

15 December 2023

Wellington Regional Council

By email: [regionalplan@gw.govt.nz](mailto:regionalplan@gw.govt.nz)

## Plan Change 1 to the Natural Resources Plan Consultation

Tēnā koutou katoa

1. Water New Zealand (Water NZ) welcomes the opportunity to provide comment on Wellington Regional Council's (GWRC) proposed Plan Change 1 to the Natural Resources Plan for the Wellington Region (PPC1).
2. Water NZ is a national not-for-profit organisation which promotes the sustainable management and development of New Zealand's three waters (drinking water, wastewater and stormwater). Water NZ is the country's largest water industry body, providing leadership and support in the water sector through advocacy, collaboration and professional development. Its ~3,100 members are drawn from all areas of the water management industry including regional councils and territorial authorities, consultants, suppliers, government agencies, academia and scientists.
3. Given our members' interests, our submission focuses on the objectives, policies, rules and other methods to manage activities with implications for water.
4. We recognise that, under section 86B(3) of the Resource Management Act 1991, all rules in PPC1 have immediate legal effect from 30 October 2023.
5. This submission was drafted before the Government announced their intentions to repeal the Natural and Built Environment Act 2023 and the Spatial Planning Act 2023, replace the National Policy Statement for Freshwater 2020 and their new direction for water services. Water NZ is committed to the sustainable management of water to the benefit of the environment and our communities, as such would support GWRC's continued, proactive focus on strong environmental health policy and regulatory direction.

### Approach to our submission

6. Water NZ broadly supports PPC1 and its focus on water quality and ecological health objectives to implement the National Policy Statement for Freshwater Management 2020 (NPS-FM). It is a comprehensive plan which gives similar weight to ecological integrity as it does human activities and landuses.

7. This submission addresses specific clauses as they appear in the consultation document and then provides general commentary to help guide the final drafting.
8. We do not provide commentary on the Whaitua Te Whanganui-a-Tara and Te Awarua-o-Porirua Whaitua freshwater unit objectives. In recognition that these values and objectives have been created over many years with mana whenua and community, and other stakeholders.

### Prioritising Te Hurihanga Wai in freshwater management and decision making

9. The NPS-FM requires regional plans and policy statements to embed Te Mana o te Wai into decision making. Requiring local kaupapa Māori in decision-making structures will ensure that Te Mana o te Wai, the spiritual wellbeing and whakapapa of Te Hurihanga Wai (the water cycle) is prioritised, respected, protected and enhanced - the very objective of the NPS-FM and the focus of the PPC1.
10. We **recommend** that;
  - o the Te Mana o te Wai hierarchy of obligations are made clearer in the definitions and objectives, including prioritising mana whenua, their whakapapa and tikanga, in freshwater management and decision making.
  - o PPC1 instils an integrated catchment approach that recognises the interconnected nature of a catchment, the receiving environments and Te Hurihanga Wai. An approach that includes wastewater, stormwater and drinking water supply, rather than individual plans or strategies for each network.
  - o PPC1 states clearly that Te Mana o te Wai guides all policy, plans and consents that impact on three waters, from the earliest stage of consideration and before options are presented to regional council, planning committee or consulted on with communities.

### Definitions, objectives, policies and rules with implications for water are generally supported

#### **Interpretation**

11. The extensive definitions are acknowledged. We are especially pleased to see the inclusion of terms such as containment standard, core allocation, hydrological control, impervious surfaces, stormwater catchment, stormwater treatment system, wastewater network catchment and wet weather overflows.
12. The description for containment standard of wet weather overflows; 'a targeted frequency to be achieved over time'. Achieved may not be the right word, we **suggest** to "be less than", rather than achieved. Enforcing the wastewater wet weather containment provisions in PPC1, progressively reducing the frequency and/or volume of wet weather overflows (to less than 2 per

year in each Whaitua), is a priority in terms of the intent of the NPS-FM and meet the community values and objectives of PPC1.

