

TMC WITCHCLIFFE PTY LTD

Witchcliffe Eco Village Sewage Services



Post Audit / Review Implementation Plan

21st July 2024

Written by Tony Johansen

BRIEF

In accordance with the Water Services License WL50, an operational Audit was undertaken with respect to sewage services to the Witchcliffe Eco Village 7km south of Margaret River. The audit was conducted by Quantum Assurance, appointed by the Economic Review Authority (ERA).

As required by the Audit Review Guidelines, TMC Witchcliffe is required to submit a Post Audit Review Implementation plan (PARIP), detailing the proposed actions to address recommendations made by Quantum Assurance.

TMC Witchcliffe Pty Ltd (TMC) is a startup company in its early stages of operation presently undertaking validation test work on two process reactors 15kL/d and 40kL/d following permits provided by Department of Environment and water Regulation (DEWR) and Department of Health (DoH) Western Australia. License to operate is anticipated in the 3rd quarter of 2024.

TMC has no employees during this startup period operating as an individual owner/operator engaging contractors where and when required.

All responsibilities for plant management/operations/maintenance Tony Johansen Director TMC Witchcliffe Pty Ltd

Table of Current Audit Non- Compliances and Recommendations

A. Resolved during current audit period

Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Date Resolved (& management action taken)
	Nil	

B. Unresolved at end of current audit period

Recommendation (no./year)	Non-Compliance/Controls Improvement (Rating/Licence obligation ref. and obligation/Non-compliance or inadequacy of control)	Auditor's Recommendation	Action taken by the licensee by end of audit period	Completion Date
1/01/2024	Family Violence Policy D/3 – No controls evident/ Non-compliant – Moderate impact Obligations 10, 191, 192, 193, 198	a) TMC Witchcliffe should develop a Family Violence Policy, include this on the Website for residents and make this available to customers in hardcopy upon request and free of charge.	Family Violence policy to be written	1/12/2024
		b) There should also be a link to the current version of the <i>Water Services Code of Practice (Family Violence) 2020</i> as it appears on the Department of Justice – Government WA website.	Links will be included	1/12/2024
1/02/2024	Energy and Water Ombudsman D3 - Not performed – controls not assessed in the audit/ Non-compliant – Moderate impact Obligation 92, 153	As required by Clause 6.2.1 of the Water Licence, TMC Witchcliffe should become a member of the Energy and Water Ombudsman scheme in WA.	TMC will apply for membership Energy and Water Ombudsman scheme	1/12/2024
		The Website should include information and the form to apply for new sewerage connections, including the Standard Terms and Conditions of the Operators Wastewater Services.	TMC Witchcliffe to develop a website specifically to this project	1/12/2024

<p style="text-align: center;">1/04/2024</p>	<p>Information to be included on Invoices</p> <p>C3 – Controls inadequate/ Non-compliant – Moderate impact</p> <p>Obligation 102A</p> <p><i>Code of Conduct (Customer Service Standards) 2018 – Clause 13(6) - Each bill must contain the prescribed information.</i></p> <p>The audit reviewed a sample of 10 tax invoices issued during the audit period. These tax invoices contained contact information but this does not include the information stipulated in clause 13(6) of the Code of Conduct as follows:</p> <ul style="list-style-type: none"> • Telephone number for complaints; 	<p>The invoices to customers should include the “prescribed information” in the <i>Water Services Code of Conduct (Customer Service Standards) 2018</i>, including:</p> <ul style="list-style-type: none"> • Telephone number for complaints; • Freecall telephone number for the office of the water services ombudsman; • A statement that the website contains information about estimates, meter reading and testing, complaints and review; and • A statement that the bill can be reviewed in accordance with the licensee’s review procedure mentioned in clause 20. 	<p>Modifications to invoice template will be made</p> <p>Phone number to be included</p> <p>Contact number of service ombasman will be included</p> <p>Will be included in the website to be developed</p> <p>Statements will be included</p>	<p>1/12/2024</p> <p>1/12/2024</p> <p>1/12/2024</p> <p>1/12/2024</p> <p>1/12/2024</p>
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<p>1/05/2024</p>	<p>Bill Review</p> <p>C3 – Controls inadequate/ Non-compliant – Moderate impact</p> <p>Obligations 114, 115, 116, 153, 154</p> <p><i>Code of Conduct (Customer Service Standards) 2018 – Clause 20(2) - The license must have a written procedure for the review of a bill on the customer's request.</i></p> <p><i>Clause 20(3) and (6) - The review procedure in clause 20(2) must include the specified information and be available on the licensee's website and a hardcopy provided to a customer upon request at no charge.</i></p>	<p>a) The Standard Terms and Conditions of the Operators Wastewater Services should include a written procedure for review of a bill on the customer's request, including:</p> <ul style="list-style-type: none"> • Review of Outcome – Undercharged bill and Overcharged bill (clause 20(3)(b); and • Appeals and Complaints, including option to apply to the Energy and Water Ombudsman (clause 20(3)(c)). <p>b) The bill review procedure should be available on the website and in hardcopy upon request.</p>	<p>Bill review procedure to be developed</p> <p>Reviews of billing errors to be included</p> <p>Appeals and complaints to be included</p> <p>Bill review procedure to be added to the web site</p>	<p>1/12/2024</p> <p>1/12/2024</p> <p>1/12/2024</p>
<p>1/06/2024</p>	<p>Bill Payment Options</p> <p>C1 – Inadequate controls – significant improvement required / Compliant</p>	<p>The invoices to customers and the Standard Terms and Conditions of the Operators Wastewater Services should include the payment options. These include in person, Centrepay, by mail, via the internet, telephone or by direct debit. Also, that any fees or charges incurred with a particular payment method will be communicated to the customer prior to accepting payment.</p>	<p>Standard Terms and conditions document to be reviewed</p>	<p>1/12/2024</p>

