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To: The Water Services Authority – Taumata Arowai
kōrero@taumataarowai.govt.nz

From: Porirua Harbour Trust and the Guardians of Pāuatahanui Inlet
Address for service: PHACCTsec@gma0069l.com
Michael Player @ Lindsay Gow
Mobile: 027 224 8181

Submission on proposed wastewater environmental performance standards

The purpose of the Te Awarua-o-Porirua Harbour and Catchments Community Trust (Porirua Harbour Trust) (PHACCT)

The Porirua Harbour Trust (PHACCT) exists to promote the sustainable management of the Porirua Harbour and its catchments by advocating for the sustainable management of the harbour's ecosystem and its catchments and fostering understanding of ecological and environmental issues associated with the harbour and its catchments through education and community awareness

The purpose of Guardians of Pāuatahanui Inlet (GOPI) is:

Consistent with its ecological values, encouraging, protecting, fostering the natural, historic and cultural values of the Pāuatahanui Inlet.

PHACCT and GOPI are also members of Te Hononga, the Wellington Water Catchments Collective, with whom we are aligned in terms of aims, objectives and approach

Our Submission on proposed wastewater environmental performance standards

- The purpose of these proposals is to streamline and reduce costs of RMA consenting of most substantive water infrastructure by provision of common standards, which also seek to protect public and environmental health. While we agree that reducing costs is desirable, this must not be at the expense of public and environmental health.

The common standards need to be minimum acceptable bottom lines no lower than those already in place: For example, minimum concentrations of contaminants to support an acceptable quality and quantity of aquatic life in the particular water body as determined at the local level by the regional council under the RMA and any successor legislation.

- The document specifically seeks to strike a ‘balance’ between wastewater treatment quality and community cost. We submit that such balances can advantage some parts of the community over others and that the consequence can be that environmental quality and related ecosystem resilience and integrity can be undesirably and irreversibly diminished. We seek that waste-water quality standards have strict bottom lines no lower than those existing in and set by the region (through the RMA and any successor legislation) and those which are set through the National Policy Statement on Freshwater Management.
- Specific reference is made to some, but not all Treaty settlement obligations. We consider that all settlements should be upheld through these proposals and that this be made explicit in the document.
- We disagree with the proposed standards defining national predetermined maximum required water quality standards at the point of discharge for key contaminants. It would be highly counter-productive if waste-water management authorities acted to degrade local receiving waters because the national standards permitted it i.e. if a current set up was delivering a high standard of water quality the managing authority could degrade the receiving water quality yet still be within the allowable national standard.
- We seek that regional councils be able to modify standards upwards to meet the potentially widely varying water quality requirements of the receiving environment and to meet community objectives for those particular water bodies. The cumulative limits required to be set by regional councils through regional water plans by the Government’s National Policy Statement on Freshwater Management under the RMA need to be followed and enforced. The proposals as they stand could well lock in current levels of contamination and reduce the likelihood that contamination from wastewater discharges will not reduce over time.
- We reiterate: The proposed changes may consider the quantity of receiving waters, but not their quality or desired values or outcomes, or address cumulative effects of multiple discharges. We request that quality or desired values or outcomes, and the cumulative effects of multiple discharges, be mandatory considerations to ensure improvements in water quality from other point or diffuse sources of contamination.
- In the proposals, most consents from water treatment plants would be granted for 35-year terms, without the opportunity to review consent conditions or determine the effects of those discharges to land or water. We find this unacceptable and request not only shorter terms for any consents which implement changes over time, but also regular reviews of conditions to ensure that consents deliver improvements in the receiving environment over time as may be required to meet environmental bottom lines in regional plans. This is particularly the case where those plans require improvement in the water quality over time. Wastewater discharges should also contribute towards environmental improvement over time, along with other discharges into the environment.

In our own situation, we point out that the decision of the consenting authority in 2023 was to grant a consent with an 18-year term. In doing this it noted that such a term best met the views of the community and the mana whenua. The consent also spelt out considerable powers of the regional council to review and amend operating conditions during that 18-year period.

- In the proposals, overflows from infrastructure would become approved, even if these exceeded receiving environment standards. While we understand that in major storm conditions such overflows are more likely, we would want time and/or volumetric limits put on any such discharges. When there are failures due to emergency situations, such matters can be accommodated and are provided for under the RMA, under certain limited circumstances.

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