13. The term [community] drinking water is used extensively through PPC1, however the definitions do not include drinking water, or drinking water source. We **suggest** they are included for completeness.

### **Objectives**

14. To what is quite a thorough plan in terms of policy and rules for natural resources, ecosystems and human activities, Water NZ **support** the changes to objectives 18, 19 and 25 to expressly list the type of water body (rivers, lakes, natural wetlands and coastal water) and the activities these are suitable for (contact recreation, Māori customary use, mahinga kai, biodiversity, and aquatic ecosystem health).
15. We are pleased to see the amendments to Chapter 3 (Objectives) includes tables listing quantifiable measures for contact recreation, Māori customary use, aquatic ecosystem health and mahinga kai objectives. Including numerical values for macrophytes, periphyton, biomass, invertebrate, fish and mahinga kai species in rivers, streams and lakes is a smart way of demonstrating achievement of the first priority of Te Mana o te Wai. What gets measured, gets managed.

### **Policy**

16. It is **suggested** Policy 4.9.1 Discharges to land and water include a bullet requiring reticulated networks to be compliant with the DIA's National Transition Unit's National Engineering Design Standard<sup>1</sup>.
17. We **query** whether Policy 5.4.4 Uses of beds of lakes and rivers general conditions should be re-written to allow ponding above an intake and encourage a making room for rivers approach. Noting such an approach is only encouraged where appropriate and doesn't increase flood inundation risk to people, property or infrastructure. Aotearoa's waterbodies have enormous flood capacity, but piping of streams and encroachment of flood plains and riparian margins reduces that capacity. Making room for water allows land to flood safely, while providing a range of benefits such as aquatic and riparian habitat, wetland restoration, carbon sequestration and increased groundwater recharge. It also offers to restore mana whenua connections with their local water. Where streams, wetland and floodplain remain in natural state, they should be prioritised for protection and providing natural hazard mitigation.

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<sup>1</sup> <https://www.waterservicesreform.govt.nz/the-case-for-change/national-engineering-design-standards/>

18. In terms of giving effect to Te Mana o te Wai, we **support** Policy 6.16\* Supporting improved water quality outcomes. (\*Highlighting an error in the numbering, we believe this clause should be 6.18).

### **Method**

19. PCC1 rules and policy must be aligned with national direction and standards. Clause (c) in Method M43 outlines a compliance approach to ensure effective regulation of urban land uses and discharges, including permitted activity enforcement, consent reviews and the review of charging policies. There is work going on across legislative programmes, regulatory frameworks and infrastructure planning which will influence GWRC plans, compliance and enforcement, for example, Taumata Arowai's wastewater standards. To ensure consistency, efficiency and ultimately good environmental outcomes while ensuring communities have safe services we **recommend** that GWRC engage with, but not limited to the water regulators - Taumata Arowai and Commerce Commission- and Te Waihanga Infrastructure Commission).
20. We **support** the partnership with Wellington Water Limited approach in Method M43: Supporting the health of urban waterbodies. Below, we provide further commentary on the following clauses;
- (i) 2. good practice around new aspects of stormwater management e.g. 'deemed to comply' proprietary stormwater filtration devices
  - (ii) incentivising and supporting the retrofitting of rainwater tanks at property or catchment scale.
21. New developments are increasingly being required to include stormwater capture and retention. However, these systems can become a public health risk if not managed properly. Lack of regulatory oversight, poor design, construction and maintenance, weak compliance frameworks, and substandard technologies means systems go unchecked, and that there is no incentive for owners to maintain their systems or demonstrate compliance. Poorly designed systems can cause ponding and flooding. Some councils have developed performance criteria and identified acceptable solutions, such as Wellington Water's Water Sensitive Design for Stormwater: Treatment Device Guideline (2019) and Auckland Council's guideline document Stormwater Management Devices in the Auckland region, GD2017/001.
22. We **request** GWRC through Te Ura Kahika, with Taumata Arowai, the Ministry for Building, Innovation and Employment and Ministry for the Environment develop;
- draft standard consent conditions or verification methods for on-site stormwater device design, construction, maintenance and on going compliance
  - A good practice stormwater storage volume or device sizing calculation tool
- A standardised approach would lead to certainty for designers, planners and inspectors and significant cost and resource savings all round.

