

Eketahuna WWTP Resource Consent Application  
*Oral Submission of*  
Water & Environmental Care Assoc. Inc. (WECA)  
6<sup>th</sup> April 2017

1. In our original submission on this application, we opposed the request for the term sought on the following grounds:
2. That there is insufficient data to justify the term requested.
3. That there is insufficient information on investigation of alternate disposal methods (e.g. Land based disposal by irrigation or similar) especially during low flow conditions.
4. That the application as submitted is significantly out of date.
5. That the application as submitted does not meet the requirements of the One Plan.
6. The configuration offered differs from documented options.
7. That the difference between the 'Peak Wet Weather Flow' applied for, and 'Average Dry Weather Flow' quoted in the documentation is unacceptably high and does not reflect claimed repair work to the network.
8. That paragraphs in this application refer to documentation of other plants to offer as comparisons, but no actual data is offered.
9. We requested the following relief:
10. That the term is reduced to seven (7) years, being the time required to complete the planned upgrade (2 years) and a comprehensive monitoring programme (5 years) be initiated so that a clear set of performance data is produced, including influent and effluent flow metering. This will provide the basis for a longer term consent when the plant is fully upgraded and meeting the requirements of the One Plan and the obligations of the Manawatu River Accord.
11. In the almost a year since our submission on the application, very little has changed in way of reliable data, or of any significant improvement in the proposal.

12. In fact, promised results from the Pahiatua upgrade have not been forthcoming, and further doubt has been cast on the capacity of the Makakahi River to assimilate pollutants, and therefore for the proposed discharge to the Makakahi to be acceptable within the targets set within the Operative One Plan and of the commitments made by Tararua District Council as signatories to the Manawatu River Leader's Accord.
13. Tararua District Council has a long history of poor compliance, and of extreme delays in meeting its resource consent obligations – this plant's previous consent expired in 2005.
14. Given the lack of improvement in the proposal – especially in that:
  - No meaningful work has been done to identify and secure alternatives to 100% discharge to the river.
  - No progress has been made to move the discharge point.
  - No work appears to have been done in terms of identifying and rectifying upstream sources of pollution – which is already oversubscribed.
  - No additional monitoring has been identified.
15. And given that WECA and other s274 parties offered a number of suggestions as to how this situation could be resolved, but all such suggestions were opposed by TDC, we now request that this application be granted a maximum three (3) year term in which to:
16. Move the current discharge point and the related monitoring sites to remove the confounding effect of the Ngatahaka Stream
17. Use an appropriate technology (tracers) to assess the efficacy of the mixing zone
18. Collect and produce an adequate data set that establishes a valid baseline and subsequent discharge characteristics.
19. Correctly and accurately characterise the influent and effluent flows from this plant
20. Develop a treatment regime that has a genuine 'no more than minor' effect on the river – and therefore reduce the cumulative load on the Manawatu River
21. Genuinely seek alternatives to reduce a 100% reliance on discharge to river.

22. Genuinely seek to reduce the volume of wastewater generated – both by water use reduction policies, and by significantly reducing I & I.

23. We support and echo the views of other s274 parties – especially the statement made by WPS, that:

*“We continue to be of the view that if the assimilative capacity of the river is already exceeded then either the WWTP must divert its effluent from the river, or TDC must arrange for other sources of contaminants to be decreased. That the catchment is already polluted should be a reason for extra effort rather than for adding to the problem”.*

24. Thank you.

25. ENDS