Compliance monitoring assessment

Consent No:	**WGN080003 [26182] [26183] [31505] [35047]** **WGN960094 [1471]**	Date: 28 November 2025	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.		
	Discharge and overflow consents associated with the operation of the Moa Point Wastewater Treatment Plant (WWTP). **WGN080003 [31505]** Discharge permit allows the continuous discharge of treated effluent from Moa Point WWTP via the 1.8km submarine outfall pipeline. **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. **WGN080003 [26182]** The Moa Point WWTP has a 1.87k 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. **WGN080003 [26183]** Discharge permit permits the emissions to air from the Moa Point WWTP. **WGN960094 [1471]** Discharge to air from the operation of a wastewater pumping station.		

Your compliance rating

This compliance report covers the period from 1 July 2024 through to 30 June 2025. Your compliance rating is below.

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

WGN080003 [31505], [35047]		**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.

Comments

In this compliance period 1 July 2024 to 30 June 2025, Moa Point WWTP has been significantly non-compliant with effluent quality requirements under condition 10 of [31505] and has also recorded multiple unauthorised discharges through both the long outfall into Cook Strait and the short outfall near Tarakena Bay. In addition, Moa Point was non-compliant with TRS levels condition 9 in the air discharge [26183] during the reporting period. The non-compliances can generally be attributed to extended periods operating with reduced capacity (pumping and treatment) as refurbishment and renewal works were completed on the inlet pumping station (IPS) and clarifiers, asset failures and ageing equipment, difficulty in controlling the treatment process in response to asset failures and change in seasons and wet weather events.

During this reporting period GWRC issued two infringement notices each to WWL (I1147 and I1148), Veolia (I1149 and I1150), and WCC (I1151 and I1152).

GWRC also issued a “to do” abatement notice A1112 requiring WWL to complete the final stage of the IPS upgrade by 31 March 2025 to prevent delays and further short outfall discharges.

GWRC also acknowledges the successful completion of the IPS upgrade project by replacing all the riser pipes within timeframe in March 2025. The refurbishments of two secondary clarifiers were also completed and delivered in July 2025. These projects strengthen the plant’s reliability moving forward.

I have included recommended actions from the inspection reports submitted with the Moa Point WWTP annual report in this compliance report and expect WWL to implement them to further reduce the risk of damage to critical assets and any resulting non-compliance and potential environmental effects.

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

During the compliance reporting period from 1 July 2024 to 30 June 2025, the Moa Point Wastewater Treatment Plant (WWTP) operated at reduced capacity due to ongoing upgrades at the Inlet Pumping Station (IPS) and refurbishment of the clarifiers.

From October to December 2024, the IPS pumping capacity was temporarily reduced to 50% to allow completion of the final phase of upgrade works.

Clarifier refurbishment further limited treatment capacity to approximately 2,200 L/s, below the 3,000 L/s required under consent conditions. Clarifier 2 was offline between January and July 2024, Clarifier 3 was offline from October to November 2024, and Clarifier 1 was offline from November 2024 until July 2025. With only two clarifiers in service at any given time, maintaining optimal process control proved challenging for the operations team.

Full treatment capacity of 3,000 L/s was restored on 14 July 2025 following completion of the Clarifier 1 upgrade.

Condition 5 requires a community group liaison (CLG) meeting annually, a CLG meeting was held on 16 April 2025, and meeting minutes were provided. This is compliant with condition 5.

Condition 6 requires the consent holder 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 showed that the average daily flow rate for effluent was 64381 m^3/day and 95th percentile flow rate for effluent was 111,177 m^3/day for this reporting period. As information was provided, this condition is compliant.

Condition 9 requires daily samples to be taken of total suspended solids (TSS), 5-day carbonaceous biochemical oxygen demand ($cBOD_5$) and faecal coliforms. These results were provided in the quarterly reports, therefore this condition is compliant.

Condition 10 of this consent sets limits on the concentration of TSS, $cBOD_5$, 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 $cBOD_5$.

