

Compliance monitoring assessment


Consent No:	WGN080003 [26182] [26183] [31505] [35047] WGN960094 [1471]	Date: 6 November 2024	Monitoring officer: Qurat Mahmood
Activity:	To discharge treated and milli-screened wastewater to the coast from the Moa Point Wastewater Treatment Plant during various weather conditions, and associated discharges to air and infrastructure in the coastal marine area.		
	<p>Discharge and overflow consents associated with the operation of the Moa Point Wastewater Treatment Plant (WWTP).</p> <p>WGN080003 [31505] Discharge permit allows the continuous discharge of treated effluent from Moa Point WWTP via the 1.8km submarine outfall pipeline.</p> <p>WGN080003 [35047] Discharge permit allows the discharge of mixed disinfected secondary treated and milli-screened wastewater to the coastal marine area during and/or immediately after heavy rainfall where inflow to the WWTP exceeds 3000 litres per second (L/s).</p> <p>WGN080003 [26182] The Moa Point WWTP has a 1.87km subsea main outfall pipeline that discharges the treated wastewater from the Moa Point WWTP to the Wellington South Coast. This pipeline is consented as a structure within the coastal marine area.</p> <p>WGN080003 [26183] Discharge to air from the operation of the Moa Point WWTP.</p> <p>WGN960094 [1471] Discharge to air from the operation of a wastewater pumping station.</p>		

Your compliance rating

This compliance report covers the period from 1 July 2023 through to 30 June 2024. Your compliance rating is below.

		FULL COMPLIANCE All conditions met – well done! No further action required
WGN080003 [26182] [26183]		LOW RISK NON-COMPLIANCE Most conditions met. Some action may be required (see comments below)
WGN080003 [35047] WGN960094 [1471]		MODERATE NON-COMPLIANCE Some condition(s) not met. Action required (see comments below)
WGN080003 [31505]		SIGNIFICANT NON-COMPLIANCE Many condition(s) not met. Immediate action required (see comments below)

Overall compliance summary for Moa Point WWTP:

POOR 	Overall poor management of site and consents. There are repeated and/or multiple breaches of consent conditions. This is resulting in actual or potential environmental effects that are beyond what was considered when the consents were issued. This is considered unacceptable and the consent holder needs to give immediate attention to meeting their consent requirements.
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Comments

Following are the actions required to ensure compliance:

Consent	Actions	Required by
WGN080003 [31505]	Provide a compliance plan to return the Moa Point WWTP to effluent compliance.	30 March 2025
WGN080003 [26182]	Provide an update of the work being done to address the action 1 and 2 recommended in the cathodic protection system assessment report to ensure that the pipeline remains fit for purpose.	30 March 2025
WGN080003 [26183]	Provide an update of the work being done to address the actions recommended in the smoke test report to ensure that the odour containment system remains fit for purpose.	30 March 2025
WGN960094 [1471]	Provide the condition assessment of odour scrubber system to ensure that odour treatment system remains fit for purpose.	30 March 2025

WGN080003 [31505] To continuously discharge up to 260,000 cubic metres per day of secondary treated and disinfected wastewater into the coastal marine area (CMA)

Condition 5 requires a community group liaison (CLG) meeting annually, a CLG meeting was held on 29 February 2024, and meeting minutes were provided. This is compliant with condition 5.

Condition 6 requires to provide the daily discharge volumes and average and maximum flow rates of treated wastewater entering the submarine outfall pipeline with the annual and quarterly reports.

The annual report sets out that in January 2024, the full treatment capacity of the treatment plant was reduced to approximately 2,200 Liters per second (L/s) from 3000 L/s that the consent requires. The reduction in full treatment capacity was due to the second planned refurbishment of one of the three clarifiers after the first refurbishment completed in reporting year 2022/23. The full treatment capacity in Moa Point was returned to 3000 L/s on 25 July 2024 after the project was completed.

