

CWMS Annual Business Plan 2025-2026 Submission

Submissions Summary Report
July 2025

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Introduction

A supplementary consultation to the Annual Business Plan 2025-26 was run on the effect of CWMS Full Cost Attribution from 30 May 2025 to 23 June 2025.

To conduct this consultation contact was made with the relevant Associations and for those residents without an Association, individual emails or letters were sent. Brenda Park and Scott's Creek Associations requested that residents in those areas be contacted individually (which was done via either email or letter).

The following questions were asked with an area for feedback also included.

1. Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?
2. Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Thirty submissions were received at the close of the engagement period and one late submission was received.

Council has prepared a Submissions Summary Report, which lists the main points made by each submitter, and what outcome they seek from Council's decisions. All non-confidential submissions are available in **Appendix 1**.

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.

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 Submission Summary and Response

Sean Edwards, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
1.1	NA	An unexplained increase of 63% in annual cost is breathtaking and lacks transparency, accountability and fairness. Justification should be detailed and reasoned or it simply portrays as a rate rise by another name. Competent fiscal management of assets is a core tenement of government with cost control at the centre. Balancing budgets by simply taxing is lazy, smug and unsustainable. Shame.	Disagrees with intent of charge. Properly explain your reasons or be damned. Poor communication is poor government.	Rationale for the proposed changes included in summary provided to all impacted users (Appendix 1). Previously Council has set the annual service fee based on the balance of accumulated funds (surplus/deficit) of each scheme along with the previous five (5) year's operating costs to project the future year's annual service fee. This fee setting did not include the recovery of internal indirect/overhead costs or the funds necessary to cover all of the future renewal of the system's infrastructure costs, being the annual depreciation expense. As a result of not including indirect/overhead costs in past fee setting, general ratepayers (including those who do not receive the CWMS	As a result of the feedback received through the consultation, following the Elected Member Briefing held on 1 July 2025, the proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27 onwards, being based on the future capital renewal requirements of each individual scheme. Further consultation will be undertaken as part of this process. To ensure compliance with Section 11(3) of the Local Government (Financial Management) Regulations, and as per the recommendations of

				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.	Council's external auditors, Full Cost Attribution is still proposed to be phased in across the next four years. It is estimated that this cost will be approximately \$39 per connection in 2025/26.
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Duncan Cochrane, Scott's Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
2.1	NA	As shack owners we already pay about 39% of the councils income in rates and cannot even get a recycling bin, let alone an appropriate green waste bin, or road maintenance. So who is actually subsidising who in the total council rate payers? Given the collective value of shacks and their rates and levy's it would be an interesting debate. Those in Morgan - and various other townships get recycling bins and more , and the shack owners are effectively paying for local roads infrastructure and facilities that they collectively	Disagrees with intent of charge.	General rates raised constitute a system of taxation for local government purposes that is based on the value of land and is not a direct fee for service. All ratepayers receive benefits from paying rates, but those benefits are consumed in different quantities and types over the lives of the ratepayer. Properties that receive a recycling bin are charged \$97 annually (the difference between a 1 bin to a 2 bin service, the second being recyclable collection).	Tabled in Council Report

		rarely use. How about council starts acknowledging our contribution to the collective income and give us at least equality in recycling and green waste, instead of just taxing the cash cow!		Council is investigating rural recycling and green waste outside of townships, however waste collection, as with CWMS, is a user pay function so any costs associated with this would be borne by those receiving the service.	
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Tom Zorich, Brenda Park

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
3.1	NA	Council rates should cover waste management services Manage the budget to include CWMS Council to focus on Roads Rubbish and public spaces	Disagrees with intent of charge.	A separate service charge applies for waste management to those properties that are provided the service, as it does for CWMS. charge occurs for waste services.	Tabled in Council Report.
3.2	NA	Second Submission CWMS is a separate charge targeting certain rate payers this operation needs to be incorporated as an general expense within the revenue collected from rate payers if you wish to make separate charges on usage then use the same principal for other services should apply	Disagrees with intent of charge.	This is the case. To ensure that all ratepayers aren't offsetting a service specific to certain users, a service charge is applied for those properties that are using the service. This is the case for waste management, Bowhill Multi Access Television Transmission Service and	Tabled in Council Report.

		don't target vulnerable ratepayers that have little or no voice around the chamber		Bowhill Reticulated Water Supply System as well.	
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Ashley Sewell, Cowirra

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
4.1	NA	Agrees with intent of change.	Agrees with intent of charge.	Noted	Nil.

Aimie Johnson, Murbko

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
5.1	NA		Disagrees with intent of charge.	As above	As above.

Naomi Belgrade, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
6.1	NA		Disagrees with intent of charge.	As above	As above.

Albert Roeslma, Brenda Park

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
7.1	NA	I do not agree to increase the expense	Disagrees with intent of charge.	As above	As above.

Lay Fox, Truro

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
8.1	NA	We wish to add a CWMS connection at our property in Truro.	Agrees with intent of charge.	Additional connections to the existing property will be dependent on allotment frontage to CWMS main line.	Enquiry redirected to the Environmental Health Officer.

Cheryl Humphris, Cowirra

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
9.1	NA	I feel now that we were misled by council about the expected ongoing cost of connection to the system. The lack of transparency regarding the outrageous cost is of major concern. Not only did council decreased the value of my property by locating facilities right outside my home with out consultation but now	Disagrees with intent of charge.	Elected Member Briefing held on 1 July 2025, proposed that instead of the depreciation component being charged for Cowirra and Truro, Council will consider instead the implementation of a Capital Renewal Annuity cost component from 2026/27 onwards, being	Modeling to be performed and further consultation will be undertaken as part of this process

		have raised again by an exorbitant amount the cost of the maintenance of the system.		based on the future capital renewal requirements of each individual scheme. This change will most likely result favorably in future CWMS Annual Service fee for these two schemes.	
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Shaun Irvine, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
10.1	NA	My costs thus far to connect to the waste management system that council forced on us has been substantial, considering I had a perfectly good working and proven septic system. And now council wants me to pay \$ 481.00 annually a 65% increase on the system that they introduced because it may need some extra maintenance due to its age. council has stated in this document that to fully replace the CWMS at Pelican Point would be \$ 1,187,723.00, i cannot see a reason why at any time other than a natural catastrophic disaster happening. that the whole	Disagrees with intent of charge.	Rationale for the proposed changes included in summary provided to all impacted users (Appendix 1). Previously Council has set the annual service fee based on the balance of accumulated funds (surplus/deficit) of each scheme along with the previous five (5) year's operating costs to project the future year's annual service fee. This fee setting did not include the recovery of internal indirect/overhead costs or the funds necessary to cover all of the future renewal of the system's infrastructure costs, being	As a result of the feedback received through the consultation, following the Elected Member Briefing held on 1 July 2025, the proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27 onwards, being based on the future capital renewal requirements of each individual scheme. Further consultation will be undertaken as part of this

		system would have to be replaced, our system was under water for 4 months and survived. Other than a predicted budget on what ifs! i would want a more substantial explanation for a 65% increase on my CWMS charge.		the annual depreciation expense. As a result of not including indirect/overhead costs in past fee setting, 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.	process. To ensure compliance with Section 11(3) of the Local Government (Financial Management) Regulations, and as per the recommendations of Council's external auditors, Full Cost Attribution is still proposed to be phased in across the next four years. It is estimated that this cost will be approximately \$39 per connection in 2025/26
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John Barry, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
11.1	NA	This is a crazy increase in price when the cost of living is out of control anyway. This should have been a small increase annually so it's not as noticeable. If we were living on the property full time I could understand the cost but when it's only used occasionally it is ridiculous.	Disagrees with intent of charge.	Rationale for the proposed changes included in summary provided to all impacted users. Previously the fee setting did not include the recovery of internal indirect/overhead costs or the funds necessary to cover all of the future renewal of the system's infrastructure costs, being	As a result of the feedback received through the consultation, following the Elected Member Briefing held on 1 July 2025, the proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a

				the annual depreciation expense.	Capital Renewal Annuity cost component from 2026/27 onwards, being based on the future capital renewal requirements of each individual scheme. Further consultation will be undertaken as part of this process.
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Brenton Allen, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
12.1	NA	What is required for an administration charge other than the annual charge to the resident.	Disagrees with intent of charge.	Rationale for the proposed changes included in summary provided to all impacted users. Previously the fee setting did not include the recovery of internal indirect/overhead costs.	Tabled in Council Report.

Steve McCarthur, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
13.1	NA	This is robbery! We as shack owners pay more than four times the rates as do private owners next door! Take the increase from the rates! We get nothing for	Disagrees with intent of charge.	2024/25 rates were higher than adjoining neighbors due property valuation being higher. Comparison is being made between your annual rates and your	Comparison advice to be provided.

		them, not even rubbish removal!	
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neighbors quarterly installment amounts.	
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Robyn Allen, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought
14.1	Clause 1.1	A price increase of almost double is excessive and ridiculous, as is question 2 where you ask are aware that we hadn't been charged adequately previously.	Disagrees with intent of charge.