- $cBOD_5$ remained compliant throughout the reporting period with few daily exceedances. The effluent 90-day rolling $cBOD_5$ geometric mean was compliant with the compliance limit of 20 g/m^3 for the whole reporting period.

- The effluent 90-day rolling $cBOD_5$ 90th percentile was non-compliant with the compliance limit of 45 g/m^3 from 13 October 2024 to 17 October 2024.

Effluent Total Suspended Solids (TSS):

- The effluent 90-day rolling TSS geometric mean was non-compliant with the compliance limit of 30 g/m^3 from:
    - 1 July 2024 to 8 August 2024
    - 7 October 2024 to 17 October 2024
    - 22 October 2024 to 21 January 2025
    - 6 February 2025 to 5 March 2025
- The effluent 90-day rolling TSS 90th percentile was non-compliant with the compliance limit of 68 g/m^3 from 1 July 2024 to 19 January 2025.

Effluent Faecal Coliform:

- The effluent 90-day rolling faecal coliform geometric mean was non-compliant with the compliance limit of 200 cfu/100 mL from 1 July 2024 to 19 February 2025.
- The effluent 90-day rolling faecal coliform 90th percentile limit was non-compliant with the compliance limit of 950 cfu/100 mL from:
    - 1 July 2024 to 2 June 2025
    - 7 June 2025 to 19 June 2025

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

- Extended periods operating with reduced capacity (pumping and treatment) as refurbishment and renewal works were completed on the Inlet Pumping Station and Clarifiers
- Asset failures and ageing equipment
- Difficulty in controlling the treatment process in response to asset failures and change in seasons
- Wet weather events

Enforcement Actions

Greater Wellington Regional Council (GWRC) issued “please explain” notices on 20 December 2024 to Wellington Water Limited (WWL) and Veolia, and on 4 April 2025 to Wellington City Council (WCC), in relation to continuous non-compliant effluent quality and unauthorised discharges of wastewater to the coastal marine area from the Moa Point Wastewater Treatment Plant (WWTP).

Responses received stated that Moa Point WWTP biological process experienced an increase in TSS starting in September 2023, which later affected $cBOD_5$ and faecal coliforms. Contributing factors included clarifier outages, equipment failures, and poor sludge settleability. UV system poor performance further reduced treatment effectiveness, while petroleum hydrocarbons entering the plant in late 2024 further reduced UV system performance. Remedial actions have included clarifier repairs, manual operation of the UV system, preventative maintenance, and additional monitoring, alongside planning being carried for UV replacement project.

These investigations for the ongoing discharge of non-compliant effluent quality and unauthorised discharge of wastewater into the coastal marine area (CMA) were carried out for the reporting period from 12 November 2023 (reporting period 2023/2024) to 12 May 2025 (reporting period 2024/2025). Subsequently, on 16 May 2025, GWRC issued two infringement notices each to WWL (I1147 and I1148), Veolia (I1149 and I1150), and WCC (I1151 and I1152). The infringements were issued for the reporting period 16 January 2025 to 12 May 2025. The first infringement notice was for a breach of section 15(1)(a) of the Resource Management Act 1991 (RMA), and the second infringement notice was for failure to comply with a cease Abatement Notices A980, A981 and A982

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 and 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 encouraging to see the ammoniacal Nitrogen levels reduction during this reporting period as compared to level observed last reporting period. It is also important to note that Moa Point WWTP was designed for reduction in BOD, TSS and Faecal Coliforms and not for nutrient reduction or removal through biological nitrification-denitrification, 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 kept informed of the above non-compliances of conditions 10 and 11 via regular notification emails and also organising regular monthly review meetings with WWL and Veolia to discuss the compliance concerns at Moa Point WWTP. This condition is compliant.

Condition 19 requires quarterly monitoring reports to be submitted. These were provided on time. 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. Below this report summarises the information provided in compliance with condition 20.