23. We draw GWRC's [and Wellington Water Limited's] attention to the communication and community education resources<sup>2</sup>, training and digital badges including for stormwater Water NZ offer<sup>3</sup>. We **welcome** the opportunity to work with you, and Wellington Water, in the upskilling of the region's community and 'high risk industrial or trade premise' workers.
24. Water NZ wholeheartedly support the addition of Method M45: Funding of wastewater and stormwater network upgrades. It is appreciated that a new, financially sustainable, funding model for water services delivery is needed. Arrangements which avoid an investment hiatus, and enable a well-defined, committed, and funded pipeline of work will help the delivery of safe and environmentally appropriate water services. Water NZ **recommend** adding the economic and Taumata Arowai and the Commerce Commission into this method.

#### Chapters 8 and 9 Whaitua Te Whanganui-a-Tara and Awarua-o-Porirua Whaitua

25. Water NZ **acknowledge** the significant work with mana whenua and community, over the past number of years, has produced comprehensive and clear values and objectives. The objective for both harbours, that they are progressively improved and are wai ora by 2100, and the aspirational objectives that noticeable change towards wai ora is achieved by 2040.
26. Water NZ are **generally supportive** on the whaitua chapter's policies on stormwater, especially - Policy P2 Management of activities to achieve target attribute states and coastal water objectives, Policy P9: General stormwater policy, Policy P10: Managing adverse effects of stormwater discharges, and the clauses to achieve them, such as water sensitive urban design, imposing quality and quantity hydrological controls, reduction in contaminant load, and requiring financial contributions as to offset adverse effects from residual stormwater contaminants.
27. We **commend** GWRC for the proactive approach on addressing zinc and copper from human activities for ecological health for the region. Zinc and copper have adverse effects on aquatic receiving environments. They are transported into waterways by stormwater from roads (zinc from tyre wear, copper from brake pad wear), and roofs (zinc from galvanised roofing), and other impervious surfaces including paved areas around industrial sites. Piped stormwater networks convey runoff and efficiently move contaminants generated by human activities to the nearest water body. The 'first flush' of stormwater during a rain event can include high levels of contaminants.

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<sup>2</sup> [https://www.waternz.org.nz/DataFilter?Action=View&DataFilter\\_id=171](https://www.waternz.org.nz/DataFilter?Action=View&DataFilter_id=171)

<sup>3</sup> <https://www.waternz.org.nz/training>



28. District and regional plans across New Zealand are now requiring buildings avoid the use of ‘inert materials’ specifically unpainted roofing or spouting materials containing zinc or copper, to minimise containment runoff.
29. Water NZ have recommended to MBIE that the building consent system should put in place methods to manage water quality (in doing so, giving effect to Te Mana o te Wai<sup>4</sup>), including controls on cladding and/or roofing materials (including guttering and spouting). Such conditions could include;
- Building materials are sealed or otherwise finished to prevent water runoff which contains copper or zinc.
  - Buildings shall avoid the use of unpainted roofing or spouting materials containing zinc or copper to minimise contaminant runoff.
  - Any development will need to treat these surfaces or the stormwater from these surfaces to avoid copper or zinc from entering stormwater.
  - Stormwater from copper or zinc surfaces is to be collected and treated.
30. We **recommend** GWRC include similar provisions for zinc and copper in the changes to the Natural Resources Plan.

