ACT Retirement Village Residents Association Inc.

To: provide independent information, advice, advocacy and representation

SUBMISSION TO DRAFT REPORT:
REVIEW OF SEWERAGE TARIFF AND LIQUID TRADE WASTE CHARGING

ACT RETIREMENT VILLAGES

The ACT Retirement Village Residents Association (ACT RVRA) is a community organisation representing the interests of current and prospective residents living in 42 retirement villages across the ACT.

Although retirement villages provide accommodation for seniors aged 55 years and older, the national average age of entry to a retirement village is now 76 years, and the average age of residents is 81 years. The retirement village 'customer' is the business associated with the land title rather than the end user who, in this case, is a senior resident living in their home in a retirement village.

DRAFT REPORT

The Association cautiously supports the Commission's draft proposal for a revised tariff structure that moves away from flushing fixtures towards charges based on water meter size and estimated waste water discharge. We are pleased that the Review has recognised the unfair nature of the current system based on flushable fixtures. Many retirement village residents are currently disadvantaged because their unit has 2 flushable fixtures but only one is in daily use.

ACT RVRA COMMENT

The Draft Report cited hotels as the only form of accommodation in the analysis of various scenarios for non-resident sewerage tariffs. Box 8.1 of the Draft Report indicated that retirement villages are not represented in the analysis because they consist of multiple dwellings that "aggregate their water consumption across multiple dwellings" and are billed through a single account to the business. This is an operational cost that the business recoups through residents' recurrent charges.

Retirement villages accommodate singles or couples rather than larger families and are currently charged similar to or more than residential properties. Given the review is expected to be revenue neutral, the future charging regime for retirement villages should aim to improve the cost compared with residential so not to further disadvantage retirement village residents.

Janine Lewis
President
15 October 2026