The annual report also provided an assessment and analysis report reviewing the environmental effects of the non-compliant effluent quality during the reporting period:

- In 2006, the Cawthron Institute was commissioned to predict the dilution and dispersal characteristics from Moa Point WWTP discharges. The most conservative predicted initial dilution that was 95:1 based on a peak flow of 4,000 L/s with a typical dilution of 196:1 that can be achieved within the 100-m mixing radius of the outfall based on predicted 2043 Average Dry Weather Flow of 980 L/s.

- The background seawater concentration data for TSS and faecal coliform were taken from Stantec's AEE Report for Moa Point WWTP, March 2022. A background concentration of 5 g/m^3 was assumed for $cBOD_5$.

- The predicted $cBOD_5$, TSS and faecal coliform concentration in the receiving environment after initial dilution are low, it is expected that it will not result in any long-term adverse effect in the environment.

- The heavy metal concentrations in the treated wastewater discharges are compliant as such the effect to the receiving environment is expected to be minor.

- The long ocean outfall and multiport diffuser play an important role in mitigating the adverse effects of the reduced treatment capacity and poorer effluent quality by separating the point of discharge from sensitive receptors and ensuring a high level of initial dilution.

- *An Assessment of Environmental Effects of Non-Compliant Wastewater discharges, 2023 – 2024* showed that 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.

- The Annual Report also concluded that 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.

- A comparison of data between 2024/25 reporting period and the previous four (4) years showed that the discharge flow increases during winter season and decreases in summer.

- A comparison of data from the 2024/25 reporting period with the previous four years shows a slight decreasing trend in $CBOD_5$ levels. However, this downward trend is not evident for TSS or faecal coliforms, which remain consistently high and frequently non-compliant.

The assessment concluded that the plant was unable to consistently meet its effluent quality compliance requirements during the reporting period. The non-compliances in the effluent quality can be generally attributed to Extended periods operating with reduced capacity (pumping and treatment) as refurbishment and renewal works were completed on the Inlet Pumping Station and Clarifiers, asset failures and ageing equipment, difficulty in controlling the treatment process in response to asset failures and change in seasons and wet weather events.

It is important to highlight that during this compliance reporting period, in March 2025 WWL successfully completed the IPS renewal work project by replacing all the riser pipes. The refurbishments of two secondary clarifiers were also completed and delivered in July 2025. These projects strengthen the plant's reliability moving forward.

WWL has also developed a detailed compliance plan to return the plant to effluent compliance in the reporting period 2024/25.

The plan sets out actions to improve effluent compliance through short term measures involving process control and operational administration and maintenance and longer-term measure that involves capital renewal programmes. The compliance plan is currently in draft under review by the relevant stakeholders before final sign off is made, expected to be in early 2025/26.

WWL shared the draft compliance plan with GWRC on 28 March 2025.

Annual report also outlined upcoming major project works scheduled for 2025/2026 compliance period that would result in strengthening of the plant. These include:

- Significant construction works take place at the plant including further works to link its operation to the Sludge Minimization Facility (SMF) in advanced stages of construction below the plant.

- Ultraviolet Disinfection (UV) system will be fully replaced with physical works expected to begin in December 2025 and finish before the end of the next reporting period.

- Upgrade of electrical and controls components of Moa Point WWTP will also commence physical works during the 2025/26 financial year.

Comment: GWRC appreciates the critical and important upgrades being undertaken at the Moa Point WWTP to help reduce the duration of current and future non-compliance. GWRC continues to work collaboratively by enabling WCC, WWL and Veolia to progress these major projects and expects them to be delivered on schedule without delays.

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.

There were sixteen un-authorised discharges from Moa Point WWTP, during this reporting period.

The non-compliant bypass on 2 July 2024 via submarine long-outfall was due to Wet Weather and reduction in capacity due to Clarifier 2 offline for refurbishment.

The un-consented discharge on 15 November 2024 via the short outfall pipeline near Tarakena Bay into the coastal marine area was due to wet weather conditions resulting in high inflow and reduction in pumping capacity of the Inlet Pump Station (IPS) due to upgrade works.