## Wastewater

31. We support the wastewater rules in PCC1. However, we are concerned with the lack of provisions for biosolids and minimal recognition of onsite wastewater systems. Water NZ have been working in partnership with WasteMINZ, the Centre for Integrated Biowaste Research (CIBR) and the New Zealand Land Treatment Collective (NZLTC) in partnership with the Environment (MfE), Health (MoH) and Primary Industries (MPI) ministries to update the Safe Application of Biosolids to Land in New Zealand, 2003. A draft revision was published in 2017, the Guidelines for Beneficial Use of Organic Materials on Productive Land and we are aiming to have the finalised version published in early 2024. As a minimum, we **recommend** PPC1 reference and make use of the forthcoming Guidelines for Beneficial Use of Organic Materials on Productive Land, 2024.
32. To policies PP8 Avoiding discharges of specific products and waste, we **recommend** adding a provision “Wherever possible, a swimming or spa pool, should drain to the public wastewater system”. The sewer conveys wastewater to a treatment plant which is designed to remove many pollutants from water. Whilst we support controlled discharges to land, swimming and spa pool water can contain chemicals such as chlorine and copper to kill bacteria and/or algae. If

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<sup>4</sup> Te Mana o te Wai—means the first priority must be to ensure the life-supporting capacity of water in all its physical forms whether flowing or not and whether over or under the ground; and fresh water, coastal water, and geothermal water. All parties with powers, functions and duties under the Water Services Act 2021 are required to give effect to Te Mana o te Wai, this includes clauses of the Building Act (2004).

discharged into stormwater systems or freshwater, this treated water has the potential to harm, even kill, fish and other aquatic life.

33. We welcome that the lifecycle management and funding requirements of water infrastructure to maintain operability is taken into account in P10 (iv). The **concern** to Water NZ is how will GWRC monitor and ensure compliance with this clause? Will they require regular and ongoing inspection reports and funding plans demonstrating compliance?
34. Policies P13 both relate to reducing copper and zinc loads from stormwater discharges from local authority and state highway networks. As discussed above, copper and zinc are introduced from building materials as well as the use of roads. Roads are only small part of a catchment when it comes to contributing contaminants, yet roads do act as effective conveyance systems for the cocktail of contaminants from all surrounding land uses. It will be extremely difficult to separate out different contributing land uses introducing contaminant load into a stormwater system. Considering transport networks as a discrete system will be challenging in terms of design standards, operations and managing and consenting.
35. The Natural Resources Plan must also be consistent with the Water Services Entities Act 2022 (section 253) provisions for a transport corridor manager that owns or operates a transport stormwater system.
36. Whilst we **support** the general intent of Rule WH.R14: Wastewater network catchment discharges, we have suggestions regarding the approach to progressively reduce and remove wastewater network catchment discharges. The environmentally sound management of wastewater involves the sustainable use and management of water as a whole (Te Hurihanga Wai). Reducing wastewater volume must be in accordance with the principles of the waste hierarchy (avoid, reduce, reuse, recycle) limiting the amount of water taken at source, how water and by products are used -and reused- within a catchment, targeted water loss strategy and the wastewater, and by products, reuse.
37. We **recommend** the PPC1 gives greater emphasis to prioritising Te Hurihanga Wai (the water cycle), recognising the value and necessity of circularity, and integrated management planning and delivery. Any wastewater reduction strategy must be part of an integrated catchment planning approach and include building community awareness of the true value of water.
38. We are pleased to see the cumulative and localised impact of stormwater and wastewater discharges on drinking water supplies and community drinking water supplies given consideration. However, we do consider that drinking water, the sources, protection, allocation and efficient use of need more consideration though the plan, as part of the second obligation of Te Mana o Te Wai.