The average daily flow rate for effluent was 57,611 m³/day and 95th percentile flow rate for effluent was 79,642 m³/day for this reporting period. As information was provided, this condition is compliant.

Condition 9 requires daily samples to be taken of suspended solids, 5-day carbonaceous biochemical oxygen demand (cBOD₅) and faecal coliforms. These results were provided in the quarterly reports.

Condition 10 of this consent sets limits on the concentration of suspended solids, cBOD₅, and faecal coliforms present in the treated effluent that is discharged out of the long outfall pipeline. The condition has been recorded as **significantly non-compliant** during this compliance period.

Over the course of this compliance period, the following durations of non-compliance with these limits were recorded:

Effluent cBOD₅:

cBOD ₅	Consented Limit	Non-compliant
90-day rolling Geometric mean	20g/m ³	13 April 2024 – 27 April 2024
90-day rolling 90 th Percentile	45g/m ³	26 February 2024 - 25 May 2024

Effluent Total Suspended Solids (TSS):

TSS	Consented Limit	Non-compliant
90-day rolling Geometric mean	30g/m ³	4 November 2023 - end of reporting period
90-day rolling 90 th Percentile	68g/m ³	20 September 2023 - end of reporting period

Effluent Faecal Coliform:

Faecal Coliform	Consented Limit	Non-compliant
90-day rolling Geometric mean	200cfu/100ml	3 December 2023 (one day) and 5 January 2024 - end of the reporting period
90-day rolling 90 th Percentile	950cfu/100ml	1 July 2023 - 22 August 2023 and 30 October 2023 - end of the reporting period

Comment: Quarterly and annual reporting and communication with WWL and Veolia has provided following key reasons for the effluent quality non-compliance.

- asset failures - difficulty in controlling the treatment process (imbalance biomass and poor settleability) in response to asset failures and change in seasons - wet weather events.

- mechanical and electrical component failures of ageing UV system asset have been resulting in limiting disinfection effectiveness.

Greater Wellington Regional Council (GWRC) issued please explain notices on 20 October 2023 to Wellington Water Limited (WWL) for non-complaint effluent quality and a response received on 03 November 2023 states that the overall cause of the non-compliant suspended sediment is due to reduced disposal of sludge (to landfill) to manage the correct level of suspended solids for optimum treatment resulting in poor biomass balance in the process. The response noted that sludge wastage has been limited due to the deteriorated state of the skip bins at the Careys Gully Sludge Treatment Plant, which limits the volume of waste that can be processed for disposal at the Southern Landfill.

The annual report specified that WWL is developing a detailed plan to return the plant to effluent compliance which will define a programme of activities to effluent compliance, centred around short and long-term measures for three key areas: process control and operational administration, maintenance and capital renewal programme.

Summary of compliance actions for non-compliant effluent quality:

- Abatement notices A980, A981 and A982 were issued to Veolia Water Services (ANZ) Pty Limited (Veolia), WWL and Wellington City Council (WCC) respectively on 18 October 2021 and requires these parties to cease the unauthorised discharge of contaminant, namely wastewater from the Moa Point Wastewater Treatment Plant (WWTP) that does not comply with the consent WGN080003.

GWRC issued two infringements notices each to WCC, WWL and Veolia on 01 December 2023 for non-complaint cBOD₅, total suspended solids and faecal coliforms in the effluent discharge in the coastal marine area via the submarine pipeline. One infringement for the non-compliant effluent quality for the breach of Section 15(1)(a) of the Resource Management Act (RMA) 1999 and the other for the breach of Abatement notices A980, A981 and A982.

The continued non-compliance with faecal coliforms and cBOD₅ is a concern and is under investigation.

Action required: By 30 March 2025, provide a compliance plan to return the Moa Point WWTP to effluent compliance.

Condition 11 requires the consent holder to obtain a sample of the treated wastewater and analyse for total arsenic, total cadmium, total chromium, total copper, total lead, total mercury, total nickel, total zinc, phenol cyanide, pH, ammoniacal nitrogen, Oil and Grease.

