

RETAIL FOOD PREPARATION – NO COOKING

Background

As detailed in the Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements*, activities that generate liquid trade waste for discharge into Icon Water's Sewerage Network **must** comply with specific requirements.

Retail food activities are sub-divided into two groups:

- activities that **do not** generate greasy/oily types of waste (referred to as “No Cooking”);
- activities that **do** generate greasy/oily types of waste (referred to as “Hot Food” or “Cooking”).

Any capitalised terms used and not defined in this Guide Note have the same meaning as in Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements*.

Purpose

The purpose of this Guide Note is to provide detail on the specific requirements for liquid trade waste generated from retail food activities that **do not** generate greasy/oily waste, so that compliant waste can be approved for ongoing acceptance into Icon Water's Sewerage Network.

Compliance

The Trade Waste Customer remains responsible and liable for ensuring compliance with this Guide Note even if the occupier of the premises is another party or entity.

In the event that the Trade Waste Customer or the occupier of the premises fails to comply with this Guide Note, Icon Water may take any and all corrective actions as specified in the Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements* and the Liquid Trade Waste Negotiated Contract.

Guidance

For the purposes of these requirements, “No Cooking” means that food is not cooked and that greasy/oily wastes are not generated as a result of:

- preparing and/or serving food on the premises
- the washing of cookware, dishes, utensils or cutlery on the premises.

Food that is heated only (e.g. using a pie warmer or sandwich press) and served in disposable/take-away containers is incorporated into “No Cooking”.

Some businesses may serve greasy food without generating greasy wastewater. For example, some sushi bars do not cook ingredients on site, which means they don't generate any greasy wastewater. In these situations, we will perform an assessment of all food, preparation processes, and kitchen equipment.

Note: Premises that fit the No Cooking definition may not require a grease trap. However, it is important to know the scale, and type, of any planned activities. If there are plans to cook or serve dine-in food in the future, a grease trap must be installed.

Written declaration from Trade Waste Customer

As part of an application to discharge liquid trade waste, Trade Waste Customers must provide a written declaration that includes/attests to the following:

- there will be No Cooking on site
- no greasy or oily cookware, dishes, utensils, or cutlery will be washed up (e.g. via dishwasher, sinks) on site
- a menu of the food that is planned to be offered.

There is a “No Cooking” template declaration form to download from our website that should be used for this purpose.

Excluded substances/equipment/processes

- Food waste disposal units (aka ‘macerators’, ‘in-sinkerators’, ‘in-sink food waste disposers’, ‘garbage grinders’, ‘composters’, ‘digestors’): We will not provide a Liquid Trade Waste Negotiated Contract to any premises that use these devices
- Bacterial, enzyme and/or odour controlling agents: The use of these is prohibited and they must not be discharged directly to, or via, pre-treatment devices into Icon Water’s Sewerage Network
- Wastewater containing chemicals or substances above our acceptance criteria (or not listed) in Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements*.

Pre-treatment requirements

The following table describes pre-treatment requirements that apply to **all** retail food processes that **do not** generate greasy/oily waste.

Table 1. Pre-treatment devices: For all retail food processes that *do not* generate greasy/oily waste

Pre-treatment Device	Details
In-sink dry basket arrestor	Must be provided for all sinks in food preparation and handling areas. We recognise that some businesses may experience problems with the installation of these screens. If so, sink strainers must be used as an alternative. During our inspections/audits, we will check whether sink strainers have been installed. If strainers are not in use, we will require that an in-sink dry basket arrestor be provided.
In-floor dry basket arrestor¹	Must be installed for any floor waste outlet, located in the food preparation and handling area (where applicable). The arrestor needs to be maintained regularly (e.g. removed, scraped and cleaned) to ensure the unit is operating properly.

¹ A mobile food van without floor waste outlets will not require the installation of a dry basket arrestor.

Other waste management

Oil and Fats

Collected used oil and fats must not be disposed of into Icon Water's Sewerage Network and should be removed from the premises by an ACT EPA authorised oil and fat recycler.

