, Barwon Water may terminate the Agreement with immediate effect. Failure to work cooperatively with Barwon Water on compliance issues may result in Contravention Charges being applied.

If any trade waste discharge causes or is likely to cause danger or increase hazard to Persons or property, the Trade Waste Officer may direct the customer to cease or vary the discharge immediately. If the customer fails to immediately cease or vary the discharge, Barwon Water may take the necessary action to cease or vary the discharge.

It is a condition of a trade waste agreement that a water corporation may disconnect a trade waste connection, direct a party to that agreement to disconnect a trade waste connection or immediately require a customer under that agreement to cease or vary their discharge via a trade waste connection. Clause 32 of the *Water (General) Amendment Regulations 2025* outlines the conditions under which Barwon Water may consider a variation of discharge or disconnection.

Non-compliance procedures may be adopted or varied at the discretion of Barwon Water.

11.3 Prosecutions

A Person who fails to comply with or do anything required to be done under the Act, or a Trade Waste Agreement or Trade Waste Permit is guilty of an offence and risks prosecution by Barwon Water. Maximum penalties may vary for particular offences but may be up to 200 Penalty Units with additional penalties for continuing offences.

11.4 Costs incurred by Barwon Water

A Person who commits any breach relating to the discharge of Trade Waste is liable to pay Barwon Water's costs of and incidental to the enforcement of the Act and the Agreement or Permit per clause 10.1.8 above (Contravention charges). Additionally, that Person is also liable to pay compensation for the cost of protecting or cleaning up Barwon Water's assets or works and any other property affected by the illegal discharge.

11.5 Dispute resolution

Dispute resolution processes and policies are described in the customers Trade Waste Agreement and Barwon Water's Customer Charter.

12 References

12.1 Related Policies and documents:

Document Hierarchy Tier	Description
1	Strategy 2030 - Barwon Water
2	Trade Waste Policy
3	Customer Charter
4	Fees and Charges

12.2 Resources

Title
Water Act 1989 (Vic)
Water Industry Act 1994
Water (General) Amendment Regulations 2025
Environment Protection Act 2017
ESC's Water Industry Standard – Trade Waste Customer Service 2022

13 Review

In accordance with the Barwon Water document hierarchy, this Policy will be reviewed 3 years from the date of issue. However, any document may be reviewed at any time if required, including due to a change in legislation or as business operations change.