The annual report provides the results of these samples and demonstrates that the results are all within the consent parameters in condition 11. This condition is compliant.

Comment: It is noted that the levels of ammoniacal nitrogen concentrations have increased compared to the previous reporting period, notably July 2023 (27 g/m³) and April 2024 (21.9g/m³).

Moa Point WWTP was designed for reduction in cBOD₅, TSS and faecal coliforms and not for nutrient reduction or removal through biological nitrification-denitrification. Although the trends show ammoniacal nitrogen concentrations have increased, the current consent does not require ammoniacal nitrogen to be below a specified limit.

Condition 13 requires the consent holder to notify the manager when the effluent quality limit is exceeded. GWRC was notified of the above non-compliances of conditions 10 and 11. This condition is compliant.

Condition 14 states that the discharge shall not result in certain effects beyond 100 metre radius of the discharge point.

A non-compliant sludge carry over bypass from Moa Point WWTP long outfall pipeline on 23 January 2024, resulted in the conspicuous change of water colour beyond 100 metre radius of discharge point and within the proximity of the long outfall discharge point within the coastal marine area in Cook Strait.

- Please explain letters were issued to WWL, Veolia and WCC on 30 January 2024 and 02 April 2024 respectively.

Please explain responses established that the non-compliant bypass was caused by the drain-down of clarifier #2 for the upgrade works involving replacing the main bearing and further refurbishment. The quantity of discharged solids on 23 January 2024 was 33,994kg.

- GWRC issued two Infringements to Veolia on 16 May 2024 for the breach of Section 15(1)(a) of the RMA and the other for breach of cease abatement notice A980 for the sludge carryover bypass via long outfall.
- An advisory notice was issued to WWL on 16 May 2024 to update the standard operating procedure for drain down process and implement procedures for the operations for the major works.
- A formal warning was issued to WCC on 22 May 2024 for the breach of Section 15(1)(a) of the RMA and for breach of cease abatement notice A982.

Condition 19 requires quarterly monitoring reports to be submitted. These were provided and this condition is compliant.

Condition 20 requires an annual report, this was provided. The contents of this report are detailed and comprehensive and is considered compliant with the requirements of this condition.

An assessment of environmental effects (AEE) for the ongoing non-compliant wastewater discharged to CMA was provided alongside the annual report titled "*An Assessment of Environmental Effects of Non-Compliant Wastewater discharges, 2023 - 2024*" where the report states:

- Increased loads of suspended solids discharged from 2020/21 to 2023/24 might, in the worst case, have formed a visible plume in surface waters over the outfall diffuser when viewed from an elevated position, however for most of the time the plume would have been barely visible.
- The oil & grease content of the discharge remained relatively low and would have been barely discernible in surface waters above the outfall diffuser due to high level dilution achieved by the multiport diffuser. The discharge is not likely to have produced any scum or foam or objectionable odour in surface waters near the diffuser.
- The loads of total metals and total ammonia nitrogen discharged would not have exceeded marine default guideline values in receiving waters after initial mixing.
- The information available from annual pipeline condition survey reports, including photographs of the diffuser risers and the surrounding seabed, suggests that if ecological changes have occurred since 2018, they are likely to be relatively minor.
- In this type of dispersive receiving environment, the risks associated with an increased contaminant load in the WWTP discharge, such as eutrophication and toxicity, are very much reduced because fine sediment and associated contaminants are not able to accumulate on the seabed due to relatively strong seawater currents.
- Increased microbiological load discharged has resulted in a negligible increase in illness risk for those engaged in full contact recreation activities at Princess Bay, Lyall Bay and Breaker Bay.
- The long ocean outfall and multiport diffuser have played a critical role in mitigating the adverse effects of poorer quality wastewater by separating the point of discharge from sensitive receptors and by ensuring a high level of initial dilution.

