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SUBMISSION TO TAUMATA AROWAI ON NATIONAL WASTEWATER ENVIRONMENTAL PERFORMANCE STANDARDS

Thank you for the opportunity to present this submission on the proposed national wastewater environmental performance standards (the standards) discussion document. The Queenstown Lakes District Council (QLDC) recognises the significant benefit and efficiencies that a standardised approach to these topics will unlock. Robust national wastewater environmental standards will provide local authorities, such as QLDC, certainty on expectations and enable confidence when making critical infrastructure investment decisions.

However, the discussion document raises a number of questions and concerns, and QLDC believes amendments are necessary to address areas of uncertainty and confusion, as well as to ensure environmental and cultural considerations are effectively protected for future generations.

QLDC has reviewed and supports the submission presented by Water NZ. At a high level, Water NZ has addressed the following themes:

- the current arrangements are not working
- there should be no backsliding on current receiving environment protections
- the scope of standards is limited
- clarity is required to ensure consistent, clear resource management policy settings
- Māori perspectives (values and interests) are not reflected in the standards
- additional tasks for the water services authority (Taumata Arowai) must be resourced and funded.

QLDC outlines the following additional submission points:

- discharge to land is preferable where reasonably practicable
- the standards need to be comprehensive from a discharge quality perspective
- standards must be tailored to the receiving environment, monitored effectively and designed to protect it from environmental degradation
- the standards need to be aligned with the Resource Management Act 1991 (RMA)
- greater clarity is required for the management of overflows and bypasses
- a three-year transition cycle is required, in alignment with local government planning cycles.

QLDC acknowledges that this submission has been made on the discussion document and not the standards themselves. Given the significant implications and importance of these standards, QLDC looks forward to reviewing and submitting on the proposed standards once drafting is complete and would welcome the opportunity to share its insights and experiences in further detail as the process develops. Thank you again for the opportunity to provide comment.

Yours sincerely,



Tony Avery

General Manager – Property & Infrastructure

SUBMISSION TO TAUMATA AROWAI ON NATIONAL WASTEWATER ENVIRONMENTAL STANDARDS

1.0 Context of national wastewater environmental standards in relation to QLDC

- 1.1 QLDC manages four wastewater treatment plants, with reticulated wastewater services provided to 21,660 residential properties in the district and approximately 2,895 non-residential properties. An average of 14,500m³ of wastewater is produced in the district daily.
- 1.2 These wastewater services need to be functional and resilient within the Queenstown-Lakes District's (the district's) seismically active and mountainous terrain, whilst protecting the outstanding natural landscapes on which the district's reputation is based.
- 1.3 QLDC's wastewater systems need to meet the needs of the district's resident and visitor population at their peak. The district has an average daily population of 80,910 (visitors and residents) and a peak daily population of 121,365. By 2053, this is forecast to increase to 146,646 and 219,969 respectively¹. It is one of the fastest growing areas in Aotearoa New Zealand, with the resident population having grown by 5.92% per annum over the last ten years. Planning for future growth in the district is addressed through the Grow Well Whaiora urban growth partnership between government, QLDC and Kāi Tahu. The rapid resident population growth and high levels of visitation makes wastewater services planning highly complex.
- 1.4 QLDC has invested significantly in the past decade to improve its wastewater management practices. As a result, all its treatment plants are modern (constructed or substantively upgraded within the last 15 years), operating under recently issued consents and are generally capable of achieving high levels of compliance with their resource consent conditions. In addition, QLDC's 2024-34 Long Term Plan sets out an ambitious programme of investment to maintain and improve levels of service, whilst also providing for the significant forecast population growth. Despite this level of investment QLDC has had periodic and ongoing compliance challenges associated with the performance of its wastewater treatment infrastructure.
- 1.5 A key challenge for the district is the sensitivity of the receiving environments to which our treatment plants must discharge. QLDC recognises it has a particular duty of care bestowed upon it as a result of being top of catchment and the custodian of some of the most precious environments in Aotearoa New Zealand. The nature of the receiving environments and the competing demand for land makes the disposal of treated wastewater a complex problem for our district.
- 1.6 We also recognise the importance of Māori values in regard to the management of wastewater, and their strong preference for disposal of treated wastewater to land. QLDC has invested significantly to achieve this outcome, and in 2019 was successful in converting all discharges to being land based. Unfortunately, the land disposal approach adopted for the Shotover WWTP (the district's largest facility, servicing the greater Queenstown area) has failed, and at the end of March 2025 QLDC made the difficult decision to revert to a direct to river discharge whilst a sustainable long-term solution is explored, consented, designed and built.