Response	Action
Rationale for the proposed changes included in summary provided to all impacted users.	The proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27 onwards, being based on the future capital renewal requirements of each individual scheme. Further consultation will be undertaken as part of this process.

Stephen Coles, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought
15.1	NA	Where are our council rates going for Pelican Point besides for our bin collection?	Disagrees with intent of charge.

Response	Action
Council provides an Annual Business Plan (ABP) Summary with the initial rate notice that	Tabled in Council Report.

				summarises the expenditure by major activity. Further detail can be obtained by viewing the ABP on the Council's website.	
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Rebecca Coles, Pelican Point

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
16.1	NA	Pelican Point is in surplus, we pay the same rates as everybody else and the council only provide to us this as well as the bin service	Disagrees with intent of charge.	CWMS Pelican Point Scheme Surplus Balances: 30/06/2022 \$57,141 30/06/2023 \$27,232 30/06/2024 \$18,519 Surplus balance of schemes will be taken into account in the 2026/27 setting of fees. Modelling to be performed and further consultation will be undertaken as part of this process	Modeling to be performed and further consultation will be undertaken as part of this process

Ben Guidotto, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
17.1	NA	I believe that the increase is too high for the return work that is supplied for our area,	Disagrees with intent of charge.	General rates raised constitute a system of taxation for local	Tabled in Council Report.

		we have no Recycle bins provided and the main road leading into our house road is starting to break away.		government purposes that is based on the value of land and is not a direct fee for service.	
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Jenni Hosking, Scotts Creek

Submission#/ Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
18.1	NA	I wish to express my total opposition to the proposed increase in the CWMS annual service fee for leaseholders. The proposed fee hike is excessive and an unfair financial burden on leaseholders. The proposed 47% increase for Scotts Creek is substantial that will disproportionately impact leaseholders. Many residents will struggle to accommodate such a huge increase, on top of the excessive council rates we already pay, making it unreasonable to implement this change. Leaseholders should not be unfairly expected to cover costs that were previously funded from broader Council revenue.	Disagrees with intent of charge.	Rationale for the proposed changes included in summary provided to all impacted users (Appendix 1). Previously the fee setting did not include the recovery of internal indirect/overhead costs or the funds necessary to cover all of the future renewal of the system's infrastructure costs, being the annual depreciation expense.	As a result of the feedback received through the consultation, following the Elected Member Briefing held on 1 July 2025, the proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27 onwards, being based on the future capital renewal requirements of each individual scheme. Further consultation will be undertaken as part of this process.

William Lees, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
19.1	NA	Why does this not allow me to paste my response. This is an inadequate attempt at consultation. Before the flood I was denied access to the STED by Council as I hadn't built upon the block though I had to pay for the instalment and ongoing costs. After the flood I am not using the block and have no STED infrastructure installed on my block and hence am not connected. Without building at enormous cost I will not be able to use the STED . Why should I be expected to be increasingly be funding something I cannot have access to or use ? I want it noted I wish to have pasted the Scott's Creek submission which your website has not allowed!	Disagrees with intent of charge.	Submissions greater than 300 words not accepted via website, however large submissions can be sent to postbox@mid-murray.sa.gov.au or mailed in. Usage of the CWMS is conditional on the compliance of the appropriate planning and building regulations.	Public Consultation web pages now advised of the restriction of the maximum number of words that can be entered.

Russell Waller, Kendal Waller & Daniel Cox, Amy Cox, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
20.1	NA	Financial Burden on Leaseholders The proposed 47% increase in CWMS fees for Scotts Creek is a substantial and sudden adjustment that will disproportionately impact leaseholders.	Many residents may struggle to accommodate such a dramatic rise, making it unreasonable to implement this change without a more gradual transition.	Lease holders are not treated any different than owners of freehold land.	As a result of the feedback received through the consultation, following the Elected Member Briefing held on 1 July 2025, the proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27 onwards, being based on the future capital renewal requirements of each individual scheme. Further consultation will be undertaken as part of this process.
20.2	NA	Cross-Subsidisation Is Not Permitted for Ratepayers—So Why Leaseholders?	This inconsistency raises serious fairness concerns—why is cross-subsidisation prohibited in one case but imposed in another? Leaseholders should not be unfairly expected to cover costs that were previously	Leaseholders and freehold owners are not treated any differently, there is no inconsistency. Cross-subsidisation is not permitted under legislation, which requires that only those who benefit	As above.

			funded from broader Council revenue.	from the service bear its full cost.	
20.3	NA	Existing Surplus Funds Should Be Utilized First Before imposing significant fee increases.	Funds that could be used to mitigate cost pressures and prevent unnecessary hardship for leaseholders. It is unreasonable to demand additional payments while surplus funds remain under-utilised.	Surplus balance of schemes will be taken into account in the setting of fees for 2026/27.	As above.
20.4	NA	Unjustified Comparison to SA Water Costs.	The Council's CWMS schemes, with far fewer connections per system, do not benefit from the same cost efficiencies and should not be subjected to equivalent pricing structures.	Council's CWMS Schemes do not have the same cost efficiencies as SA Water due to the lower average number of connections, however the average annual service fee of Council is only 54% (\$200 less) than SA Waters. Justified as an industry benchmark comparison.	As above.
20.5	NA	Alternative Cost Recovery Measures Should Be Considered Instead of imposing drastic fee hikes.	A gradual, phased approach to fee increases would be far more reasonable than the proposed immediate adjustment.	The Council has proposed a 5 year phased in period for the additional FCA expenditure.	As above.

Jan Badcock, Blanchetown

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
21.1	NA	My understanding was that we paid a large sum in advance at the time of joining the scheme that would cover large fee in the event that the system needed to be upgraded. I believe there is still a large amount of these funds held \$175,000 for this purpose. I am assuming this is being accounted for as looking at the other CWMS that did not pay an advance sum for future renewals have higher annual service charges to compensate. Happy that users will be contributing to the future renewal of the schemes assets progressively rather than be hit with a big bill further up the track.	Supports the intent of charge.	The additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27 for each individual scheme. Council acknowledges that some schemes have a surplus balance and this will be taken into account in the 2026/27 setting of fees.	As above.

Gerry Howley, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
22.1	NA	Unreasonable Financial Burden A 47% increase in one year places undue pressure on leaseholders, many of whom are retirees or on fixed incomes.	Disagrees with intent of charge.	Rationale for the proposed changes included in summary provided to all impacted users. Previously the fee setting did not include the recovery of internal indirect/overhead costs or the funds necessary to cover all of the future renewal of the system's infrastructure costs, being the annual depreciation expense. The Council has proposed a 5 year phased in period for the additional FCA expenditure.	As a result of the feedback received through the consultation, following the Elected Member Briefing held on 1 July 2025, the proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27 onwards, being based on the future capital renewal requirements of each individual scheme. Further consultation will be undertaken as part of this process.
22.2	NA	Inconsistency in Cross-Subsidisation Policy Council has previously stated that cross-subsidisation of CWMS services by general ratepayers is impermissible. Yet this proposed fee hike suggests indirect and administrative costs are now		As a result of not including indirect/overhead costs in past fee setting, general ratepayers (including those who do not receive the CWMS service) have been subsidising the true cost of providing the service and this cross-	As above

		being shifted to leaseholders—raising questions about whether principles of financial policy are being applied consistently.		subsidisation is not permitted under legislation, which requires that only those who benefit from the service bear its full cost.	
22.3	NA	Use of Existing Surplus Funds Scotts Creek reportedly holds a surplus in its CWMS account. It is difficult to justify increased charges when available funds remain unused.	These funds should be applied to alleviate immediate cost pressures and ease the transition to full cost recovery. Also, is there a reason there is no transparency around the amount of surplus funds?	Surplus balance of schemes will be taken into account in the setting of fees for 2026/27.	As above
22.4	NA	Inappropriate Benchmarking to SA Water Charges SA Water's sewerage network benefits from significant economies of scale that Mid Murray CWMS schemes cannot replicate.	Benchmarking fee structures against SA Water does not reflect the localised, small-scale realities of Council-run schemes and sets a misleading standard.	Council's CWMS Schemes do not have the same cost efficiencies as SA Water due to the lower average number of connections, yet the average annual service fee of Council is only 54% (\$200 less) than SA Waters. Justified as an industry benchmark comparison.	Tabled in Council Report.
22.5	NA	Inadequate Consultation Period A consultation period of less than 25 days is insufficient for meaningful community input on a policy shift of this magnitude.		Standard consultation period is 21 days. Consultation for ABP started on May 21 (this was included in that) and additional CWMS Consultation was undertaken from 31 May	Refer 22.1.