WGN080003 [35047] To occasionally discharge up to 4500 litres per second of mixed disinfected secondary treated and milli-screened wastewater to the coastal marine area when inflows exceed 3000 litres per second.

During this reporting period five unconsented bypass discharges happened via the short outfall pipeline near Tarakena Bay into the coastal marine area.

- Please explain letters were sent on 17 August 2023 and 3 October 2023 to WWL requesting an explanation why the non-consented discharges occurred via short outfall on 16 August 2023 and 27 and 30 September 2023.
- Responses received stated heavy rain resulted in elevated flow and the reduced capacity at the inlet pumping station (IPS) to convey the inflow of wastewater out of the wet wells up to the Moa Point WWTP due to mechanical failure of degraded riser pipes.
- GWRC issued a to-do abatement notice A1074 to WWL on 20 October 2023 (Amended on 21 November 2024) to complete the Moa Point WWTP IPS upgrade (Phase 1) by 01 December 2023. Phase 1 of the upgrade work involved the full replacement of four out of ten discharge

risers, The Phase 1 was completed on 21 November 2023; however, additional upgrades were required to ensure the IPS was at design capacity.

- WWL commenced Phase 1b of IPS renewal project on 18 March 2024 and further two short outfall discharges happened on 12 April 2024 and 2 May 2024.
- Please explain letter were issued to WCC, WWL and Veolia on 23 April 2024 and 11 June 2024 respectively.
- Responses stated showed that the short outfall discharges occurred due to heavy rain in the catchment and the reduction in the pumping capacity due to the IPS renewal project Phase 1b (discharge risers and pumps) where IPS wet well #1 had been taken out of service for maintenance.

It is noteworthy that even before the shutdown of wet well #1 for the execution of the Phase 1b upgrade project, the IPS already had reduced pumping capacity due to the mechanical failures.

The Phase 1b of the project was carried out from 18 March to 16 May 2024 which involves the replacement of the two risers in wet well #1 and replacement of an isolation penstock.

Final phase of IPS upgrade is set to commence in summer 2024/2025 period.

WWL acknowledged in their please explain response that the short outfall discharges are an unavoidable risk while construction takes place, and the renewal project will ultimately resolve pumping capacity limitations of the IPS through the replacement of failed and failing components and prevent any future short outfall discharges.

It is appreciated that WWL has provided regular updates on IPS upgrade project via notifications and monthly meetings.

Condition 2 requires that this permit is only exercised when the wastewater inflow exceeds 3000 litres per second (L/s). There have been no bypasses via long outfall pipeline when the wastewater inflow exceeds 3000 L/s in the reporting period.

On five occasions of un-consented discharges from the short outfall pipeline the overflow contingency plan was followed.

Condition 6 requires that interested parties are notified of a bypass event as soon as practicable and at least within 12 hours of the discharge.

GWRC received notifications for the un-consented discharges via short outfall. Please continue to ensure interested parties are notified as soon as practicable going forward.

Condition 7 requires signage after a discharge event at Dorrie Leslie Park, Tarakena Bay and Lyall Bay. The quarterly reports stated that signs were opened to notify about discharges.

Condition 8 requires the permit holder to monitor and record the flow rate, total volume and duration of any bypass discharge from the Moa Point Wastewater Treatment Plant to the long outfall and calculate and record a dilution ratio. This has been provided in the annual report.

Condition 9 requires the consent holder to keep an incident log, this has not been requested by GWRC.

Condition 10 of this consent requires the consent holder to carry out shoreline monitoring following each bypass.

The sampling results from the short outfall discharges have been provided in Appendix II of the annual report.

Condition 13 of this consent requires the consent holder to submit a report detailing what steps have been taken in the reporting year and what steps are proposed to be undertaken in the future to reduce infiltration and stormwater ingress into the Wellington City sewerage network.

WWL submitted an updated report for the inflow and infiltration report for 2023/2024 reporting period showing the work done in this reporting year and planned for financial year 2024/2025, therefore this condition is compliant.

