

# Feedback from houseboat greywater information sessions – 2015



## Following are responses to questions raised at GMW's houseboat information sessions conducted at each of the Eildon marinas in January 2015

- 1. What if I'm having issues fitting a system to a smaller houseboat?**

GMW is recommending owners of smaller vessels contact system suppliers to discuss how a system can be fitted to their vessel. GMW is happy to hear from boat owners who are advised that fitting is not possible or would impact on the safe operation of the vessel.
- 2. Can GMW provide exemption to smaller basic vessels or vessels under a nominated value from fitting a greywater treatment system?**

The Water (Lake Eildon Recreational Area) (Houseboats) Regulations 2013 do not provide an exemption for smaller vessels. GMW does not have discretion to grant exemptions to the regulations.
- 3. Can other treatment systems, other than those listed on the GMW website be used?**

The houseboat regulations require greywater treatment systems to meet the water discharge standards specified in AS4995-2009 and also listed in the regulations. GMW would require any new unit to demonstrate the discharge levels can be met through testing at an accredited NATA testing laboratory. GMW would approve houseboats fitted with any system that is able to meet this requirement.
- 4. We've heard none of the systems fitted are working correctly, is that so?**

GMW has advice from the system manufacturers and system owners that most fitted systems are working effectively. GMW has also been advised that the manufacturers are working with any boat owners that have concerns with the function of their systems to resolve any outstanding issues.
- 5. Will boat owners with systems that are not working correctly be penalised?**

Boat owners need to work with system manufacturers to ensure that any operating faults are being addressed. Boat owners who have not advised system manufacturers of system faults will be in breach of the houseboat regulations and may be penalised by GMW. GMW will be discussing testing of discharge water quality with unit manufacturers to develop a compliance monitoring program for existing systems.
- 6. Why wasn't education introduced as a first step?**

Information relating to requirements for greywater has been shared at regular stakeholder meetings and on the GMW website and in newsletters for many years. In 2002 GMW produced the houseboat licence agreement document, which is required to be signed by all houseboat licence holders. This document included information relating to the introduction of requirements for control of greywater discharge for houseboats. GMW has also provided information regarding the use of low phosphate detergents to reduce contribution to blue green algae blooms. In 2008 and again in 2010

representatives from EPA in South Australia attended stakeholder meetings at the Eildon Boat Club to explain regulations introduced in South Australia and progress with implementation of greywater treatment requirements.

**7. Why doesn't GMW allow connection of kitchen waste to the blackwater tank and continued discharge of shower water to the lake?**

The 2013 Houseboat Regulations provide for collection of kitchen waste to blackwater tanks, but do not allow continuing discharge of greywater (including shower water) to the lake. GMW supports this position and does not believe licensing of houseboats on Lake Eildon with direct discharge is an acceptable practice. Under the *Safe Drinking Water Act 2003* GMW has responsibility to develop and implement risk management plans for storages under our control. The plan for Lake Eildon has identified some controls specific to houseboats are required to reduce the risk to water quality and public health. The Environment Protection Authority and Department of Health agree that discharge of untreated greywater is not best practice. The Department of Health has also confirmed that the public health risks to people who come into contact with greywater are well documented.

**8. Why didn't GMW upgrade infrastructure to deal with greywater and recover costs from houseboat owners?**

Cost estimates for upgrade of effluent systems, including Goulburn Valley Water Eildon treatment plant to allow collection of all grey water, are conservatively estimated at \$20 million. Additional cost would also be incurred by every individual boat owner to fully contain all greywater. Greywater contained and stored for long periods without treatment would also create health and odour risks for boat owners and become more difficult to treat at the Eildon wastewater treatment system

**9. Why is greywater an issue now when many boat owners have been using the lake for 40 years without any health impacts?**

In the late 1990s, GMW reviewed its operation and management of houseboat wastewater. The issue of sillage or greywater management was identified as a potential water quality risk. It was identified that as houseboats discharge untreated greywater directly to the lake and houseboating activity tends to be congregated either in marinas or inlets, that the houseboat occupants are likely to be in contact with untreated greywater. According to Department of Health and Environment Protection Authority, greywater can contain high levels of pathogens and nutrients, so it can pose a significant risk to public health and the lake environment.

GMW supports Victoria becoming a leader in water based recreation management. By introducing greywater management to houseboats, GMW seeks to improve the water quality within the lake so that the recreational community has a more enjoyable experience while at Lake Eildon through better onboard facilities as well as reduced risk of BGA blooms and to public health.

**10. What is GMW doing about pollution from other sources such as camping, cropping and grazing?**

GMW continues to look at opportunities to reduce water quality impacts. A number of actions relating to water quality risk are identified in the 2012 Land & On-Water Management Plan for Lake

Eildon and GMW is working with partner agencies and community representatives to implement those actions. Dealing with houseboat greywater discharge and upgrading of the Jerusalem Creek pump out barge are also actions in the plan.

**11. Can GMW provide evidence in the form of water quality testing results from the last 10 years and can GMW prove greywater from houseboats is a contributor to blue green algae blooms?**

There is no question that houseboat greywater has the potential to create a health risk for anyone having contact with the untreated discharge. Greywater also contributes nutrients to the storage. It is not possible to quantify what the percentage of contribution from houseboats is compared to discharges from other sources.

**12. Is infrastructure capable of achieving fitting of units to all vessels by 2020?**

Since the information sessions GMW has had discussions with the representatives from the houseboat maintenance industry and also greywater unit manufacturers. These discussions have confirmed that it would be possible to have sufficient greywater units manufactured to have all vessels fitted by 2020. Capacity of slipping and maintenance facilities is limited and will require careful coordination and consideration of short term slipping options to achieve compliance. GMW remains committed to achieving the 1 July 2020 date and is also considering measures to be implemented for vessels that are not compliant after this date.