				to 30 June (extended from 23 June).	
22.6	NA	Declining Services Despite Fee Increases Leaseholders at Scotts Creek continue to see reduced services—including limited waste transfer access, no kerbside recycling, and declining road maintenance—		These services are separate from the CWMS services and are not included in the costings for CWMS.	Tabled in Council Report.
22.7	NA	Lack of Recycling Services Despite Environmental and Financial Benefits Scotts Creek leaseholders do not receive kerbside recycling or green waste collection, unlike other areas of the Council.		These services are separate from the CWMS services and are not included in the costings for CWMS. Free Green Waste disposal is available to all rate payers (see website for dates for this). All ratepayers can apply for 2 x hard waste disposal vouchers per year.	Tabled in Council Report.
22.8	NA	Concerns About Transparency and Consultation on Policy Shift The introduction of full cost attribution, depreciation recovery, and indirect cost allocation represents a major change in Council's budgeting policy. Yet this shift has not been adequately explained to leaseholders, nor has there been prior consultation specific to the	Council to engage more openly on structural financial changes affecting communities.	Refer to 22.1.	Refer to 22.1.

		financial model now being implemented.			
22.9	NA	Leaseholders' Limited Connection to Indirect Costs The inclusion of overheads such as internal payroll, records management, or general corporate services may reflect broader operational costs—but many of these services have little direct relevance or benefit to part-time shack leaseholders.	We request that Council consider proportionality and material relevance when allocating these costs.	Council is now seeking to recover the appropriate proportion of internal indirect/overhead costs (that were previously not recovered). Appropriate cost drivers have been selected for each individual indirect/overhead cost eg. HR & Payroll costs are attributed on No. Employees.	Tabled in Council Report.
22.10	NA	Need for Equitable Service-Linked Cost Recovery If Council aims to recover the full cost of services, it must also ensure that all communities receive service levels commensurate with the fees they are paying.	A shift to full cost recovery must be accompanied by a service audit to ensure value is being delivered across all CWMS areas.	Council is in the second year of sustainability reviews to cover efficiencies and savings (once off and reoccurring).	As above.
22.11	NA	Impact on Tourism and the Local Economy Scotts Creek and other shack settlements play a vital role in supporting the Mid Murray region's tourism economy.	Council should consider the economic contribution of shack leaseholders not only as ratepayers, but as enablers of tourism and seasonal growth.	Noted.	As above.
22.12	NA		Request for Council Action In light of the above concerns, I respectfully urge Council to: Reject the proposed 47% increase and	The proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will	Tabled in Council Report.

			instead adopt a gradual, phased adjustment model. • Utilise available surplus funds to offset cost increases at Scotts Creek. • Apply cross-subsidisation principles consistently and fairly across all service users. • Reassess the allocation of indirect costs and their applicability to leaseholders. • Extend the community consultation period and improve stakeholder communication. • Conduct a review of service equity across shack communities, particularly regarding waste and recycling infrastructure.	consider the implementation of a Capital Renewal Annuity cost component from 2026/27. The recognition of fund balances will be recognised in the fee setting for the 2026/27 fees. The introduction of Full Cost Attribution is to ensure that that only those who benefit from the CWMS service bear its full cost. Allocation of indirect costs are based on the resources utilised not the type of ownership (leaseholders/Freehold). With the Capital Renewal Annuity cost component from 2026/2, further consultation will be undertaken as part of this process. Noted, but not within the scope of the CWMS Consultation.	
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Steve Murphy, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
23.1	NA	As recent retirees who call Scotts Creek home, the proposed 47% increase is not something our forward financial plans can absorb after significant investment in uninsured building repairs and equipment and goods replacement after the 2022 flood. Some of this expense could have been avoided if access roads were not closed at such an early stage. The system must remain financially viable but a staged increase cost program must be utilised.	Disagrees with intent of charge.	The proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27. Council supports the principles of phasing in additional costs, however this must be balanced not to allow scheme fund to run into deficits.	As per response.

Adam Madrussami, Brenda Park

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
24.1	NA	1.Perhaps council can confirm who owns the CMWS system ? I look forward to your reply	Disagrees with intent of charge.	Council owns the CWMS systems. The proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the	As per ESCOSA pricing principles, Council is to ensure that capital expenditure forecasts are included in the future service fees (this is also applicable all previously gifted assets).

				implementation of a Capital Renewal Annuity cost component from 2026/27.	
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Jim Johnstone, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
25.1	NA	I don't think Shack Owners should have to pay for internal indirect overheads. For the exorbitant amount of rates everyone pay's, surely these charges should come from the rate revenue we pay, after all, we only get one bin collection weekly for the exorbitant amount we pay. The amount of rates I pay, are equal to 2 multi million dollar homes in Burnside!!! It's about time the rates paid by Shack Owners in the North Ward get spent in the North Ward, it's painfully obvious that hasn't happened for years!!!	Disagrees with intent of charge.	The introduction of Full Cost Attribution (indirect/overheads) is to ensure that that only those who benefit from the CWMS service bear its full cost. General rates raised constitute a system of taxation for local government purposes that is based on the value of land (by legislation) and is not a direct fee for service. All ratepayers receive benefits from paying rates, but those benefits are consumed in different quantities and types over the lives of the ratepayer	Tabled in Council Report.

Paul Bennett, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
26.1	NA	Unreasonable Financial Burden A 47% increase in one year places undue pressure on leaseholders, many of whom are retirees or on fixed incomes.	Disagrees with intent of charge.	The proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27.	Tabled in Council Report.
26.2	NA	Inconsistency in Cross-Subsidisation Policy Council has previously stated that cross-subsidisation of CWMS services by general ratepayers is impermissible. Yet this proposed fee hike suggests indirect and administrative costs are now being shifted to leaseholders—raising questions about whether principles of financial policy are being applied consistently.		As a result of not including indirect/overhead costs in past fee setting, general ratepayers (including those who do not receive the CWMS service) have been subsidising the true cost of providing the service and this cross-subsidisation is not permitted under legislation, which requires that only those who benefit from the service bear its full cost.	As above.
26.3	NA	Use of Existing Surplus Funds Scotts Creek reportedly holds a surplus in its CWMS account. It is difficult to justify increased	These funds should be applied to alleviate immediate cost pressures and ease the transition to full cost recovery. Also, is	Surplus balance of schemes will be taken into account in the setting of fees for 2026/27.	As above.

		charges when available funds remain unused.	there a reason there is no transparency around the amount of surplus funds?		
26.4	NA	Inappropriate Benchmarking to SA Water Charges SA Water's sewerage network benefits from significant economies of scale that Mid Murray CWMS schemes cannot replicate.	Benchmarking fee structures against SA Water does not reflect the localised, small-scale realities of Council-run schemes and sets a misleading standard.	Average annual service fee of Council is only 54% (\$200 less) than SA Waters. Justified as an industry benchmark comparison.	As above.
26.5	NA	Alternative Cost Recovery Measures Should Be Considered Instead of imposing drastic fee hikes, the Council should explore alternative funding solutions—including external grants and revised financial management strategies—that do not unfairly target ratepayers.	A gradual, phased approach to fee increases would be far more reasonable than the proposed immediate adjustment.	Council will be phasing in the FCA over 5 years and instead of recovering depreciation, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27.	
26.6	NA	The CWMS system must remain financially sustainable without creating unnecessary hardship for ratepayers. We appreciate your time in reviewing this submission and hope the Council will reconsider the scale and structure of the proposed increase.	Given these concerns, we respectfully urge the Council to: • Ensure consistency in financial policy by rejecting cross-subsidisation for leaseholders/ratepayers just as it is prohibited for ratepayers. • Utilize existing surplus funds (such as Scott's Creek's CWMS account) to offset costs	Refer to 26.2 implementation of a Capital Renewal Annuity cost component from 2026/27. Fund balances will be recognized in the fee setting of the 2026/27 fees	As above.

			before considering fee increases. • Implement a gradual fee increase rather than an immediate 47% rise. • Reevaluate the allocation of indirect overhead costs to ensure fairness. • - Explore alternative funding mechanisms that reduce financial strain on leaseholders.	The introduction of Full Cost Attribution will be phased in over 5 years. Appropriate drivers have been selected for each indirect overhead cost eg. HR & Payroll based on No. Employees. No grants are available for the renewal of CWMS only for the establishment of new CWMS Schemes.	
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Kym McLean, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
27.1	NA	We pay the most rates n should not have to pay more. I hope the damage from floods were not in the 5 year average.	Disagrees with intent of charge.	The previous calculation of the annual CWMS Service fee was suspended 2 years ago due to the flood, instead all schemes received CPI increases.	Tabled in Council Report.
27.2	NA	Why doesn't Council put out a feedback survey to Rate payers on 'Cost Saving' ideas. Light bulb  ideas, 'Think Tank' etc I certainly would be interested.		Noted for Council's consideration.	As above.

Michael Schefe, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
28.1	NA	Our council rates are already a ridiculous amount! We get nothing back for that money. How about putting some of the shack owners council rates back into the shack areas. That might help for next time you ask the shack owners for more money.	Disagrees with intent of charge.	Noted. Council is unable to invest on private property.	Tabled in Council Report.