1/06/2024	<p>Bill Payment Options</p> <p><i>C1 – Inadequate controls – significant improvement required / Compliant</i></p>	<p>The invoices to customers and the Standard Terms and Conditions of the Operators Wastewater Services should include the payment options. These include in person, Centrepay, by mail, via the internet, telephone or by direct debit. Also, that any fees or charges incurred with a particular payment method will be communicated to the customer prior to accepting payment.</p>	Standard Terms and conditions document to be reviewed	1/12/2024
1/07/2024	<p>Financial Hardship Policy on Website</p> <p><i>C/3 – Controls inadequate/ Non-compliant – Moderate impact</i></p>	The Financial Hardship Policy should be available on the Website.	Will be added to the website	1/12/2024
1/08/2024	<p>Supply Interruptions</p> <p><i>C2 – Inadequate controls – significant improvement required / Non-compliant – Minor impact</i></p>	The existing practices, responsibilities and timing for for dealing with and minimising the impact of a burst, leak or blockage in the sewerage works and non-potable water supply should be documented in a brief written procedure.	Breakdown procedures to be included	1/12/2024

<p>1/09/2024</p>	<p>Complaints Procedure</p> <p>C3 – Controls inadequate/ Non-compliant – Moderate impact</p> <p>Obligation 148A,149</p> <p>The Technical Director confirmed that a hardcopy would be provided to a customer upon request and at no charge.</p>	<p>a) TMC Witchcliffe's Customer Complaints Procedure in the Standard Terms and Conditions of the Operators Wastewater Services should include the option for customers to apply to the State Administrative Tribunal for review of a complaint.</p> <p>b) TMC Witchcliffe's Customer Complaints Procedure in the Standard Terms and Conditions of the Operators Wastewater Services should be available on the website.</p>	<p>Customer complaints procedure to be reviewed</p> <p>Customer complaints procedure will be added to the website</p>	<p>1/12/2024</p> <p>1/12/2024</p> <p>1/12/2024</p>
<p>1/10/2024</p>	<p>Website Link to Code of Conduct</p> <p>C3 – Controls inadequate/ Non-compliant – Moderate impact</p>	<p>The website should include a link to the current Water Services Code of Conduct (Customer Service Standards) 2018 as included on the www.legislation.wa.gov.au website.</p>	<p>Links to the Water Services code of Conduct to be included in the website</p>	<p>1/12/2024</p>