Garbage bin cleaning

Outdoor waste enclosures must be roofed and bunded to prevent the ingress of stormwater to Icon Water's Sewerage Network. When there is a grease trap installed on site, the liquid trade waste from the garbage bin cleaning area should pass through the grease trap, if it is practical to do so. A dry basket arrestor with a fixed screen is to be fitted to all floor wastes in the washing area that drain to Icon Water's Sewerage Network.

Chemical handling and storage

Safety Data Sheets for any chemicals stored in bulk on site, and which may be present in the wastewater, must be provided to Icon Water as an attachment with the Icon Water liquid trade waste application form.

Chemicals should be stored in an area where any spillage cannot drain to Icon Water's Sewerage Network or stormwater system. Concentrated chemicals e.g. acids, caustic and other corrosive chemicals must not be discharged to Icon Water's Sewerage Network. Chemical solutions containing small quantities of these substances should be neutralised before discharging to Icon Water's Sewerage Network.

Housekeeping practices

Icon Water require the following:

- floors are to be dry-swept before washing to avoid wastes being caught up in the wash water discharged down the drain to Icon Water's Sewerage Network
- pre-wiping of utensils, plates, bowls etc. to the scrap bin before washing up, so as to minimise the amount of waste put down the drain to Icon Water's Sewerage Network
- all food waste/scraps must be placed in appropriate scrap bins and disposed of as solid waste appropriately (not to Icon Water's Sewerage Network).

Compliance management

Record-keeping

Trade Waste Customers must:

- keep documentation relating to inspection and servicing of all pre-treatment systems at the premises for at least two (2) years and make this documentation available to Icon Water upon request
- maintain appropriate records to demonstrate compliance with the Liquid Trade Waste Negotiated Contract at all times.

Site inspection

Icon Water's personnel may attend the premises to conduct site inspections to verify compliance with the Liquid Trade Waste Negotiated Contract. The indicative frequency of site inspections is detailed in Section 9.12 of Icon Water publication *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements*.

Retail food activities that typically fit the *No Cooking* definition and *do not* generate greasy and/or oily waste

The following table lists retail food preparation activities that Icon Water classify, for the purpose of discharging associated wastewater to the Sewerage Network, as not generating greasy/oily discharges. These activities do not require the installation of a grease trap.

Please note: This list may not be exhaustive.

Item	Business/Discharge Type
1	Baker (retail) – only bread baked on-site
2	Boarding house / bed and breakfast / hostel kitchen – up to and including 10 persons
3	Café / coffee shop / bistro – No Cooking
4	Canteen / cafeteria – No Cooking
5	Club – No Cooking
6	Community hall / civic centre – No Cooking
7	Day-care centre – No Cooking
8	Delicatessen – No Cooking
9	Fish shop – fresh fish for retail - No Cooking
10	Fruit and vegetable shop
11	Fruit and vegetable shop – loading dock
12	Hotel – No Cooking
13	Ice-cream parlour – imported and take-away only
14	Juice bar – No Cooking
15	Mixed business – No Cooking
16	Mobile food van – No Cooking
17	Motel – No Cooking
18	Nightclub – No Cooking
19	Nut shop
20	Pie shop – imported and re-heated only
21	Pizza – re-heating of off-site pre-made pizzas only
22	Sandwich shop / salad bar / snack bar – No Cooking
23	School – canteen with No Cooking
24	School – home science with cooking*
25	Takeaway food outlet – No Cooking on-site

* A school with home science facilities, used to conduct cooking classes, only needs to discharge their wastewater through a grease trap if it is both practical and already available because of other activities (e.g. a school canteen with Hot Food / Cooking).

Requirements for retail food preparation activities that *do* generate greasy and/or oily waste

Refer to Icon Water trade waste Guide Note *TW-GN-102* for requirements relating to retail food activities that *do* generate greasy and/or oily waste.

References

- *STD-SPE-P-003 Trade Waste Approval and Compliance Requirements*
- *TW-GN-102 Trade Waste Guide Note - Retail Food Preparation ~ Hot Food ~ Cooking*

Issue	Date	Reason for Revision	By
A	10/06/2025	Issue for public consultation	S. Chappell
B	31/10/2025	Issue for use	S. Chappell