The non-compliant discharges occurred between 1 January 2025 and 26 June 2025 via the submarine long-outfall within the coastal marine area in Cook Strait were due to wet weather conditions and reduction in treatment capacity of the plant due to Clarifier 1 being offline for refurbishment. The Clarifier was brought back online on 14 July 2025.

Comment: GWRC was notified prior to the commencement of works that bypasses via the long outfall would present an unavoidable risk during construction. GWRC recognises the importance of these critical upgrades to ageing infrastructure and supports Wellington Water Limited (WWL) in undertaking them to ensure long-term compliance.

Throughout the upgrade projects, GWRC has maintained regular engagement with WWL and Veolia to closely monitor progress and ensure that works are delivered on schedule, with no unnecessary delays that could result in further environmental harm. GWRC also appreciates the willingness and transparency of WWL and Veolia in sharing information and providing regular updates and notifications to keep GWRC fully informed.

GWRC applies its strategic compliance framework, based on the four E's: educate, engage, enable, and enforce - to guide its oversight and ensure effective outcomes.

Enforcement Actions:

GWRC carried out investigation into the two short outfall discharges that happened in reporting year 2023/2024 (12 April 2024 and 01 May 2024) due to reduced pumping capacity of the IPS as result of upgrade works. GWRC finalised its decision on 30 October 2024 to issue to do abatement notice A1112 to WWL to complete (implement and make operational) the Moa Point WWTP Inlet Pump Station Upgrades (Final Phase) and bring the maximum pumping back to design capacity of 4000L/s by 31 March 2025. The to do abatement notice also directed WWL to provide a summary report of the works to upgrade and ensure that the Moa Point WWTP inlet pump station is operational to maximum design capacity within two weeks of the completion of the works, or no later than 15 April 2025.

The purpose of the abatement notice was to enable WWL to complete the upgrade works within set timeframes, minimising unnecessary delays to the next stage of the IPS upgrade and reducing the likelihood of further short outfall discharges caused by reduced well capacity during rainfall events in the catchment.

On 27 March 2025, WWL reported that Veolia had successfully finished the final stage of the inlet pump station upgrade ahead of the 31 March 2025 deadline set under Abatement Notice A1112. The IPS is now operating with all 10 pumps in service, and the upgrade included replacing all 10 risers in both wet wells. WWL also submitted a summary report on 14 April 2025 detailing the final phase of the IPS project. I subsequently visited the Moa Point IPS to verify compliance with Abatement Notice A1112, confirmed that the IPS is operating at full capacity, and was satisfied with the completed works.

Comment: Completion of the IPS upgrade work and bringing it back to full capacity is an excellent achievement towards compliance and reducing the risk of short outfall discharges. I also appreciate

the WWL and Veolia for completing the upgrade work on schedule and keeping GWRC informed and sending the required reports on time as required by the to-do-abatement Notice A1112.

Condition 2 requires that this permit is only exercised when the wastewater inflow exceeds 3000 litres per second (L/s).

Moa Point WWTP failed to comply to the flow threshold before a bypass discharge can occur due to the reduction in full treatment capacity arising from the IPS and Clarifiers upgrade works for extended periods of time. The plant had 18 bypass discharges via the long outfall in total during this reporting period. 3 of these discharges were consented and 15 were non-compliant. This is **significant non-compliance.**

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 non-compliant discharges via long outfall as well as short outfall discharge. Please continue to ensure interested parties are notified as soon as practicable going forward. This condition is compliant.

Condition 7 requires signage after a discharge event at Dorrie Leslie Park, Tarakena Bay and Lyall Bay. The quarterly reports stated that signs opened advising of the discharge. This condition is compliant.

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 WWTP to the long outfall and calculate and record a dilution ratio. This has been provided in the annual report for long outfall discharges as well as short outfall discharge.

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 have been provided in Appendix VII 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.

This inflow and infiltration report has been provided in Appendix II of the annual report. It showed the work done in FY 2024/2025 reporting year and further works planned for FY 2024/2025. This condition is compliant.