Condition 16 requires the permit holder to provide suitable wastewater sampling locations for monitoring the quality of bypass flows and secondary treated wastewater.

Sampling was not initiated for the 23 January 2024 discharge event as the Veolia and WWL were not aware of the discoloration to the CMA via the long outfall after the event had occurred.

Condition 19 requires that the annual analysis and assessment report is provided to summarise compliance with the conditions. Pages 26 – 28 of the Annual Report provided by WWL addresses the requirements of this condition.

An assessment of environmental effects (AEE) for the un-consented discharge of untreated wastewater to Tarakena Bay through the short outfall was also provided alongside the annual report titled “Moa Point Inlet Pump Station: Discharges to Tarakena Bay through the short outfall” where the report states:

- The overflow of wastewater from the IPS is one of over 100 wastewater network overflow points identified in WWL’s application to Greater Wellington Regional Council to consent wet weather overflows from Wellington’s wastewater collection network. That consent application is in progress and the discharge is currently not consented.
- It is noted that most overflows from the IPS occur during periods of sustained wet weather when wastewater flows are greatly increased (up to 10-fold) by stormwater and groundwater ingress to the network, and when contaminant concentrations are diluted (also up to 10-fold) below the average concentration.

- Currently, the risk to marine biota remains low due to the low frequency, low volume, and short duration of short outfall discharges. It is noted however that if the frequency of discharge continued to increase, the risk of adverse effects on the nearshore intertidal and subtidal marine ecology would also increase.
- The risk of gastrointestinal infection for recreational users of the near shore waters of Tarakena Bay would be unacceptable if full contact activities such as bathing or snorkelling occurred during or immediately after a discharge event.
- It is recommended that WWL develop and implement a focused public engagement plan with the objective of preventing recreational use of the area at times of elevated risk.

WGN080003 [26182] To occupy the foreshore and seabed of the coastal marine area with an existing submarine outfall pipeline.

The Moa Point WWTP has a 1.87 km submarine outfall pipeline that discharges the treated wastewater from the Moa Point WWTP to the Wellington South Coast. This pipeline is consented as a structure within the coastal marine area.

Condition 3 requires the consent holder to undertake an annual physical assessment of the condition of the outfall pipeline. The assessment was carried out in February and March 2024. This assessment report can be found in Appendix V: Outfall pipeline assessment: Moa Point Pipeline 2024 Annual Inspection Report and Cathodic Protection system assessment Moa Point Wastewater Outfall Pipeline. This condition is compliant.

Cathodic Protection (CP) system assessment Moa Point Wastewater Outfall Pipeline:

This report concludes that the sacrificial anode CP system has operated for 27 years and is performing satisfactorily for Moa Point wastewater outfall pipeline. Based on the potentials recorded the anodes are performing satisfactorily. Compared to previous readings they do not show evidence of approaching the end of their life (i.e. trending more positive results).

The following actions are recommended to ensure effective operation of the cathodic protection system:

- 1- Investigate the isolation location and/or make a plan for achieving isolation in the test point manhole should the existing unknown isolation fail.
- 2- Including the entire buried portion of the pipeline within the CP system.
- 3- Continue to inspect the CP system of Moa Point wastewater outfall pipeline on annual basis by trained and qualified cathodic protection personnel.

Action Required: By 30 March 2025, please provide an update of the work being done to address the action 1 and 2 recommended in the CP system assessment report to ensure that the pipeline remains fit for purpose.

Comment: GWRC noted that WWL engaged a different consultant from previous years to assess the CP system and the CP assessment results contrast with previous year's annual report 2022/2023.

The assessment report for Outfall Pipeline Inspection 2022/2023 concluded that loss of pipeline corrosion protection from existing sacrificial anode CP system is likely within next 2 to 4 years.

GWRC requested a reason for the change and WWL stated they decided to engage a different consultant from previous years to assess the CP system and is a common practice in consultation to ensure the advice that has been previously given is accurate and comparisons in results can be analysed internally.

