

**Eketahuna Waste Water Treatment Plant Consents
Oral Submission of Water Protection Society
(6th April 2017)**

- 1) At the time of making our written submission on 7th May 2016, the Water Protection Society Incorporated stated that it was not able to express support for, or opposition to, the application because the application was so lacking in even basic information. It is incredible that an application could be accepted by MWRC, never mind submitted by TDC, without provision of such basic data as influent and effluent volumes! We said that upon provision of such information we may be able to take a more definite position.
- 2) Unfortunately, such information has mostly not been provided during the past 11 months and in some respects the application has become more uncertain rather than less as the Pahiatua WWTP, the model for the upgrade of the Eketahuna WWTP, appears not to be working as predicted.
- 3) WPS does not wish to see TDC dragging its feet on doing anything effective, the previous long term consent having expired in 2005.
- 4) Having read the s42A, S41B and submitter expert reports, WPS now opposes the application because of the adverse effects the discharge is having on the Makakahi River and the inadequacy of the proposal to rectify this.
- 5) We request that, given the essential nature of the infrastructure, that TDC be granted a 3-year consent in which to:
 - a) alter the discharge point, and the upstream and downstream monitoring sites so that they will unequivocally reveal any effect the

discharge is having (i.e will remove any confounding effect of the Ngatahaka Stream)

- b) use a tracer to assess the thoroughness of mixing
 - c) collect data at an increased frequency to enable an adequate baseline to be established for the new monitoring points and to characterise the influent and effluent
 - d) work with local hapu to identify methods of treatment and discharge that would meet their spiritual needs
 - e) develop a high quality proposal that will result in the discharge, if any, having an effect that truly is no more than minor upon the river
 - f) thoroughly investigate alternatives to discharge to water including considering discharge to land and decreasing the generation of wastewater, rather than just alternative end-of-pipe options.
- 6) Given TDC's record in not meeting deadlines, any consent should have clear dates by which different actions, investigations and proposals are to be carried out or prepared and reported on.
- 7) These should then lead into a new consent application being lodged that is adequate in data and detail.
- 8) 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.

Thankyou.