2.0 QLDC fully supports the Water NZ Submission

- 2.1 Water NZ supports the concept of environmental performance standards, with the intent of proving certainty and efficiencies with wastewater consenting. It also supports uplift in other aspects of

¹ <https://www.qldc.govt.nz/community/population-and-demand>

wastewater management; a framework for management of overflows and bypasses, and a regulatory incentive for the reuse of biosolids.

2.2 However, Water NZ considers substantial amendments to key aspects of the standards are required to provide an appropriate, holistic and efficient framework for the consenting of wastewater services across New Zealand. These amendments need to address the following high-level themes:

- the current arrangements are not working
- there should be no backsliding on current receiving environment protections
- the scope of standards is limited
- clarity is required to ensure consistent, clear resource management policy settings
- Māori perspectives (values and interests) are not reflected in the standards
- additional tasks for the water services authority (Taumata Arowai) must be resourced and funded.

2.3 QLDC fully supports the Water NZ submission. The consultation document identifies the emphasis from Māori for ‘at-place’ decision making, the preference for treated wastewater to be disposed to land, and their desire to see wastewater treated to the highest standard. It is not currently clear how the proposed standards reconcile against these objectives of Māori.

3.0 Additional points in relation to QLDC

3.1 The following points provide additional context and feedback in relation to the discussion document, and will be addressed in turn:

- discharge to land is preferable where reasonably practicable
- the standards need to be comprehensive from a discharge quality perspective
- standards must be tailored to the receiving environment, monitored effectively and designed to protect it from environmental degradation
- the standards need to be aligned with the RMA
- greater clarity is required for the management of overflows and bypasses
- a three-year transition cycle is required, in alignment with local government planning cycles.

4.0 Discharge to land is preferable where reasonably practicable

4.1 QLDC retains a preference for the discharge of treated wastewater to land where reasonably practicable. However, cost to the community and impact on the environment (including carbon implications) must be taken into account. QLDC supports a pathway for consenting discharges to water where this presents the best overall outcome for the community of balance of all factors.

4.2 QLDC recommends the standards promote and enable discharges to land as the ‘first choice’ approach. Whilst also providing a decision-making framework to support water suppliers to robustly demonstrate when discharging to land is not viable.

5.0 Standards must be tailored to the receiving environment, monitored effectively and designed to protect it from environmental degradation

5.1 QLDC supports the development of performance standards tailored to the specific receiving environment but holds reservations around the apparent reliance of dilution to manage environmental effects in the proposal.

- 5.2 QLDC recommends that the receiving environment categorisation should be more quantitatively defined. As the receiving environment dictates the treatment standards that the discharge is subject to, it is important that these are not subject to interpretation and avoid unintended outcomes.
- 5.3 QLDC reiterates the message included in the Water NZ submission, in that the standards must protect the environment from further degradation, and where appropriate, support improvement. QLDC does not believe the proposed standards achieve this objective with several of the numerical limits representing a backwards step when compared to status quo performance at many plants across Aotearoa New Zealand.
- 5.4 QLDC has reservations around the use of annual medians to assess several of the numerical limits. Consistent with the feedback from Water NZ, QLDC recommends the use of a moving mean in combination with a 95th percentile upper limit and a maximum allowable value. These additions will provide for a greater level of environmental protection against short duration fluctuations, whilst accommodating some variability in plant performance.
- 5.5 QLDC has concerns around the removal of any requirement to monitor effects on the receiving environment. This is currently common practice and is an important ‘acid test’ to provide ourselves, our communities and our regulators with confidence in the performance of the treatment plants and the appropriateness of the treatment standard. Monitoring the environment provides an opportunity to assess and alter approach if unforeseen effects are identified.
- 5.6 The extent of exclusions to the proposed standards creates uncertainty and could see a number of consent applications fall into the conventional effects-based consenting pathway unintentionally. The exclusion of consideration of cumulative environmental effects is of particular concern, and we do not understand how the standards cannot have regard for contaminant loading across the receiving environment or how the Regional Councils could assess this without defaulting to the conventional effects based approach. QLDC supports the recommendation from Water NZ to adopt a load-based approach for discharges to water that reflects the nature of the specific receiving environment at a catchment level.
- 5.7 The content around periphyton and potential exclusions for ‘hard-bottomed’ or ‘rocky’ streams/rivers lacks clarity and creates uncertainty around the consenting pathway for treatment plants discharging into such environments. QLDC recommends this aspect of the proposed standards requires additional detail to clarify the definition of ‘hard-bottomed’ or ‘rocky’ and either confirm that the conventional consenting pathway would prevail in these situations, or if an alternative approach within the standards is intended providing details of this approach.
- 5.8 Whilst QLDC sees value in employing continuous monitoring in aspects of treatment plant performance, it has reservations around a wholesale requirement for all treatment plants servicing a population of >10,000. Several of the parameters are difficult (e.g. E.coli) and/or expensive (e.g. nutrients) to measure continuously. QLDC recommends fortnightly monitoring through 24hr composite samples tested at an accredited laboratory is generally appropriate. However, QLDC would be supportive of requiring continuous monitoring and reporting of key parameters that are routinely measured at larger treatment plants to provide increased confidence around plant performance (e.g. UV dose, dissolved oxygen levels in aerobic sections of reactors etc.).