Brad Mucklow, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
29.1	NA	A proposed increase of 47% over consultation of less than 25 days is disappointing.	Disagrees with intent of charge.	Standard consultation period is 21 days. Consultation for ABP started on May 21 (this was included in that) and additional CWMS Consultation was undertaken from 31 May to 30 June (extended from 23 June).	Tabled in Council Report.
29.2	NA	Significant revenue is collected by the MMC however there have been a reduction in the services provided. No recycling bins, potential increase in waste management charges,		These services are separate from the CWMS services and are not included in the costings for CWMS. Free Green Waste disposal is available to all	As above.

		reduced maintenance of Shack road.		rate payers (see website for dates for this). All ratepayers can apply for 2 x hard waste disposal vouchers per year.	
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Stephen Nicholson, Scotts Creek

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
30.1	NA	In the past all costs associated with particular schemes have been partially attributed to each scheme. Scott's Creek scheme has paid all of their portion and are running with a positive balance, so why the need to change? Normal rates etc would have an "internal indirect/overhead cost" not accounted for - this is the part of the overall cost of running any business which is set in the rating costs. Each area of council, wages, procurement would have associated costs which come out of the "running" purse, as would the admin costs for running any scheme. All expenses for maintenance and pumps have been deducted from the scheme,	Disagrees with intent of charge.	Rationale for the proposed changes included in summary provided to all impacted users. Previously Council has set the annual service fee based on the balance of accumulated funds (surplus/deficit) of each scheme along with the previous five (5) year's operating costs to project the future year's annual service fee. This fee setting did not include the recovery of internal indirect/overhead costs or the funds necessary to cover all of the future renewal of the system's infrastructure costs, being the annual depreciation expense. As a result of not including indirect/overhead	Tabled in Council Report.

		right down to the cost of a washer, and where it was purchased.		costs in past fee setting, 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.	
30.2	NA	In the initial set up of the scheme, a State Government Grant/Loan was obtained and the choice to pay up front in full or over 10 years, with appropriate interest added, was offered.	Why would this not be the case in the need for replacement of the system?	As per ESCOSA pricing principles (that Council is now required to report annually on compliancy), Council's Asset Management Plan specifies the prudent and efficient capital expenditure for renewing, upgrading or extending assets over a medium to long-term time period, and are to convert the capital expenditure forecasts to a future annualised charge. This also applicable all previously gifted assets.	Tabled in Council Report.
30.3	NA		Who receives the depreciation on the asset? Probably council- even though the scheme is wholly funded by Scotts	All Annual CWMS Service fees raised are credited to each individual CWMS Scheme Fund.	Tabled in Council Report.

			Creek and only managed by council with no choice on our behalf.		
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Late submission, Presidents - Scotts Creek, Brenda Park & Pelican Point Associations

Submission#/Point #	Provision	Submission Point Summary	Decision Sought	Response	Action
31.1	NA	The proposed 37- 47% increase in CWMS fees for Brenda Park, Scotts Creek and Pelican Point is a substantial and sudden adjustment that will disproportionately impact ratepayers.	It unreasonable to implement this change without a more gradual transition. Instead of imposing drastic fee hikes, the Council should explore alternative funding solutions—including external grants and revised financial management strategies—that do not unfairly target ratepayers. A gradual, phased approach to fee increases would be far more reasonable than the proposed immediate adjustment.	The proposed additional depreciation component has been removed from the 2025/26 CWMS Annual Service fee. Instead, Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27. No grants are available for the renewal of CWMS only for the establishment of new CWMS Schemes. Council will phase in the introduction of Full Cost Attribution (indirect/Overhead costs) over 5 years.	Tabled in Council Report.
31.2	NA	CWMS Ratepayers should not be unfairly expected to cover costs that were previously funded from broader Council revenue raised from CWMS		As a result of not including indirect/overhead costs in past fee setting, general ratepayers (including those who do not receive the CWMS service) have	Tabled in Council Report.

		ratepayers who are paying more than their fair share of rates given the lack of services received for those rates.		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	
31.3	NA	Before imposing significant fee increases, the Council must explore existing financial resources.	Scott's Creek currently has a surplus in its CWMS account —funds that could be used to mitigate cost pressures and prevent unnecessary hardship for leaseholders. It is unreasonable to demand additional payments while surplus funds remain under-utilised.	Refer to 30.1 Fund balances will be recognized in the fee setting of the 2026/27 fees	Tabled in Council Report.
31.4	NA	The Council's benchmarking of CWMS fees against SA Water charges fails to consider key factors such as economies of scale. SA Water serves a significantly larger customer base, allowing for more efficient cost distribution.	The Council's CWMS schemes, with far fewer connections per system, do not benefit from the same cost efficiencies and should not be subjected to equivalent pricing structures.	Council's CWMS Schemes do not have the same cost efficiencies as SA Water due to the lower average number of connections, yet the average annual service fee for Council is only 54% (\$200 less) than SA Waters. Justified as an industry benchmark comparison	Tabled in Council Report.
31.5	NA		Request for Council Action In light of the above	Refer to Council CWMS Asset Management Plan	Latest condition rating evaluation to be supplied.

			concerns, I respectfully urge Council to: • Provide a copy of deterioration reports on our three CWMS systems. • Provide copies of accounts for the last 10 years. • Guarantee surplus funds for each system remain in that system. • Utilize existing surplus funds to offset costs before considering fee increases. • Implement a gradual fee increase rather than an immediate 47% rise. • Consider a sinking fund and high interest accounts for each system. • Reevaluate the allocation of indirect overhead costs to ensure fairness. • Explore alternative funding mechanisms that reduce financial strain on ratepayers.	which is available on Council's Website that outlines the 15 forward years of the capital renewal program. Council will supply Summary Reports Current practice, and will be continues as per legislation requirements. Fund balances will be recognised in the fee setting of the 2026/27 fees Council will phase in the introduction of Full Cost Attribution (indirect/Overhead costs) over 5 years Council will consider the implementation of a Capital Renewal Annuity cost component from 2026/27. Appropriate drivers are selected for each indirect overhead cost eg. HR & Payroll based on No. Employees. No grants are available for the renewal of CWMS only for the establishment of new CWMS Schemes.	Summary Reports to be supplied. Tabled in Council Report
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Appendix 1 –Notification

Notification of the Public Consultation

The Public Consultation was targeted to those who would be directly affected by the changes.

A tile was placed on the front page of Council's website with a link to the Your Say / Engagement page.

On 30 May 2025 an email was sent to all known Shack Associations and relevant Progress Associations requesting that the consultation paper be distributed to their membership.

For those areas without a known association emails or letters were sent to individuals on 2 June 2025.

On 4 June 2025 an email request from Brenda Park and Scott's Creek Associations was received requesting that residents in those areas be contacted individually (which was done via email or letter).

Hard copies of the consultation paper were available at all Council offices for the period of Consultation.

Replies were accepted until noon on Monday 30 June 2025 (extended from the original cut off date of 5.00pm 23 June 2025)

Community Wastewater Management Systems 2025/26

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, Council has set the annual service fee based on the balance of accumulated funds (surplus/deficit) of each scheme along with the previous five (5) year's operating costs to project the future year's annual service fee. This fee setting did not include the recovery of internal indirect/overhead costs or the funds necessary to cover all of the future renewal of the system's infrastructure costs, being the annual depreciation expense.

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. This fee setting did not include the recovery of internal indirect/overhead costs.

As a result of not including indirect/overhead costs in past fee setting, 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.

In 2024/25, Council elected to only increase CWMS annual service fees by the estimated CPI, being 3.1%, due to the then on-going financial impact of the 2022/23 River Murray Flood.

Comparison to SA Water

In benchmarking the 2024/25 CWMS annual service fee to the current SA Water sewerage charge, Council is charging approximately \$201 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 would also be lower than Council's due to the economies of scale that SA Water would have by servicing a much larger number of systems. The table below provides a comparison of SA Water to Mid Murray:

	Mid Murray Council	SA Water
Number of schemes	28	42
Total connections	1,826	556,511
Average connections per scheme	65 (with 6 being the smallest connections)	13,250
Annual Service Fee 2024/25	\$367 (54% of SA Water's Fee)	\$568 (if raised by SA Water Fee Structure)

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 is now seeking to recover the appropriate proportion of the following internal indirect/overhead costs (that were previously not recovered) 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 indirect administrative costs, and to recover adequate funds for the future renewal (annual depreciation expense) of the system's infrastructure.

Moving forward

With many of Council's CWMS now entering mid-life (on average 59% 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, previously, 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 all of the future renewal of the system's infrastructure costs, being the annual depreciation expense.

The table below shows the costs that have been recovered by Council previously from the schemes, compared to the ESCOSA costing principles:

	Direct costs	Indirect costs	Depreciation expenses
ESCOSA costing principles	✓	✓	✓
Cowirra & Truro	✓	✗	✓
All other schemes	✓	✗	✗

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

	Direct costs	Indirect costs	Depreciation expenses
ESCOSA costing principles	✓	✓	✓
All other schemes*	✓	✓	✓

* Note – it is proposed that these increased costs would be phased in over five years

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, taking into account the depreciation of any assets) the services provided in its area.

2025/26 Draft Annual Business Plan & Budget

For the first time, Council's 2025-26 Budget has been prepared including 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 service charge.

As a result, from a total indirect cost amount of \$5.1million across the organisation, an amount of \$354,000 has been 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 and administrative costs;
- Taxes; and
- Provision for asset consumption (depreciation).