39. Rule WH.R14 Wastewater network catchment discharges clause 6, should include population decrease as a matter for discretion, not just growth. There are public and environmental health risks to wastewater from decreasing population. Sewers with lower velocities, loads and increased transport time leads to the formation of hydrogen sulphide, which corrodes concrete pipes leading to their failure. A decreasing rating base also impacts the ability to deliver fund planned infrastructure programmes and meet new environmental regulations.
40. We have concerns with Rule WH.R16 which considers new wastewater discharge from a treatment plant (WWTP) or wastewater network into a surface water body or onto or into land that may enter a surface water body as non-complying. We read this rule as preventing any new WWTP to be built, and not just those that discharge to water. This will have implications for urban growth in a catchment, which would be contrary to the Wellington Regional Growth Framework (WRGF) spatial plan for an additional 200,000 people in the next three decades. Water NZ **request** this rule is reconsidered.
41. We **support** the Earthworks rules in both Whaitua chapters.
42. We generally support the rules in Schedule P (Efficient use). However, Water NZ **recommend** the inclusion of an enabling framework for allocating freshwater in the PPC1, that incentivises efficient water use within a catchment. Any directions for freshwater allocation need to be aligned with the Te Mana o Te Wai hierarchy of obligations. Water allocation needs to consider water use in the catchment – water leaks and unaccounted for water can increase the water take, which will affect the health and wellbeing of a river or aquifer and the first obligation of Te Mana o Te Wai.

### Freshwater Action Plans

43. We note the addition of Method M36 and Schedule 27 Freshwater Action Plan (FAP) programmes. We **welcome** that FAP must recognise the value and necessity of integrated management planning and delivery.
44. It is unfortunate that the first iteration of Freshwater Action Plans, to cover all rivers and lakes in the Whaitua Te Whanganui-a-Tara, will only be completed by December 2026.
45. We **recommend** GWRC adopt the process Northland Regional and Auckland Councils have taken to include costed actions plan programmes in the consultation documents for the Long-term Plan process. This will provide certainty and transparency to FAP implementation and ensure funding is considered.



46. The FAP Necessary action 4 (a) should be amended to include Ministers for Building Innovation and Employment to promote source control for copper and zinc from buildings.

### Schedule 30: Financial Contributions

47. Water NZ **support** the approach proposed for financial contributions collected to fund and construct new, or upgrade existing, catchment scale stormwater treatment systems. This is a smart way to mobilise the transformation and transition to water sensitive, nature based water management. There are also interrelated benefits including for mana whenua values, quality of urban life, freshwater rules compliance, adaptation to climate crisis, sequestration and affordability to the community. We seek clarification on two points -
- Has consideration been given for the contributions to fund ongoing operation and maintenance and depreciation of these stormwater treatment systems?
  - The relevant stormwater network utility operator will undertake the capital expenditure work, will the operator inherit the treatment systems?

### Management strategies

48. The new policy and rule framework for stormwater is **generally supported**. However, we are concerned about the resource intensive, multi-layer requirements, conflict and complete duplication of requirements under the Water Services Entities Act 2022, specifically Part 9, Subpart 2 Stormwater provisions. The Water Services Entities Act 2022 require management strategies, network plans, risk plans, environmental performance standards and network rules for stormwater to be produced. The PPC1 requires a Stormwater Management Strategy, Stormwater Management Plans and Stormwater Impact Assessments to be produced for networks and catchments. We consider this to be complete replication of effort.
49. There are many other key plans to be prepared under the Water Services Entities Act 2022 including, but not limited to, asset management plans, infrastructure strategies, Te Mana o Te Wai statements and statement of intent. These are all relevant to, and would add value and efficiency to, PCC1 requirements. In terms of water, Water NZ see opportunities to consolidate or rationalise regulatory planning, monitoring and reporting, and that these requirements can apply across legislative regimes.
50. There is no need to replicate statutory planning processes. The Water Services Entities Act 2022 and the plans and policies required under it should be used to satisfy statutory planning required under the Resource Management Act 1991, Spatial Planning Act 2023 and Natural Built Environment Act 2023- including the regional councils freshwater plans.
51. The same is true for Schedule 32: Wastewater Network Catchment Improvement Strategy. Water NZ consider the requirement for 'a proactive programme of maintenance and renewals of the

public wastewater network infrastructure to improve pipe condition, inflow and infiltration management, and reduces pipe failures as a result of blockages within the network or due to aging infrastructure” describes an asset management plan (AMP). The information to be included by the PCC1 objectives in schedule 32 are integral parts of AMPs, generally produced in accordance with ISO 55000:2014 Asset management. AMPs are required by the Local Government Act 2002, and which are audited by Audit New Zealand, and shortly will be required by Commerce Commission, under the Water Services Entities Act 2022.