WGN080003 [26183] To continuously discharge contaminants (including odour) to air from the Moa Point Wastewater Treatment Plant ventilation system

Discharge permit WGN080003 [26183] permits the emissions to air from the Moa Point WWTP.

Condition 2 requires that a maximum volume of deodorised air discharged shall not exceed 25,000 L/s, 90, 000 m³/hr or 2,160,000 m³/day.

No evidence to show compliance with the condition 2 was provided, this is technically non-compliant.

Comment: For future annual reports please demonstrate if compliance with this condition has been achieved. In case of failure to comply with this condition enforcement action will be taken. This point has been raised in the previous annual report for 2022/2023 reporting period as well.

Condition 7 of this consent requires the consent holder monitor air quality in the vicinity of the plant to confirm the absence of faecal coliforms and salmonella originating from the plant at least once every 6 months.

The ambient microbe monitoring was performed at the Moa Point WWTP in September 2023 and April 2024. This assessment report can be found in Appendix VI: Ambient Microbe Monitoring. This testing confirmed the absence of faecal coliforms and salmonella. This is compliant with condition 7.

Condition 8 of this consent requires that hydrogen sulphide (H₂S) and reduced sulphur compounds shall be monitored in the deodorized gas discharge. The results of this monitoring were provided in the WWL annual report.

Condition 9 requires the discharge to air from the chemical scrubber system shall contain no more than 0.01ppm hydrogen sulphide (H₂S) and no more than 0.05ppm total reduced sulphur compounds (including H₂S).

Monitoring results showed the reading for hydrogen sulphide as zero in February and March 2024. This was due to faulty instruments and was repaired in April 2024.

In March and April 2024, the plant exceeded 0.005ppm total reduced sulphur requirement set in condition 9 of this consent.

The March exceedance was related to a failed transmitter that controls the pH and oxidation reduction potential levels in the scrubber vessels which was repaired. The significant leak in the post-scrubber air ducting resulted in April exceedances and was later repaired.

Condition 10 requires undertaking smoke testing of the Moa Point WWTP and ventilation system. A smoke test was performed on the WWTP in January 2024. The smoke test report can be found in Appendix VII: Smoke Test Report. The assessment confirmed that odour control system is providing sufficient extraction to maintain negative pressure, therefore minimising the potential for any fugitive odour emissions. Therefore, compliance with condition 10.

Comment: The smoke testing report recommended following maintenance actions for the effectiveness of the odour control system.

- 1- Examination of the extraction duct found the flow control baffle to be severely degraded and in extremely poor condition which could potentially be reducing the effectiveness of the odour control system. Hence, it is recommended that the primary treatment flow control baffle be replaced, and the associated ducting repaired.
- 2- The visual assessment found the odour containment system to generally be in a poor condition increasing the risk of fugitive odour emissions. Therefore, it is recommended that the secondary treatment containment system be upgraded to rectify the poor condition of the seal and observed leaks.
- 3- Examination of the extraction ducting found the flow control baffle for the MBBR tanks and RATs/ SCRTs to be in a poor condition and it is recommended the MBBR and RATs/SCRTs flow control baffles be repaired or replaced.

Action Required: By 30 March 2025, provide an update of the work being done to address the recommended actions and ensure that the odour containment system remain fit for purpose.

Condition 13 requires the permit holder to keep a record of any complaints that are received.

WCC and GWRC received two odour complaints. WWL reported that no odour assessment was undertaken as WWL were notified a day later. WWL supplied H₂S records from plant showing low H₂S levels indicating that the plant was operating normally, therefore, not the source of odour.

Condition 14 requires an annual monitoring report summarising compliance with the conditions of this permit.

This assessment was provided in the annual report.

WGN960094 [1471] To discharge contaminants to air from the operation of a wastewater pumping station

Condition 8 requires that the pumping station and chemical scrubber are operated in accordance with the Operation and Maintenance Manual provided for condition 7. This was confirmed in the Annual Report.