With many of the schemes now entering mid-life, a total amount of \$6.1million of capital renewal has been budgeted across the next 10 years, compared to the current scheme funds of \$773,000.

Across the next five years, Council will now phase in the requirements of the ESCOSA pricing principles guidance (as outlined above) to achieve full cost recovery, including current shortfalls of maintenance costs, CWMS annual depreciation (\$668,000) and full cost attribution related costs (\$355,000).

The following are the budget estimates for 2025/26:

Operational, maintenance cost	\$1,221,000
Indirect administrative costs	\$ 355,000
Future renewal of the systems infrastructure (depreciation)	\$ 668,000
Total	<u>\$2,244,000</u>

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

The financial impact of Council implementing full cost attribution and full cost recovery will be a material increase of 47% for the average CWMS annual service charge in 2025/26.

The Truro and Cowirra Schemes annual service charge have previously been based on the operating cost of the schemes (including depreciation), noting that applying annual service charge has now also increased their annual service charge.

The table below provides details of each scheme's current asset value, and the current and proposed service charge for 2025/26:

Mid Murray Council Community Wastewater Management Systems

Scheme	No. Prop Units as at 27/04/25	Scheme replacement cost (\$)	CWMS annual service charge - 2024/25 (\$)	Proposed CWMS annual service charge - 2025/26 (\$)
Big Bend	25	375,763	\$596	\$797
Blanchetown	238	2,748,859	\$265	\$412
Bolto	44	734,526	\$464	\$605
Bowhill	157	2,596,545	\$289	\$458
Brenda Park/Morphett Flat	133	1,950,021	\$362	\$496
Caloote Landing Area	43	1,183,516	\$377	\$589
Caurnamont	75	1,126,003	\$358	\$520
Five Mile/Kia Marina	13	475,141	\$1,470	\$1,570
Greenways Landing	8	227,122	\$882	\$1,280
Idyll Acres	62	1,112,096	\$483	\$757
Julanker/Younghusband	38	1,106,907	\$742	\$937
Kroehns Landing	6	214,197	\$1,203	\$1,640
Marks Landing	142	1,932,723	\$304	\$443
North West Bend/ Beaumonts	85	1,214,037	\$173	\$357
Old Teal Flat	11	368,651	\$351	\$809
Pelican Point	71	1,187,723	\$292	\$481
Pellaring Flat	24	554,621	\$465	\$708
North Punyelroo	12	89,726	\$221	\$385
Rob Loxton Road/Walker Flat	162	1,913,616	\$177	\$349
Scotts Creek	101	1,492,589	\$359	\$514
Scrubby Flat Area	10	243,621	\$478	\$717
Seven Mile	11	464,618	\$642	\$904
South Punyelroo	100	2,223,933	\$320	\$494
Swan Reach	26	450,633	\$442	\$608
Teal Flat	71	713,439	\$305	\$476
The Rocks	6	232,079	\$978	\$1,232
Truro - Normal Connection	66		\$724	\$874
Truro - Aerobic	20		\$362	\$437
Truro - Private Pumping	11		\$694	\$838
Truro	97	2,766,034		

Cowirra	55	2,641,915	\$660	\$892
TOTAL	1,826	32,340,654		

Consultation

Council is currently undertaking consultation on its [2025/26 Draft Annual Business Plan & Budget](#) and [Draft Long Term Financial Plan 2025/26 to 2034/35](#)

As part of this process, and given the proposed changes as a result of full cost attribution and full cost recovery and the associated financial impact of these changes outlined above to Council's CWMS schemes, Council is seeking specific feedback from users of Council's CWMS.

To provide feedback please complete the form available on Council's website (<https://engagement.mid-murray.sa.gov.au/>), or provide written feedback via postbox@mid-murray.sa.gov.au

Submissions in relation to the 2025/26 Community Wastewater Management Systems annual service charges are to be lodged prior to close of business Monday 23 June 2025.

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 2 - Submissions

The associations of Brenda Park, Scotts Creek and Pelican Point distributed a survey -Brenda Park/Morphett Flat CWMS Annual Business Plan 2025-2026, below are the collated responses from this.

	Question	Yes	No	Comments
1	Do you support the increase of 37% to the annual charge to ensure that your scheme has adequate funds to perform a major repair and replacement of your sewage scheme?	3	11	
2	Do you support the \$194 increase for indirect administrative costs of your CWMS system	3	11	
3	Would you want your CWMS system to have a sinking fund rather than being charged depreciation?	8	5	1 respondent had the following questions: Who determines the amount? Is the amount set annually? Can the amount be reduced if the balance gets excessive? Is the sinking fund held by Brenda Park Land Holders Inc? Who collects the money
4	Would you like to see annual accounts for your CWMS?	14		
5	Would you like these accounts to include the balance of your sinking fund?	13	1	Yes, but whose money is it?
6	Given the accumulative amount that will be held in your sinking fund would you like to see these funds invested in higher interest term deposits with interest received showing on the balance sheet?	13	1	
7	Would you like to see a copy of the deterioration report on your CWMS to understand what may need replacing and when?	14		
	General Comments:	The CWMS needs to be incorporated as an expense with General Business of Council – NOT treated as a separate rate exercise.		

Notes from the above:

15 Responses to the survey received, 1 response was not able to be opened/read.

CWMS Annual Business Plan 2025-2026 Submission

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Thursday, 5 June 2025 7:54 PM
To: Tracy Bawden
Subject: IFOR10382-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10382-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Sean

Last name

Edwards

Address

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

An unexplained increase of 63% in annual cost is breathtaking and lacks transparency, accountability and fairness. Justification should be detailed and reasoned or it simply portrays as a rate rise by another name. Competent fiscal management of assets is a core tenement of government with cost control at the centre. Balancing budgets by simply taxing is lazy, smug and unsustainable. Shame.

Properly explain your reasons or be damned. Poor communication is poor government.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Wednesday, 4 June 2025 11:17 PM
To: Tracy Bawden
Subject: IFOR10390-25 - 18/CON/SUR/1 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10390-25 - 18/CON/SUR/1

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Duncan

Last name

Cochrane

Address

Scott's Creek, Morgan

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

As shack owners we already pay about 39% of the councils income in rates and cannot even get a recycling bin, let alone an appropriate green waste bin, or road maintenance.

So who is actually subsidising who in the total council rate payers? Given the collective value of shacks and their rates and levy's it would be an interesting debate. Those in Morgan -and various other townships get recycling bins and more , and the shack owners are effectively paying for local roads infrastructure and facilities that they collectively rarely use. How about council starts acknowledging our contribution to the collective income and give us at least equality in recycling and green waste, instead of just taxing the cash cow!

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Wednesday, 4 June 2025 5:50 PM
To: Tracy Bawden
Subject: IFOR10391-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10391-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Tom

Last name

Zorich

Address

Brenda Park

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

Council rates should cover
waste management services

Manage the budget to include CWMS

Council to focus on Roads Rubbish and public spaces

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Tuesday, 24 June 2025 5:26 PM
To: Tracy Bawden
Subject: IFOR11439-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11439-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

tom

Last name

zorich

Address

Brenda Park

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

CWMS is a separate charge targeting certain rate payers

this operation needs to be incorporated as an general expense within the revenue collected from rate payers

if you wish to make separate charges on usage

then use the same principal for other services should apply

don't target vulnerable ratepayers that have little or no voice around the chamber

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 2 June 2025 4:19 PM
To: Tracy Bawden
Subject: IFOR10413-25 - 18/CON/SUR/1 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10413-25 - 18/CON/SUR/1

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Ashley

Last name

Sewell

Address

, Cowirra 5238

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of

your sewage scheme?

Yes

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Tuesday, 10 June 2025 4:02 PM
To: Tracy Bawden
Subject: IFOR10540-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10540-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Amie

Last name

Johnson

Address

Murbko

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of

your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 9 June 2025 5:29 PM
To: Tracy Bawden
Subject: IFOR10543-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10543-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Naomi

Last name

Belgrade

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Saturday, 7 June 2025 7:40 PM
To: Tracy Bawden
Subject: IFOR10565-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10565-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Alby

Last name

Roelsma

Address

Brenda Park

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

I do not agree to increase the expense

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 2 June 2025 2:01 PM
To: Tracy Bawden
Subject: IFOR10569-25 - 18/CON/SUR/1 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10569-25 - 18/CON/SUR/1

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Lay

Last name

Fox

Address

Truro 5356

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

Yes

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

We wish to add a CWMS connection at our property in Truro.

Tracy Bawden

From: Post Box
Sent: Monday, 2 June 2025 2:50 PM
To: Tracy Bawden
Subject: IEM10572-25 - 18/CON/SUR/10 - FW: Feedback Cowirra waste management cost increase

SynergySoft: IEM10572-25 - 18/CON/SUR/10

Mid Murray Council | PO Box 28, Mannum SA 5238

T: 08 8569 0100

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

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.

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-----Original Message-----

From: cheryl humphris <>

Sent: Monday, 2 June 2025 1:59 PM

To: Post Box <postbox@mid-murray.sa.gov.au>

Subject: Feedback Cowirra waste management cost increase

I am very very upset with the communication I have just received regarding the waste management cost increase.