It is noted that a variety of mitigation measures have been undertaken to reduce Inflow and Infiltration (I&I) and to contain wastewater within the reticulated wastewater network. This work aims to reduce the wet weather flows at Moa Point Wastewater Treatment Plant (WWTP) and to also improve the health of waterways.

Inflow surveys have been undertaken in 2024-2025 financial year in the Moa Point WWTP Catchment. primarily driven by the high level of E. Coli on the environmental water quality monitoring sites, investigation took place in Miramar, Broadmeadows and Newlands.

The report also showed that the key projects completed during this period include the Taranaki Pump Station and rising main, which significantly enhance the resilience of the sewer network in the central business district. Further improvements were delivered through the Wakefield Street stormwater rising main. Additional watermain renewals were completed in areas such as Trelissick Park, Newtown, and Te Aro, contributing to improved network reliability and reduced infiltration. Erosion mitigation works were also carried out along Papawai Stream, along with the rehabilitation of a critical stormwater pipe on Moorefield Road in Johnsonville.

Comment: Please provide results and interpretation for the assessments and surveys done for the inflow and infiltration reports for the next Moa Point WWTP annual report.

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 3 January 2025 long outfall discharge and 15 November short outfall discharge. Therefore, this condition is non-compliant.

Condition 19 requires that an annual analysis and assessment report is provided to summarise compliance with the conditions of this permit [35047]. Pages 26 - 29 of the Annual Report provided by WWL addresses the requirements of this condition. Therefore, this condition is compliant.

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 discharge location off of 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 IV: Outfall pipeline assessment.

The underwater condition assessment inspections of the long outfall showed that the exposed length of the submarine outfall pipeline has remained relatively constant since monitoring commenced. While maximum scour depth adjacent to the pipeline remains stable, the average scour depth within the ‘M’ to ‘D’ positional zone has increased over the period. This scour is predominately due to the cyclic effect of repetitive southerly sea states, resulting in sand and light gravel deposit migration within the shallows and along the shoreline. The result of the underwater inspection of the pipeline route also showed no areas of concern.

Visual investigations were completed around the diffusers that exhibited the greatest scour depths to ensure that none of the bed stabilisation mats were exposed. No exposed erosion control mat material

was observed. No evidence was observed of any damage or deterioration to any of the 18 diffuser assemblies.

The Onshore Section of Pipeline CP Inspection report showed based on temporary coupon testing, the cathodic protection system is operating effectively. The potentials measured on the coupon exposed to the same vicinity of the pipeline and connected to the CP system at test location 'M1', met the criterion for cathodic protection as detailed in AS 2832.1:2015 and AS 2832.5:2008. Cathodic protection for the pipe section from the manhole 'M1' to the plant is not determined due to no access to test locations M2, R1, M3. It is assumed this section of pipe is not protected based on last year survey reading taken at R1.

Subsea Section of Pipeline CP Inspection also showed that the cathodic protection system is operating effectively. The potentials measured on the structure at all tested locations met the criterion for cathodic protection as detailed in AS 2832.3:2005

Recommendations from the CP Survey report:

The following actions are recommended to continue effective operation of the cathodic protection system.

- WWL shall consider the following:
    - Develop a plan to address the following tasks when feasible at the earliest opportunity
    - Drain water from manhole M1 and inspect the pit with the CCE technician.
    - Implement traffic management for inspecting manhole M2, assess the as found conditions, drain any accumulated water and inspect the pit with the CCE technician.
    - Inspect the pipe transition aboveground at the base of hill and evaluate the wrapped joint with the CCE technician.
    - Inspect the manhole M3, assess the as found conditions and drain any accumulated water and inspect the pit with the CCE technician.
- After detailed inspections of M1, M2, R1 and M3, CCE shall evaluate the possibility of installing a bond cable at the isolation joints to integrate the unprotected buried sections of pipe with the existing CP system.
- Continue to inspect the cathodic protection system of Moa Point wastewater outfall pipeline on annual basis by trained and qualified cathodic protection personnel.