6.0 The standards need to be comprehensive from a discharge quality perspective

- 6.1 QLDC has concerns around leaving the obligation to consider the effects of emerging contaminants to Regional Authorities. QLDC suggests that a national body, such as Taumata Arowai, is better positioned to consider and set limits for these pollutants than a Regional Council. Excluding these contaminants

from the standard will create an opportunity for inconsistency and risks undermining the intent of the standards.

7.0 The standards need to be aligned with the RMA

- 7.1 QLDC supports the proposal to grant a consent term of 35 years when a resource consent is sought consistent with the requirements of the standards.
- 7.2 QLDC recommends that the proposal needs to make clear the status of discharges that comply with the Standards. QLDC envisages that consents that comply with the standards would be a controlled activity, with control being limited to managing effects not addressed by the standards.
- 7.3 QLDC also recommends that the standards enable the conventional effects-based consenting regime to remain as a potential alternative pathway for consenting discharges, and that failure to comply with the standards should not in itself be a reason to decline consent.

8.0 Greater clarity is required for the management of overflows and bypasses

- 8.1 QLDC supports the proposed risk-based approach to ensure consistency in the management of network overflows and bypasses. Whilst QLDC's aspiration is to have no overflows from the network, overflow management is part of operating a public wastewater system.
- 8.2 The QLDC network has no engineered overflow points and a history of very few capacity related wet weather overflows. The majority of overflows that occur on the QLDC network result from failure events such as root intrusion, fat build up or other blockages (most commonly construction related), or pipe condition.
- 8.3 As per the commentary provided by Water NZ, the proposed standards do not appear to recognise the material differences between wet weather overflows (network capacity exceeded due to ingress and infiltration of stormwater) vs. dry weather overflows (typically as a result of system failure). The two types of overflow events require different management approaches and the standards need to be clear when requirements relate to one type or the other, or both.
- 8.4 The proposed standards set an expectation that all uncontrolled overflow points would need to be mapped as part Wastewater Network Risk Management Plan development. QLDC's experience has been that dry weather overflows can occur from any number of points on the network depending on the location of the issue, and as such it isn't reasonably practicable to map **all** potential uncontrolled overflow locations. As such, QLDC recommends the standard should be clear in that the requirement is to map potential capacity related 'wet weather' overflow locations and under what rain event this should be assessed for.
- 8.5 QLDC supports the requirement for a consistent reporting framework but recommends that overflows occurring on gravity pipes 150mm in diameter or less and which are fully contained to land should be exempt from a requirement for detailed reporting.
- 8.6 QLDC recommends that the 'first response' reporting is specific in that reporting timeframes are from time of notification, not resolution of overflow but recognise that information at this time may be incomplete.
- 8.7 QLDC recommends that the standards define the risk level of overflows to ensure national consistency in reporting.

9.0 A three-year transition cycle is required, in alignment with local government planning cycles

9.1 As stated, QLDC recognises the need for change and the benefits that can be unlocked through adopting a set of national standards for wastewater management. However, these changes will require investment and time to implement effectively into 'business as usual' arrangements. As such, QLDC strongly recommend that transitional periods are aligned with the local government Long Term Planning process timelines (with a full three year cycle for transition), to enable funding to be secured whilst also providing time for infrastructure modifications, plan development and any staffing or contract changes.

Recommendations

R.1 QLDC supports the submission presented by Water NZ.

R.2. Discharge to land is preferable where reasonably practicable.

R.3 The standards need to be comprehensive from a discharge quality perspective.

R.4 The standards must be tailored to the receiving environment, monitored effectively and designed to protect it from environmental degradation

R.5 The standards need to be aligned with the Resource Management Act 1991 (RMA)

R.6 Greater clarity is required for the management of overflows and bypasses.

R.7 A three-year transition cycle is required, in alignment with local government planning cycles.