



22 April 2025

File: 3-LG-Submissions

Water Services Authority – Taumata Arowai

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## **Submission on Proposed National Wastewater Environmental Performance Standards**

**This submission is drafted for and on behalf of Rangitikei District Council (RDC).**

We acknowledge and thank The Authority for the opportunity to comment on the draft standard. RDC has a significant amount of capital investment planned through its 2024-34 Long Term Plan (LTP) and Infrastructure Strategy for wastewater infrastructure upgrades and associated consenting of discharges. The capital budgets in the LTP are predicated on the expected consent requirements (conditions) based on the current Resource Management Act (RMA) consenting regime. A change or reduction in discharge standards through mandating of these standards is likely to offer a commensurate reduction in capital cost for RDC and its ratepayers.

Noting that the NZ Government has signalled its intended changes to the RMA, this could further reduce input costs in the future.

For RDC, the impacts of the changes are summarised thus;

- Consenting Wastewater Treatment Plants (WWTP) will be simpler and cheaper;
- Most WWTPs will fall under the “small plants” category;
- Marton-Bulls wastewater project is affected; current planning is cognisant of the changes;
- The required network overflow management monitoring and reporting will be a ‘step-up’ however RDC has systems and means to enable the reporting (first due September 2025)

We note that while these standards will make Council’s position easier in terms of process and capital costs, it does so with increased risk or impact to the environment. RDC developed plans to dispose treated wastewater to land based on the current RMA provisions and applicable regulations. The view of our community, and in particular Iwi, is that it was the right thing to do.

RDC has not had time to subsequently discuss the changing standards with our community. We also believe that while some water bodies can accommodate these standards others may not. The other issue is that our rivers may be able to cope well with some treated waste in time of high flow, but the effects in low-flow summer or drought conditions will be more pronounced.

Further, we acknowledge the good work on behalf of the Awa in our District of our river catchment collectives, and the work that the rural farmers have put into fencing and monitoring to improve our waterways, noting we also have not yet discussed the standards with these parties.

**In respect of the proposed discharge standards, RDC submits as follows:**

- Support the introduction of mandated national discharge standards (the Standards) in the manner prescribed (i.e. categorised based on risk, receiving environments and scale).
- Supports the engineering of emergency overflow points within wastewater networks under controlled activity status, applied nationally for consistency.
- Support improved monitoring and standardised reporting requirements on the performance of wastewater discharges. Guidance and training on new reporting requirements should be provided by The Authority ahead of their introduction, and post-introduction as necessary.
- Support that where Treaty Settlement legal provisions exist (e.g. as part of post settlement governance entities [PSGEs] relating to specific water bodies) that these Treaty Settlement requirements prevail
- Supports further engagement by The Authority with Iwi to inform further development of the Standards
- Supports the draft legislation in the Water Services Bill (the Bill) that allows for where the infrastructure proposed in a new consent meets the relevant wastewater standard, a 35-year consent must be issued, to maximise the benefit of public investment in the wastewater treatment infrastructure.
- Supports the intent that for wastewater treatment plants with resource consents that will expire in the first two years following the implementation of wastewater standards, the Bill proposes an automatic extension of these consents, so they expire two years following the commencement of the Bill, but **suggests that this expiration extension be increased to three (3) years to better align to planning and budgetary cycles.**
- Supports the introduction of a “small plant standard” as proposed.
- Supports the planned introduction (in future) of Wastewater Environmental Performance Targets applied at a local level
- Supports the proposed grading framework for beneficial reuse of biosolids, and proposed activity status in respect of the applicable biosolids grading. Permitted Activity status should apply to biosolids applied to land and meeting the A grade standard
- Supports the initiative for a single engineering design standard applied (voluntarily) nationwide for water and wastewater infrastructure, especially so for an initial focus on providing infrastructure design solutions for treatment plants in small communities.
- Support the risk-based assessment as outlined for discharges to land
- Endorse the Site-Specific Assessment requirements as proposed (per Appendix 4 of the Standards) for discharges to land

Submitted for, and on behalf of Rangitikei District Council:

Ngā mihi

A handwritten signature in blue ink, appearing to read 'Andy Watson', is positioned above the printed name.

**Andy Watson**  
**Mayor of the Rangitikei District**