

**BEFORE THE HEARING PANEL**

**IN THE MATTER**

the Resource  
Management Act 1991  
(the Act)

**AND**

**IN THE MATTER** of applications by Tararua District Council to Horizons Regional Council for application **APP-2005011178.01** for resource consents associated with the operation of the Eketahuna Wastewater Treatment Plant, including a discharge into the Makakahi River, a discharge to air (principally odour), and a discharge to land via pond seepage, Bridge Street, Eketahuna.

**Submission by Wellington Fish and Game Council**

**Phil Teal**

**Regional Manager**

**6 April 2017**

My name is Phillip (Phil) Teal. I am the Regional Manager of Wellington Fish and Game Council, a position I have held for over nine years, and prior to that over seventeen years with Auckland/Waikato Fish and Game Council. I have relevant qualifications in ecological assessment and technical issues (Masters of Science (Hons) in Biological Sciences). I have experience in Resource Management Act processes and hearings since its inception.

Wellington Fish and Game Council is a statutory body established under the Conservation Act 1987. Under Section 26 of the Conservation Act 1987, Fish and Game Councils have a statutory obligations to: maintain, manage, and enhance the fish and game resource in the recreational interests of anglers and hunters; assess and monitor the condition and trend of ecosystems as habitats for sports fish; advocate the interests of the Council, including its interests in habitats; and represent the interests and aspirations of anglers and hunters in the statutory planning process.

Part 2 considerations of the Resource Management Act 1991 relevant to Fish and Game Council's submission are: section 6 (a) that obligates the committee to recognise and provide for as a matter of national importance the preservation of the natural character of rivers and their margins; and section 7 (h) that details matters for regard specifically relating to the protection of the habitat of trout. This includes ensuring that the physical, chemical, and ecological aspects of that habitat are such that the trout fishery can be sustained, and the life supporting capacity of the resource is protected.

The discharge of nutrients would continue to adversely impact on the life supporting capacity of the resource (relative to baseline levels), its natural character, its recreational values, and its sustainable management. As such, the current application contravenes the purpose and principles of the Resource Management Act 1991. Also under the Local Government Act 2002 the Tararua District Council needs to take account, not only the social and economic wellbeing of the community, but also its environmental wellbeing – the latter is not being appropriately addressed.

This submission will focus on advocacy for improved water quality and habitat values for trout habitat and ecosystem health.

The Makakahi River has significant values as a fish and game resource; namely:

- Identified as trout spawning habitat;
- Identified as a fishery of regional importance (One Plan – Schedule D).

This also applies for the downstream sites on the Manawatu River.

Wellington Fish and Game Council therefore considers that the following principles should be considered and supported:

1. Reducing nutrient inputs (namely nitrogen and phosphorus) into the receiving environment – the Makakahi River and downstream Manawatu River – to achieve the One Plan target for MCI (Macroinvertebrate Index) of 120;
2. To maintain ecosystem health whereby a healthy ecosystem is where the life supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of freshwater;
3. This supports a healthy trout fishery through trout food and trout habitat;
4. Point source discharges from wastewater treatment plants be discharged to land (if practical and possible);
5. This is also consistent with principles promoted by iwi to advance land disposal as a discharge option (but I defer to iwi and expert witness submissions such as Mr Percy on this aspect);
6. A proactive approach to improving water discharge quality to create a trajectory of improving water quality of the Manawatu River and its tributaries to achieve ecosystem health;
7. Improved consideration of the cumulative effects of additions of nutrient inputs – need to get beyond the discussion of individual effects being “no more than minor” even though additional inputs can be interpreted as relatively small when considered in isolation;
8. If discharge to land options are not able to be undertaken immediately, then a commitment to a staged approach to remove as a direct point source must be made – noting that there has already been sufficient time to consider options and introduce as a consent application;
9. Consideration of innovative options involving treatment of smaller wastewater treatment sites to be treated at a single site – as per concepts for Feilding and Manawatu District Council area – rather than small incremental improvements that essentially maintain the status quo.



### **Relief Sought:**

Wellington Fish and Game Council considers that following should be considered for conditions of any consents for the discharge of treated waste water from the Eketahuna Wastewater Treatment Plant:

1. That the treated wastewater be discharged to land to:
  - Further reduce nitrogen and phosphorus input into the receiving waters;
  - Reduce periphyton growth in the river resulting in less dissolved oxygen fluctuation and improved habitat for invertebrates and fish (trout habitat and trout spawning habitat),
  - Reduce periphyton growth in the river resulting in amenity values being maintained – i.e. the riverbed is not covered in algae,
  - That contact recreation for recreation including angler contact is safe and does not result in health issues.
2. The length of consent (if granted) should be short term with a commitment to actually discharge wastewater to land: given the current situation a suggestion of:
  - Two years to consider options and confirm a development action plan;
  - After five years from the granting of the consent that the construction of infrastructure for land disposal will be completed and operational.

It is requested that we avoid the pattern of undertaking yet another set of investigations, then reapplying for consent, resulting in consideration of land disposal extending over long periods of time – often stretching out for years.

3. Address levels of nutrients discharged into the river that may result in excessive periphyton and algal growths – to achieve an MCI target of 120 then Chlorophyll a should be kept below 50mg/m<sup>2</sup> (see paragraph 8 (c) of Adam Canning's evidence) and to achieve that, in-stream concentrations so that SIN is no higher than 0.1mg/L and DRP is no higher than 0.008mg/L (see paragraph 8 (f) of Adam Canning's evidence).
4. Require adequate monitoring to enable levels of periphyton and algal growth to be assessed in a timely manner – establish a formal monitoring plan.
5. Require adequate monitoring of potential indicator species for abundance and diversity including macroinvertebrates and potentially trout – establish a formal monitoring plan.
6. Require action(s) in an adaptive management plan in response to trigger points to high levels of nutrient concentrations at discharge point and downstream, and periphyton levels downstream – establish a management plan responsive to changes in river biota.

7. Require a regular report (three or six monthly) on the discharge wastewater quality and indication of occurrences of non-compliance frequency within limits.
8. Require investigation of methods of treatment and discharge options (including discharge to land) to ensure continuous improvement and re-evaluation.
9. Require conditions imposed that are consistent with the principles of the National Policy Statement Freshwater and One Plan Regional Plan.

Additional Comments:

It is noted that in dealings with consultation process regarding this consent application and at the pre-hearing meetings between the submitters and the applicant, I developed the following impressions:

1. There appeared to be a reluctance by the applicant to engage with interested parties in setting up a working party to consider all wastewater treatment options in the Tararua District (i.e. this site, and other three other sites).
2. There was an approach by the applicant to continue the existing approach with minimal improvements and little commitment to discharge to land.
3. There was a sense of tokenism in the pre-hearing as being simply part of the process to be undertaken and continue with status quo operations.
4. The application follows a long period of minor actions and temporary consents obtained.
5. The applicant cannot provide confidence that surface water quality outcomes, plant operation, groundwater quality or cultural values can be addressed in the context of the One Plan, NPS FM, or Part 2 of the Resource Management Act 1991.
6. It would be preferable for the District Council to take a proactive approach to improving water discharge quality to create a trajectory of improving water quality of the Manawatu River and its tributaries to achieve ecosystem health.

[End]