**13. Who is the owner of the 2013 Houseboat Regulations and who can change them?**

The 2013 Houseboat Regulations were made under sections 122ZF and 324 of the Water Act 1989 by the Governor in Council at the request of the then Victorian Water Minister.

**14. Could discharge be restricted to the middle of the lake and not in marinas?**

The regulations do not allow for discharge to the lake and this option is not supported by GMW.

**15. Can Eildon Boat Club members fit any unit using the club's slipping facilities?**

The club's manager has confirmed there are no restrictions on access to its maintenance facilities for any of the greywater treatment unit suppliers or installers.

**16. Are the regulations for greywater the same in South Australia and New South Wales?**

South Australia has regulations in place that require collection or treatment of greywater ([http://www.epa.sa.gov.au/environmental\\_info/water\\_quality/programs/grey\\_and\\_black\\_water\\_discharge/grey\\_water](http://www.epa.sa.gov.au/environmental_info/water_quality/programs/grey_and_black_water_discharge/grey_water)). NSW has requirements for containment or treatment of greywater for all commercial hire houseboat operators. There are no specific requirements for recreational vessels. However, all vessel operators must ensure they do not pollute. (<http://www.rms.nsw.gov.au/about/environment/environmental-compliance/vessel-waste-disposal/sewage-greywater.html> )

**17. Is swimming allowed in harbours?**

There are no GMW restrictions on swimming in harbours, however GMW advises that swimming in areas where concentrated discharge of greywater occurs does create a high risk of contact with



harmful pathogens. Water sampling over a number of years from within marina areas also confirms that high levels of blue green algae often occur in sheltered bays where houseboats are moored.

**18. If I slip my houseboat now does a greywater treatment system have to be fitted?**

The regulations do not require vessels being slipped to fit a grey water treatment unit, however, GMW recommends boat owners take the opportunity to install below deck plumbing while vessels are out of the water. A greywater treatment system could then be fitted prior to 1 July 2020 without the need to slip the vessel again.

**19. Can GMW amend the date when transfers will not be approved as value of vessels is being impacted?**

The transfer date is contained in the 2013 Houseboat Regulations. GMW does not have discretion to grant exemptions to these regulations. GMW will not be approving transfer of a houseboat licence after 1 July 2015 unless an approved greywater treatment system is fitted.

**20. Why can't units be fitted when slipping is due instead of having dates in the regulations?**

GMW encourages boat owners to fit a greywater treatment unit when they next slip their vessel for maintenance or as part of the compulsory slipping program. This will avoid additional slipping costs for the vessel to be slipped again prior to 1 July 2020.

**21. Can GMW provide assurance that the regulations won't change once units are fitted to require something further?**

The current regulations will need to be renewed by 2023. No changes to greywater requirements are expected.

**22. Why aren't units required to meet the Australian Standard AS4995-2009?**

Units are required to meet the discharge standards for grey water and testing requirements specified in the Australian Standard AS4995-2009.

**23. Will testing of discharge water be required?**

GMW plans to implement the following to confirm units continue to function in accordance with the regulations

- a. Annual service certificate from authorised service agent to be provided to GMW
- b. Random sampling by GMW and laboratory testing of discharge water

**24. Will GMW review timeframe for compliance if low lake levels reduce slipping capacity?**

GMW will consider requirements for this and appropriate actions if the situation arises. We will also be having discussions with providers of boat slipping facilities to confirm capacity to install greywater systems before 1 July 2020

**25. What is being done about vessels that have not complied with GMW's compulsory inspection program?**

GMW has recently sent letters to a number of boat owners who have failed to respond to repeated requests for slipping reports to be completed. Licences for these vessels will not be renewed after 30 June 2015 unless a report is received.

**26. Do spas have to be connected to greywater systems?**

Yes, all on-board grey water must be collected and treated prior to discharge to Lake Eildon.

**27. What are the requirements for outdoor showers on rear decks?**

Outdoor showers on rear decks are currently not required to be connected to greywater collection & treatment systems. GMW is considering if this needs to change.

**28. Can existing vessels be fitted with a greywater system on the water and guarding completed when vessel is next slipped?**

The 2013 Houseboat Regulations require all vessels to be fitted with greywater treatment systems by 1 July 2020, including appropriate guarding of plumbing and storage tanks.

**29. Will GMW have more feedback sessions with unit manufacturers present?**

GMW will be meeting with unit manufacturers in the near future and will raise this for discussion. We will be providing further information sessions similar to the January sessions between now and 2020.

**30. If units are found to be not delivering the required discharge standard will compliance costs be passed on to houseboat owners?**

GMW will be having further discussion with treatment system manufacturers and will continue to update houseboat owners.

**31. Some vessels have been slipped in the last two years. Do they have to slip again to have a unit fitted for sale after 1 July 2015?**

The 2013 Houseboat Regulations require boats to have a greywater treatment system for GMW to approve a licence transfer after 1 July 2015. If vessels need to be slipped to have a treatment system fitted, an additional slip will be required to allow GMW to transfer the licence.

**32. Do units need to run all the time to operate effectively?**

Boat owners should consult with each of the unit manufacturers to determine system requirements. GMW will continue to provide updated information on implementation progress on our website.

**33. What will GMW do if systems are found to be not working in five years' time?**

Questions about treatment system warranties are best directed to system manufacturers. GMW will continue to monitor functioning of units in conjunction with manufacturers to ensure discharge standards are being achieved.



**34. What penalties will apply to vessels not fitted by July 2020?**

GMW remains committed to achieving the 1 July 2020 date and is also considering measures to be implemented for vessels that are not compliant after this date.