A. Resolved during current review period				
Reference (no./year)	Asset System Deficiency (AMS Component/Effectiveness Criteria/Details)	Auditor's Recommendation	Management Action taken by end of review period	
	Nil			
B. Unresolved during current review period				
Reference (no./year)	Asset System Deficiency (AMS Component/Rating/Effectiveness Criteria/Details)	Auditor's Recommendation	Action Proposed to be taken by Licensee	Completion Date
1/12/2024	<p>Asset Management Plan</p> <p><i>Processes: Asset Planning and Review of Asset Management System</i></p> <p><i>Criteria 1.1: Asset management plan covers the processes in this table.</i></p> <p><i>Criteria 1.3: Service levels are defined in the Asset Management Plan.</i></p> <p><i>Criteria 1.9: Asset management plan is regularly reviewed and updated.</i></p>	<p>a) The AMP requires updating now that the Scheme is operating. The update should provide further detail about operations and maintenance of the system and include the approach to Risk Management and Contingency Planning.</p> <p>b) The AMP should be updated to include Service Levels as per the Standard Terms and Conditions of the Operators Wastewater Services and requirements of the Recycled Water Management Plan, including how these are reported and monitored.</p> <p>c) The AMP should include a revision table to record updates. The inclusion of numbered headings will also assist future referencing for review.</p>	<p>Operations Manual will include operational procedures, maintenance and contingency planning</p> <p>Update of documents</p> <p>Update of records</p>	<p>1/12/2024</p> <p>1/12/2024</p> <p>1/12/2024</p>

13/2024	Risk Management <i>Processes: Asset Planning, Asset Maintenance and Risk Management</i>	a) Now the Scheme is operating, an asset risk assessment process needs to be implemented to assess the likelihood and consequence of asset failure and to prioritise maintenance tasks. An approach similar to the Health Risk Assessment in Appendix E of the Recycled Water Quality Management Plan is recommended.	Maintenance of assets and assessment of likely failure to be formulated	1/12/2024
C2	<i>Criteria 1.8 - Likelihood and consequences of asset failure are predicted.</i>	b) The risks, ratings, actions and status should be documented in a Risk Register that is reviewed at least annually.	Risk register to be written	1/12/2024
14/2024	Operations and Maintenance Documentation <i>Processes: Asset Disposal, Asset Operations and Asset Maintenance</i>			
C2	<i>Criteria 3.2: The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken.</i>	a) The regular routine operations and maintenance tasks should be determined and a checklist with tasks and frequency prepared to assist with tracking completion and entry of other (less routine) observations and completion of required actions.	Daily, weekly, monthly and annual maintenance schedules to be written	1/12/2024
	<i>Criteria 5.1: Operational policies and procedures are documented and linked to service levels required.</i>	b) As planned, the measurement and monitoring of operating costs including a financial statement and budget/actuals reporting, should be completed.	This is a requirement of the developer in the agreement. These are provided July 1 each year	1/07/2024
	<i>Criteria 5.2: Risk management is applied to prioritise operations tasks.</i>	c) An annual schedule of more specialist/major maintenance requirements should be developed and tracked for completion.	As per above section a.	1/12/2024

<p>15/2024</p> <p>C2</p>	<p>Staff Resources <i>Process: Asset Operations</i></p> <p><i>Criteria 5.6: Staff resources are adequate and staff receive training commensurate with their responsibilities.</i></p> <p>A plumbing contractor attends to the sewer collection system.</p>	<p>a) The Operations Plan should be updated in line with development of the operations manual and checklist of activities to demonstrate the staffing levels are adequate.</p> <p>b) Completion of training requirements for operators is required together with a system for tracking training progress/completion.</p>	<p>Operations plan will be updated</p> <p>Contractors onsite are formally qualified trades people with TAFE or further certification and /or licenses from trades board. These certificates are formally reviewed by the site manager and copies maintained on site register.</p>	<p>1/12/2024</p> <p>1/12/2024</p>
<p>16/2024</p>	<p>Management Reporting <i>Process: Asset Management Information System</i></p>	<p>Management reports to monitor the licence obligations should be implemented such as reporting from a Compliance Register of obligations, responsibility, status, any actions required, due dates and completion.</p>	<p>Management reports to link with site permits</p>	<p>1/12/2024</p>
<p>17/2024</p>	<p>Contingency Plan <i>Process: Contingency Planning</i></p>	<p>The contingency plan for the response in the event of a failure of the bore, waste water treatment plant or distribution pipes should be documented, including testing of the plan on an annual basis.</p>	<p>Contingency plans to be developed</p>	<p>1/12/2024</p>