52. Any PCC1 policy, rules and consents must also reflect the economic regulator’s information disclosure and price-quality standards monitoring of water services provision. They will review and approve management plans based on consumer protection, and improvements in the quality of service provided to consumers to reflect consumer demands, as well as to work with community in a catchment and will require providers to ‘meaningfully engage’.
53. Water NZ **recommends** that PCC1 requirements for stormwater and wastewater strategies are consumed into a integrated Catchment Planning approach, which is informed by and appends asset management plans and stormwater and wastewater network plans.
54. We **recommend** the regulatory reporting requirements under the PPC1, must support, be consistent with, and not duplicate, the approach taken in the Water Services Entities Act 2022 and by other industry regulators (e.g. Taumata Arowai and the Commission).
55. We **suggest** PCC1 is assessed for consistency and integration, including reviewing all terms, definitions and policy outcomes in the Water Services Entity Act 2022.

### Environmental performance measures

56. The Water Services Act 2021 introduces new mandatory requirements to monitor and report on the environmental performance of drinking water, wastewater and stormwater networks and their operators. Environmental limits and targets that affect three waters infrastructure need to align with the environmental performance measures, targets and standards set by Taumata Arowai in accordance with the Water Services Act 2021, specifically the Network Environmental Performance Measures<sup>5</sup>.
57. Taumata Arowai are currently drafting standards and consent conditions for wastewater networks, overflows and treatment plants and intend to introduce wastewater and stormwater measures at a future date. GWRC should consult with them on any proposed measures, for example the requirements in Schedule 32: Wastewater Improvement Strategy, to ensure consistency in requirements.

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<sup>5</sup> <https://www.taumataarowai.govt.nz/for-water-suppliers/network-environmental-performance-measures/>

**What follows is more general commentary to help guide the development of the PPC1.**

New responsibilities for regulation, monitoring and reporting of water are in effect.

58. As from October 2023, Taumata Arowai are responsible for monitoring and reporting on the environmental performance of wastewater and stormwater services. Regional councils will remain responsible for regulation, compliance and enforcement of fresh, waste and storm waters quality. With Taumata Arowai having oversight and reporting responsibilities for these the environmental performance of drinking, waste and storm water, as demonstrated in this diagram.



59. Under the Water Services Economic Efficiency and Consumer Protection Act 2023, the Commerce Commission is now the independent economic and consumer protection regulator for the New Zealand water sector. They regulate drinking water, wastewater and stormwater infrastructure services and legislative duties in relation to Te Mana o te Wai.

60. Strong collaborative relationships between regional councils and other regulators - Commerce Commission and Taumata Arowai - are imperative to ensure consistent and integrated planning, monitoring and reporting of water services.

61. Inconsistencies in the requirements and the consent and compliance process across consent authorities creates inefficiencies, increases the regulatory burden for designers, technology providers and service providers.

62. It is desirable to reduce these inconsistencies to avoid situations where applicants receive substantially different requests for information, or even different decisions, when making applications for the same type of system.

The new regulation and policy landscape must address non-compliance and lack of enforcement.

63. Water NZ considers that compliance monitoring and enforcement under the RMA is piecemeal and largely ineffective. The decline in freshwater quality over the last 30 years is illustrative of the problem. The new economic and quality water regulators, will bring strong regulatory tools and national oversight of compliance, monitoring, and enforcement across all the matters covered in the RMA –and ensure that poor performance is addressed.
64. Regional councils will remain responsible for regulation, compliance, and enforcement of fresh, waste and storm waters quality and natural hazards policy and planning. Regional Councils must enforce rules and plans in place and proposed – this includes, but not limited to, wastewater treatment plant consenting, sediment and erosion control, and land-use planning restrictions on high-risk susceptible land.
65. Recent flooding and storm events have illustrated an unambiguous need for land use planning decisions and choices to take into account climate risk. In many places, existing planning rules aimed at avoiding building on flood plains, protecting overland flow paths, requiring future-proofed stormwater management or including water-sensitive design are extremely weak or frequently overruled.