I feel now that we were misled by council about the expected ongoing cost of connection to the system.

The lack of transparency regarding the outrageous cost is of major concern.

Not only did council decreased the value of my property by locating facilities right outside my home with out consultation but now have raised again by an exorbitant amount the cost of the maintenance of the system.

Last year I called council to ask for receipts of maintenance costs to our system as we had a large increase in cost with no prior notification. I was told a staff member from council would contact me..... I am still waiting.

You don't understand the effects of your decisions on rate payers, we live on no income and will be placed in a position that does not match the information you projected when the system was proposed.

Very unhappy rate payer.

We pay high prices and get no recycling, low or now management of road conditions even though numerous calls have been made.

We are one voice that needs to be heard and more importantly listened to.

Cheryl Humphris

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 2 June 2025 12:55 PM
To: Tracy Bawden
Subject: IFOR10582-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10582-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

SHAUN

Last name

IRVINE

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

This is a system that was forced on us by council, at the time i had a perfectly good, working septic system!

I had installed a system that was used and proven on the Swan River in W.A. this consisted of a 3200L concrete septic tank which overflowed into a 4000L holding tank when the level in this tank hit 3500L and alarm went off and the tank was emptied by a certified waste operator giving me a receipt and proof of waste removal. it was vented above 1956 flood level.

it was a true user pays system. this was deemed " NON COMPLIANT" by council when they wanted the STED system implemented which meant i had to rip out my \$ 7000.00 tank system and join the STED scheme at a cost of around \$ 10,000.00.

in this time i have replaced 2 Flyght sewerage pumps, which were the only pump certified by council at the time. they are no longer available.! So the last one i purchased was \$ 2,200.00.

My costs thus far to connect to the waste management system that council forced on us has been substantial, considering I had a perfectly good working and proven septic system.

And now council wants me to pay \$ 481.00 annually a 65% increase on the system that they introduced because it may need some extra maintenance due to its age.

council has stated in this document that to fully replace the CWMS at Pelican Point would be \$ 1,187,723.00, i cannot see a reason why at any time other

than a natural catastrophic disaster happening. that the whole system would have to be replaced, our system was under water for 4 months and survived. Other than a predicted budget on what ifs! i would want a more substantial explanation for a 65% increase on my CWMS charge.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 2 June 2025 9:06 AM
To: Tracy Bawden
Subject: IFOR10584-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10584-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

John

Last name

Barry

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

This is a crazy increase in price when the cost of living is out of control anyway. This should have been a small increase annually so it's not as noticeable. If we were living on the property full time I could understand the cost but when it's only used occasionally it is ridiculous.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Sunday, 1 June 2025 9:09 AM
To: Tracy Bawden
Subject: IFOR10586-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10586-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Brenton

Last name

Allen

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

What is required for an administration charge other than the annual charge to the resident.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Saturday, 31 May 2025 10:37 AM
To: Tracy Bawden
Subject: IFOR10596-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10596-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Steve

Last name

McCarthur

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

This is robbery! We as shack owners pay more than four times the rates as do private owners next door!

Take the increase from the rates! We get nothing for them, not even rubbish removal!

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Saturday, 31 May 2025 9:19 AM
To: Tracy Bawden
Subject: IFOR10601-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10601-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Robyn

Last name

Allen

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

A price increase of almost double is excessive and ridiculous, as is question 2 where you ask are aware that we hadn't been charged adequately previously.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Friday, 30 May 2025 5:57 PM
To: Tracy Bawden
Subject: IFOR10603-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10603-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Stephen

Last name

Coles

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

Where are our council rates going for Pelican Point besides for our bin collection?

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Friday, 30 May 2025 5:46 PM
To: Tracy Bawden
Subject: IFOR10605-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10605-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

REBECCA

Last name

COLES

Address

Pelican Point

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

Pelican Point is in surplus, we pay the same rates as everybody else and the council only provide to us this as well as the bin service

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Tuesday, 17 June 2025 6:30 AM
To: Tracy Bawden
Subject: IFOR10890-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR10890-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Ben

Last name

Guidotto

Address

Scotts Creek

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of

your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

I believe that the increase is too high for the return work that is supplied for our area, we have no Recycle bins provided and the main road leading into our house road is starting to break away

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Wednesday, 18 June 2025 8:43 AM
To: Tracy Bawden
Subject: Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Jenni

Last name

Hosking

Address

Scotts Creek

Phone

Email

Do you support the increase of the annual charge to ensure that your

scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

I wish to express my total opposition to the proposed increase in the CWMS annual service fee for leaseholders.

The proposed fee hike is excessive and an unfair financial burden on leaseholders. The proposed 47% increase for Scotts Creek is substantial that will disproportionately impact leaseholders. Many residents will struggle to accommodate such a huge increase, on top of the excessive council rates we already pay, making it unreasonable to implement this change. Leaseholders should not be unfairly expected to cover costs that were previously funded from broader Council revenue

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Thursday, 19 June 2025 1:42 PM
To: Tracy Bawden
Subject: IFOR11426-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11426-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

William

Last name

Lees

Address

Scotts Creek

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

Why does this not allow me to paste my response. This is an inadequate attempt at consultation. Before the flood I was denied access to the STED by Council as I hadn't built upon the block though I had to pay for the installment and ongoing costs. After the flood I am not using the block and have no STED infrastructure installed on my block and hence am not connected. Without building at enormous cost I will not be able to use the STED . Why should I be expected to be increasingly be funding something I cannot have access to or use ?

I want it noted I wish to have pasted the Scott's Creek submission which your website has not allowed!

Tracy Bawden

From: Post Box
Sent: Thursday, 19 June 2025 4:49 PM
To: Tracy Bawden
Subject: IEM11427-25 - 18/CON/SUR/10 - FW: Fee Increase concerns

SynergySoft: IEM11427-25 - 18/CON/SUR/10

From:
Sent: Thursday, 19 June 2025 4:48 PM
To: Post Box <postbox@mid-murray.sa.gov.au>
Subject: Fee Increase concerns

Dear Mid Murray Council,

We are writing to formally express our opposition to the proposed increase in the Community Wastewater Management Systems (CWMS) annual service fee for leaseholders. While we understand the Council's responsibility to ensure financial sustainability for these systems, we believe the proposed fee hike is excessive, inequitable, and places an unfair financial burden on leaseholders.

Concerns Regarding Fee Increase

1. **Financial Burden on Leaseholders** The proposed 47% increase in CWMS fees for Scotts Creek is a substantial and sudden adjustment that will disproportionately impact leaseholders. Many residents may struggle to accommodate such a dramatic rise, making it unreasonable to implement this change without a more gradual transition.

2. **Cross-Subsidisation Is Not Permitted for Ratepayers—So Why Leaseholders?** The Council has previously acknowledged that cross-subsidisation—where general ratepayers are required to subsidise CWMS users—is not legally permissible under legislation. However, the current proposal essentially shifts this same burden onto leaseholders, requiring them to absorb indirect administrative costs that were historically covered elsewhere.

This inconsistency raises serious fairness concerns—why is cross-subsidisation prohibited in one case but imposed in another? Leaseholders should not be unfairly expected to cover costs that were previously funded from broader Council revenue.

3. **Existing Surplus Funds Should Be Utilized First** Before imposing significant fee increases, the Council must explore existing financial resources. For example, Scott's Creek currently has a surplus in its CWMS account—funds that could be used to mitigate cost pressures and prevent unnecessary hardship for leaseholders. It is unreasonable to demand additional payments while surplus funds remain under-utilised.

4. **Unjustified Comparison to SA Water Costs** The Council's benchmarking of CWMS fees against SA Water charges fails to consider key factors such as economies of scale. SA Water serves a significantly larger customer base, allowing for more efficient cost distribution. The Council's CWMS

schemes, with far fewer connections per system, do not benefit from the same cost efficiencies and should not be subjected to equivalent pricing structures.

5. Alternative Cost Recovery Measures Should Be Considered Instead of imposing drastic fee hikes, the Council should explore alternative funding solutions—including external grants and revised financial management strategies—that do not unfairly target leaseholders. A gradual, phased approach to fee increases would be far more reasonable than the proposed immediate adjustment.

Request for Consideration Given these concerns, we respectfully urge the Council to:

- Ensure consistency in financial policy by rejecting cross-subsidisation for leaseholders just as it is prohibited for ratepayers.
- Utilize existing surplus funds (such as Scott's Creek's CWMS account) to offset costs before considering fee increases.
- Implement a gradual fee increase rather than an immediate 47% rise.
- Reevaluate the allocation of indirect overhead costs to ensure fairness.
- Explore alternative funding mechanisms that reduce financial strain on leaseholders.

The CWMS system must remain financially sustainable without creating unnecessary hardship for leaseholders. We appreciate your time in reviewing this submission and hope the Council will reconsider the scale and structure of the proposed increase.

Kind regards,

Russell Waller, Kendal Waller & Daniel Cox, Amy Cox

Scotts Creek

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 23 June 2025 11:26 AM
To: Tracy Bawden
Subject: IFOR11429-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11429-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Jan

Last name

Badcock

Address

Blanchetown

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

Yes

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

My understanding was that we paid a large sum in advance at the time of joining the scheme that would cover large fee in the event that the system needed to be upgraded. I believe there is still a large amount of these funds held \$175,000 for this purpose.