Condition 11 of this consent requires that the pumping station stack shall be tested monthly for hydrogen sulphide (H₂S) and total reduced sulphur compounds (TRS). The concentrations shall not exceed 0.01 ppm and 0.05 ppm respectively.

Monitoring results showed the reading for hydrogen sulphide as zero in January, February and March 2024. This was due to faulty instruments and was repaired in April 2024.

In April, May and June 2024, the plant failed to comply with the hydrogen sulphide (H₂S) concentration requirement for air discharge quality set in condition 9 of this consent. The high values for H₂S in the final quarter is attributed to faults with the instrument.

WWL has reported in annual report that the odour scrubber system will undergo a detailed condition assessment in the 2024/25 financial year to identify any potential problems and improvements that can be made moving forward to improve odour treatment at the plant. The findings will be shared with GWRC and updates will be provided as any remedial works take place.

Action Required: By 30 March 2025, provide the condition assessment of odour scrubber system.

Condition 12 requires that prior to any maintenance work being carried out, the operator shall notify GWRC. Notifications were provided complying with condition 12.

Condition 14 requires that any incident that could have caused or has caused adverse effects on the environment at or beyond the boundary, shall be notified to GWRC within 24 hours.

No assessment for this was provided.





Comment: Please provide this assessment going forward for next compliance period and beyond.





Conclusion

Please note that the Greater Wellington Regional Council (GWRC) has a responsibility to enforce the Resource Management Act 1991 (RMA). Accordingly, you should take all necessary steps to ensure you comply with your obligations under the RMA, including all conditions of your consent.

Your consent incurs variable compliance monitoring charges at your consent anniversary. These charges are likely to increase to reflect any additional time spent monitoring your consent to due to non-compliance.

GWRC compliance rating system

	FULL COMPLIANCE – All conditions met – well done! No further action required <ul style="list-style-type: none"> All conditions assessed are met including supplying information and/or records
	LOW RISK NON-COMPLIANCE – Most conditions met. Some action may be required <ul style="list-style-type: none"> Minor breach of effects based conditions or works outside scope of consent with low risk of adverse environmental effects Breach of conditions which is technical in nature (eg, failure to submit monitoring report or records)
	MODERATE NON-COMPLIANCE – Some condition(s) not met. Action required <ul style="list-style-type: none"> Repeated failure to supply monitoring report or records. Breach of conditions where there are some environmental consequences and/or moderate risk of adverse environmental effects
	SIGNIFICANT NON-COMPLIANCE – Many condition(s) not met. Immediate action required <ul style="list-style-type: none"> Breach of conditions where there are significant environmental consequences and/or high risk of adverse environmental effects

VERY GOOD 	Overall excellent management of site and consents. The consent holder is proactive in meeting their consent requirements. If issues have arisen concerning consent conditions, the consent holder responds with promptness and effectiveness.
GOOD 	Overall good management of site and consents. The consent holder is generally on top of meeting their consent requirements. Whilst there are some minor breaches of consent conditions, these have no ongoing environmental effects.
FAIR 	Overall the management of site and consents is considered to be fair. There are occasional breaches of consent conditions and/or lapses in providing information to GWRC.
POOR 	Overall the management of site and consents is considered to be poor. There are consistent and ongoing breaches of consent conditions. The consent holder is not getting on top of their consent requirements.

Consent monitoring charges

Each consent receives a consent monitoring charge from GWRC.

This charge is made up of three parts:

- A *customer service charge* that covers the administrative cost of your consent(s);
- A *compliance monitoring charge* that covers all actual and reasonable time associated with assessing compliance with your consent(s) including the time spent visiting and assessing your site, information and reports you submit, file notes, travel time and reporting to you on compliance with your consent(s); and
- A *State of the Environment (SoE) charge* that covers a proportion of the cost of GWRC monitoring the environment that relates to your activity.

For further information on consent monitoring charges, please see our *Resource Management Charging Policy*.