More regulatory improvements are necessary for onsite wastewater systems.

66. Water NZ welcome the inclusion in the PCC1 of a Necessary Action regards on-site wastewater discharges - a permitted activity - affecting any freshwater contact recreation site.
67. Water NZ consider more regulatory improvements are necessary for onsite wastewater systems. Aging, poorly designed, unmaintained, or non-complying on-site wastewater systems, if not adequately managed or regulated can lead to in system failures, or worse, significant public or environmental health risk, for example 2016 Havelock North type water contamination event. However, current policies and practices applying to the design and maintenance of onsite wastewater management systems vary. Indeed, little is known about the location, performance, or condition of most of New Zealand’s onsite wastewater systems.
68. The design and installation of on-site wastewater treatment and disposal systems is regulated by:
  - o Building Code- designed and constructed in accordance with Verification Method G13/VM4 Foul Water: On-Site Disposal<sup>6</sup> and
  - o Resource Management Act 1991 in accordance with the District or Regional Plan.

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<sup>6</sup> <https://www.building.govt.nz/assets/Uploads/building-code-compliance/g-services-and-facilities/g13-foul-water/asvm/g13-foul-water-2nd-edition-amendment-9.pdf>

There is no requirement under either regime for on-going performance monitoring or compliance certificates.

69. When considering the relevance of the National Objective Framework, and identifying baseline state and set target attribute states, it would be appropriate for the PPC1 to consider onsite wastewater systems and their potential risk to drinking water supplies, waterbody health and the wider environment. We request policy and rules for onsite wastewater systems consider all stages of a systems design life - design, construction, inspection, maintenance, and compliance inspections. This might include;
- o Setting minimum design, performance standards and maintenance standards. Such conditions or verification methods could be similar to Verification Method G13/VM4 Foul Water: On-Site Disposal which requires on-site systems to be designed and installed to AS/NZS 1547:2012 On-site Domestic-Wastewater Management.
  - o Establishing GIS based recording portal of all systems, including those currently considered to be permitted activities. ECAN in collaboration ESR undertook GIS mapping and assessment of risks posed by systems. Employing consistent approaches for GIS mapping amongst regional councils will help us develop nationally consistent approaches for managing risks over time.
70. We suggest GWRC through Te Ura Kahika, with the Ministry for Building, Innovation and Employment, and the water quality regulator, Taumata Arowai, draft standard consent conditions or verification methods for ongoing maintenance, performance, and compliance of on-site wastewater systems.

#### Engagement with end users is important

71. We recommend GWRC engage further with the future operators of policy, plan, and clauses to ensure what is proposed is workable.
72. This is important for all stages of the water sector- from Te Mana o Te Wai practitioners, to treatment plant designers and operators, to on-site contractors managing sediment and erosion control conditions.

#### Conclusion

73. Water NZ thanks the GWRC for the opportunity to provide comments on the PPC1.
74. Ultimately the PPC1 and Water New Zealand purpose statement are aligned;

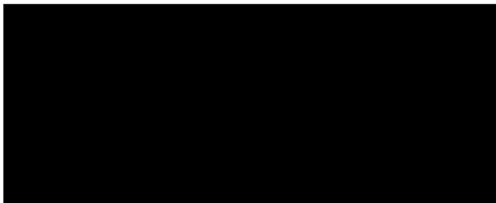
**“Ka ora te wai, ka ora te whenua, ka ora ngā tāngata.  
“If the water is healthy, the land is healthy, the people are healthy”.**



75. The role of both is to promote and enable the sustainable management and development of the water environment to the benefit the environment and society.

76. If you have any queries in relation to this submission please contact [Nicci.Wood@waternz.org.nz](mailto:Nicci.Wood@waternz.org.nz)

Ngā mihi nui



Gillian Blythe  
Chief Executive