I am assuming this is being accounted for as looking at the other CWMS that did not pay an advance sum for future renewals have higher annual service charges to compensate.

Happy that users will be contributing to the future renewal of the schemes assets progressively rather than be hit with a big bill further up the track.

Subject: Submission – Opposition to Proposed CWMS Fee Increase for Scotts Creek

Dear Mid Murray Council,

I am writing as a leaseholder at Scotts Creek to formally oppose the proposed 47% increase in the Community Wastewater Management Systems (CWMS) annual service charge for 2025/26.

While I understand the need to ensure long-term financial sustainability, this proposal raises several critical concerns around fairness, transparency, service equity, and stakeholder consultation. I respectfully submit the following points for Council's consideration:

- 1. Unreasonable Financial Burden**

A 47% increase in one year places undue pressure on leaseholders, many of whom are retirees or on fixed incomes. The pace of this change is unreasonable and fails to allow for financial adjustment. In a cost of living crisis, a phased approach over several years would be more equitable and sustainable.

- 2. Inconsistency in Cross-Subsidisation Policy**

Council has previously stated that cross-subsidisation of CWMS services by general ratepayers is impermissible. Yet this proposed fee hike suggests indirect and administrative costs are now being shifted to leaseholders—raising questions about whether principles of financial policy are being applied consistently.

- 3. Use of Existing Surplus Funds**

Scotts Creek reportedly holds a surplus in its CWMS account. It is difficult to justify increased charges when available funds remain unused. These funds should be applied to alleviate immediate cost pressures and ease the transition to full cost recovery. Also, is there a reason there is no transparency around the amount of surplus funds?

- 4. Inappropriate Benchmarking to SA Water Charges**

SA Water's sewerage network benefits from significant economies of scale that Mid Murray CWMS schemes cannot replicate. Benchmarking fee structures against SA Water does not reflect the localised, small-scale realities of Council-run schemes and sets a misleading standard.

- 5. Inadequate Consultation Period**

A consultation period of less than 25 days is insufficient for meaningful community input on a policy shift of this magnitude. Proper engagement requires time, transparency, and two-way communication—none of which have been adequately demonstrated in this case.

- 6. Declining Services Despite Fee Increases**

Leaseholders at Scotts Creek continue to see reduced services—including limited waste transfer access, no kerbside recycling, and declining road maintenance—despite being asked to pay more. The mismatch between rising costs and service levels undermines confidence in Council's value proposition.

7. Lack of Recycling Services Despite Environmental and Financial Benefits

Scotts Creek leaseholders do not receive kerbside recycling or green waste collection, unlike other areas of the Council. This undermines landfill diversion and sustainability efforts and misses a financial opportunity to reduce waste levies through increased recycling. Providing equitable access to recycling would yield both environmental and economic benefits.

8. Concerns About Transparency and Consultation on Policy Shift

The introduction of full cost attribution, depreciation recovery, and indirect cost allocation represents a major change in Council's budgeting policy. Yet this shift has not been adequately explained to leaseholders, nor has there been prior consultation specific to the financial model now being implemented. We urge Council to engage more openly on structural financial changes affecting communities.

9. Leaseholders' Limited Connection to Indirect Costs

The inclusion of overheads such as internal payroll, records management, or general corporate services may reflect broader operational costs—but many of these services have little direct relevance or benefit to part-time shack leaseholders. We request that Council consider proportionality and material relevance when allocating these costs.

10. Need for Equitable Service-Linked Cost Recovery

If Council aims to recover the full cost of services, it must also ensure that all communities receive service levels commensurate with the fees they are paying. A shift to full cost recovery must be accompanied by a service audit to ensure value is being delivered across all CWMS areas.

11. Impact on Tourism and the Local Economy

Scotts Creek and other shack settlements play a vital role in supporting the Mid Murray region's tourism economy. During peak holiday periods, the Council's population nearly doubles, with many visitors staying in shacks, hiring boats, and supporting local businesses. Increased CWMS charges—without corresponding improvements in services—risk discouraging visitation and investment in these areas. This could have a ripple effect on tourism operators, local employment, and the broader regional economy. Council should consider the economic contribution of shack leaseholders not only as ratepayers, but as enablers of tourism and seasonal growth.

Request for Council Action

In light of the above concerns, I respectfully urge Council to:

- Reject the proposed 47% increase and instead adopt a gradual, phased adjustment model.
- Utilise available surplus funds to offset cost increases at Scotts Creek.
- Apply cross-subsidisation principles consistently and fairly across all service users.

- Reassess the allocation of indirect costs and their applicability to leaseholders.
- Extend the community consultation period and improve stakeholder communication.
- Conduct a review of service equity across shack communities, particularly regarding waste and recycling infrastructure.

Thank you for the opportunity to provide this submission. I hope the feedback of leaseholders will be carefully considered in your decision-making process.

Kind regards,

Gerry Howley

Scotts Creek.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Tuesday, 24 June 2025 5:23 PM
To: Tracy Bawden
Subject: IFOR11438-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11438-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Steve

Last name

Murphy

Address

SCOTTS CREEK

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

As recent retirees who call Scotts Creek home, the proposed 47% increase is not something our forward financial plans can absorb after significant investment in uninsured building repairs and equipment and goods replacement after the 2022 flood. Some of this expense could have been avoided if access roads were not closed at such an early stage. The system must remain financially viable but a staged increase cost program must be utilised.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Tuesday, 24 June 2025 9:25 PM
To: Tracy Bawden
Subject: IFOR11440-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11440-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Adam

Last name

Madrussani

Address

Brenda prk

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

1.Perhaps council can confirm who owns the CMWS system ?

I look forward to your reply

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Saturday, 28 June 2025 6:33 PM
To: Tracy Bawden
Subject: IFOR11712-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11712-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Jim

Last name

Johnstone

Address

Scotts Creek

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

I don't think Shack Owners should have to pay for internal indirect overheads. For the exorbitant amount of rates everyone pay's, surely these charges should come from the rate revenue we pay, after all, we only get one bin collection weekly for the exorbitant amount we pay. The amount of rates I pay, are equal to 2 multi million dollar homes in Burnside!!! It's about time the rates paid by Shack Owners in the North Ward get spent in the North Ward, it's painfully obvious that hasn't happened for years!!!

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 30 June 2025 8:38 AM
To: Tracy Bawden
Subject: IFOR11719-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11719-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Paul

Last name

Bennett

Address

Scotts Creek

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

I formally express my opposition to the proposed increase in the Community Wastewater Management Systems (CWMS) annual service fee for ratepayers. While we understand the Council's responsibility to ensure financial sustainability for these systems, we believe the proposed fee hike is excessive, inequitable, and places an unfair financial burden on ratepayers.

Concerns Regarding Fee Increase

1. Financial Burden on Ratepayers

The proposed 47% increase in CWMS fees for Scotts Creek is a substantial and sudden adjustment that will disproportionately impact leaseholders. Many residents may struggle to accommodate such a dramatic rise, making it unreasonable to implement this change without a more gradual transition.

2. Cross-Subsidisation Is Not Permitted for Ratepayers—So Why Leaseholders who are also ratepayers?

The Council has previously acknowledged that cross-subsidisation—where general ratepayers are required to subsidise CWMS users—is not legally permissible under legislation. However, the current proposal essentially shifts this same burden onto leaseholders/ratepayers, requiring them to absorb indirect administrative costs that were historically covered elsewhere. This inconsistency raises serious fairness concerns—why is cross-subsidisation prohibited in one case but imposed in another? Leaseholders/ratepayers should not be unfairly expected to cover costs that were previously funded from broader Council revenue.

3. Existing Surplus Funds Should Be Utilized First

Before imposing significant fee increases, the Council must explore existing financial resources. For example, Scott's Creek currently has a surplus in its CWMS account—funds that could be used to mitigate cost pressures and prevent unnecessary hardship for leaseholders. It is unreasonable to demand additional payments while surplus funds remain under-utilised.

4. Unjustified Comparison to SA Water Costs

The Council's benchmarking of CWMS fees against SA Water charges fails to consider key factors such as economies of scale. SA Water serves a significantly larger customer base, allowing for more efficient cost distribution. The Council's CWMS schemes, with far fewer connections per system, do not benefit from the same cost efficiencies and should not be subjected to equivalent pricing structures.

5. Alternative Cost Recovery Measures Should Be Considered

Instead of imposing drastic fee hikes, the Council should explore alternative funding solutions—including external grants and revised financial management strategies—that do not unfairly target ratepayers. A gradual, phased approach to fee increases would be far more reasonable than the proposed immediate adjustment.

Request for Consideration

Given these concerns, we respectfully urge the Council to:

- Ensure consistency in financial policy by rejecting cross-subsidisation for leaseholders/ratepayers just as it is prohibited for ratepayers.
- Utilize existing surplus funds (such as Scott's Creek's CWMS account) to offset costs before considering fee increases.
- Implement a gradual fee increase rather than an immediate 47% rise.
- Reevaluate the allocation of indirect overhead costs to ensure fairness.
- Explore alternative funding mechanisms that reduce financial strain on leaseholders.

The CWMS system must remain financially sustainable without creating unnecessary hardship for ratepayers. We appreciate your time in reviewing this

submission and hope the Council will reconsider the scale and structure of the proposed increase.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 30 June 2025 9:21 AM
To: Tracy Bawden
Subject: IFOR11722-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11722-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Kym

Last name

McLean

Address

Scott's Creek

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

No

Any other comments?

We pay the most rates n should not have to pay more. I hope the damage from floods were not in the 5 year average.

Why doesn't Council put out a feedback survey to Rate payers on 'Cost Saving' ideas. Light bulb 💡 ideas, 'Think Tank' etc I certainly would be interested.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 30 June 2025 9:37 AM
To: Tracy Bawden
Subject: IFOR11723-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11723-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

michael

Last name

schefe

Address

141 scotts creek shack rd morgan, SA, Australia

Phone

0403735819

Email

mschefe@hotmail.com

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

Our council rates are already a ridiculous amount! We get nothing back for that money. How about putting some of the shack owners council rates back into the shack areas. That might help for next time you ask the shack owners for more money.

To view all of this form's submissions, visit https://engagement.mid-murray.sa.gov.au/index.php/dashboard/reports/forms_new/data/12

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Mid Murray Your Say.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 30 June 2025 10:31 AM
To: Tracy Bawden
Subject: IFOR11724-25 - 18/CON/SUR/10 - Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

SynergySoft: IFOR11724-25 - 18/CON/SUR/10

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Brad

Last name

Mucklow

Address

SCOTTS CREEK

Phone

Email

Do you support the increase of the annual charge to ensure that your scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

Any other comments?

A proposed increase of 47% over consultation of less than 25 days is disappointing. Significant revenue is collected by the MMC however there have been a reduction in the services provided. No recycling bins, potential increase in waste management charges, reduced maintenance of Shack road.

Tracy Bawden

From: Social Pinpoint <noreply@socialpinpoint.com>
Sent: Monday, 30 June 2025 11:15 AM
To: Tracy Bawden
Subject: Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

Feedback Form - CWMS Annual Business Plan 2025-2026 Form Submission

There has been a submission of the form Feedback Form - CWMS Annual Business Plan 2025-2026 through your Mid Murray Your Say website.

First Name

Stephen

Last name

Nicolson

Address

SCOTTS CREEK

Phone

Email

Do you support the increase of the annual charge to ensure that your

scheme has adequate funds to perform major repair and replacement of your sewage scheme?

No

Do you understand that in the past the CWMS Schemes have not been charged an appropriate proportion of administrative expenses?

Yes

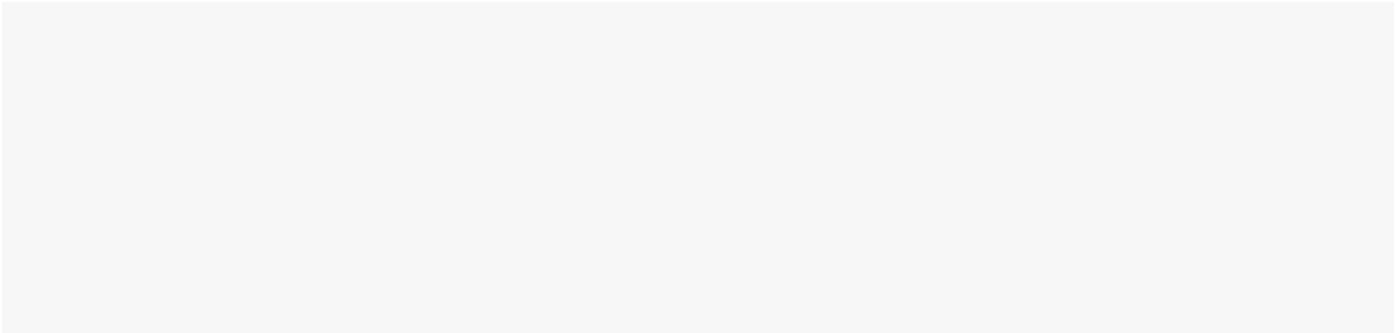
Any other comments?

In the past all costs associated with particular schemes have been partially attributed to each scheme. Scott's Creek scheme has paid all of their portion and are running with a positive balance, so why the need to change? Normal rates etc would have an "internal indirect/overhead cost" not accounted for - this is the part of the overall cost of running any business which is set in the rating costs. Each area of council, wages, procurement would have associated costs which come out of the "running" purse, as would the admin costs for running any scheme.

All expenses for maintenance and pumps have been deducted from the scheme, right down to the cost of a washer, and where it was purchased.

In the initial set up of the scheme, a State Government Grant/Loan was obtained and the choice to pay up front in full or over 10 years, with appropriate interest added, was offered. Why would this not be the case in the need for replacement of the system? Parts of the system have already been replaced- pumps, blowers etc. The likely hood that the entire system needs replacing all at the same time would be virtually zero- if you replace something just because it has been depreciated down to zero and no longer tax deductible, then there is the elephant in the room.

Who receives the depreciation on the asset? Probably council- even though the scheme is wholly funded by Scotts Creek and only managed by council with no choice on our behalf.



To: Mid Murray Council

30/06/2025

Subject: Scotts Creek, Brenda Park and Pelican Point opposition to Proposed CWMS Fee Increase for Ratepayers

Dear Mid Murray Council,

We are writing to formally express our opposition to the proposed increase in the Community Wastewater Management Systems (CWMS) annual service fee for ratepayers.

We also wish to point out that the schemes within our three associations were funded by the ratepayers when constructed and not by local or state governments grants.

We should not be charged depreciation on an asset we have paid for. A sinking fund should be established for each system and the amount charged per annum based on the recommendations for each system. The pipes and tanks have a much longer life span than the 40 years being suggested leaving replacement of pumps and electronics within each system as the shorter life components of the system.

We also wish to make the statement that the property owners within the three shack associations pay a considerably higher amount in rates than general rate payers and receive little in return when compared to general rate payers within the townships. We feel that the rates paid by shack owners well and truly cover the indirect/overhead costs to manage the contractors maintaining our CWMS systems.

While we understand the Council's responsibility to ensure financial sustainability for these systems, we believe the proposed fee hike is excessive, inequitable, and places an unfair financial burden on ratepayers.

Concerns Regarding Fee Increase

1. Financial Burden on ratepayers.

The proposed 37- 47% increase in CWMS fees for Brenda Park, Scotts Creek and Pelican Point is a substantial and sudden adjustment that will disproportionately impact ratepayers. Many residents may struggle to accommodate such a dramatic rise, making it unreasonable to implement this change without a more gradual transition.

2. CWMS Ratepayers should not be unfairly expected to cover costs that were previously funded from broader Council revenue raised from CWMS ratepayers who are paying more than their fair share of rates given the lack of services received for those rates. In essence we are paying for all of our services. Bin collection, Sewage disposal, road maintenance, repairs and improvements, signage, lighting etc. The shack owners represent little to zero cost when compared to the revenue they provide council.

3. Existing Surplus Funds Should Be Utilized First

Before imposing significant fee increases, the Council must explore existing financial resources. For example, Scott's Creek currently has a surplus in its CWMS account —funds that could be used to mitigate

cost pressures and prevent unnecessary hardship for leaseholders. It is unreasonable to demand additional payments while surplus funds remain under-utilised.

4. Unjustified Comparison to SA Water Costs

The Council's benchmarking of CWMS fees against SA Water charges fails to consider key factors such as economies of scale. SA Water serves a significantly larger customer base, allowing for more efficient cost distribution. The Council's CWMS schemes, with far fewer connections per system, do not benefit from the same cost efficiencies and should not be subjected to equivalent pricing structures.

5. Alternative Cost Recovery Measures Should Be Considered

Instead of imposing drastic fee hikes, the Council should explore alternative funding solutions—including external grants and revised financial management strategies—that do not unfairly target ratepayers. A gradual, phased approach to fee increases would be far more reasonable than the proposed immediate adjustment.

Request for Consideration

Given these concerns, we respectfully urge the Council to:

- Provide a copy of deterioration reports on our three CWMS systems.
- Provide copies of accounts for the last 10 years.
- Guarantee surplus funds for each system remain in that system.
- Utilize existing surplus funds to offset costs before considering fee increases.
- Implement a gradual fee increase rather than an immediate 47% rise.
- Consider a sinking fund and high interest accounts for each system.
- Reevaluate the allocation of indirect overhead costs to ensure fairness.
- Explore alternative funding mechanisms that reduce financial strain on ratepayers.

The CWMS system must remain financially sustainable without creating unnecessary hardship for CWMS ratepayers. We appreciate your time in reviewing this submission and hope the Council will reconsider the scale and structure of the proposed increase.

Sincerely,

Mark Rademacher

Vice Chairperson

Brena Park

Jim Johnstone

President

Scotts Creek

Shaun Irvine

President

Pelican Point