Comment and Required Action: GWRC has observed that the majority of recommendations from the current annual survey are consistent with those previously identified by CCP in the 2023/2024 compliance period. This indicates that WWL has not yet addressed the issues highlighted in the earlier

report. GWRC strongly advises WWL to implement the recommended actions without further delay to prevent potential damage to critical infrastructure.

Furthermore, GWRC requests that WWL provide a clear rationale should it consider any of the recommendations unnecessary. In doing so, WWL must demonstrate how the ongoing maintenance of the submarine outfall pipeline will be assured, including measures to minimise erosion of the foreshore and seabed attributable to the pipeline, and to safeguard the structural integrity of the asset.

Please provide a response by **28 February 2025**.

WGN080003 [26183] To continuously discharge contaminants (including odour) to air from the Moa Point Wastewater Treatment Plan 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 litres per second, 90, 000 cubic metres per hour or 2,160,000 cubic metres per day.

No evidence to show compliance with this condition 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 2023/2024 and 2022/2023 reporting period.

Required Action: Please provide the explanation of not providing this information by **28 February 2025**.

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 V: 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 (H_2S) and reduced sulphur compounds shall be monitored in the deodorized gas discharge. The results of this monitoring were provided in the WWL annual report. Therefore, the consent holder is compliant with this condition.

Condition 9 requires the discharge to air from the chemical scrubber system shall contain no more than 0.01ppm hydrogen sulphide (H_2S) and no more than 0.05ppm total reduced sulphur compounds (including H_2S).

Monitoring results showed exceedances of TRS level from October 2024 to March 2025 and then May 2025 to end of reporting period. Therefore, the condition is non-compliant.

GWRC issued “please explain” letters to WWL, Veolia on 4 March 2025 and to WCC on 22 April 2025 to investigate the reasons for the non-compliance. Responses received confirmed that the plant was

unable to consistently achieve compliance with treated air quality requirements for TRS. The chemical scrubber system, which has been in operation since the plant's inception, has exceeded its useful asset life. The potential causes of the elevated TRS levels have been investigated, with WWL engaging an overseas subject matter expert to provide technical advice aimed at restoring consistent compliance. In June 2025, the consultant issued a report outlining several recommended actions. WWL stated that a number of these measures have already been implemented, while others requiring more extensive work are scheduled to be delivered through a comprehensive refurbishment project. This refurbishment project is in advanced stages of planning and is expected to commence early in the next reporting period.

Recommendation: GWRC strongly recommends that WWL prioritise timely delivery of the odour scrubber refurbishment project to avoid prolonged non-compliance and associated environmental risks. GWRC further requests that WWL provide regular updates on implementation progress and demonstrate how interim measures will ensure TRS emissions remain within acceptable limits until full renewal is completed.

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 VI: Smoke Test Report. The assessment identified that while the containment system is degraded with several components requiring repair, the system appears to continue to provide sufficient extraction to minimise the potential for fugitive odour emissions. Therefore, compliance with condition 10.

The report also noted that the work on the IPS has resulted in the odour extraction system no longer being able to maintain a negative pressure within the system, allowing foul air to be released leading to the light moderate sewage odour on site. Unfortunately, this will be an ongoing issue until the IPS is fully contained within the structure of the SMF.

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

1- It is recommended that the primary treatment flow control baffle be replaced and the associated ducting repaired.

2- It is recommended that the primary treatment extraction grill undergo a deep clean to remove the excessive fouling.

3- It is recommended that the primary treatment odour control extraction ducting be repaired to ensure adequate ventilation for operators to routinely work in the area.

4- It is recommended that the all the seals and latches of the northern MBBR tank covers be repaired to prevent potential fugitive odour emissions.

5- It is recommended that high priority be given to the repair of the floor plate seals in the vicinity of the transition from the northern MBBRs to the RATs.

6- It is recommended that all access ports be suitably sealed.

7- It is recommended the MBBR and RATs/ SCRTs flow control baffles be repaired or replaced.

8- It is recommended that the secondary treatment containment system be upgraded to rectify the poor condition of the seals, baffles and all access ports to minimise the risk of fugitive odour emissions.

Condition 14 requires an annual monitoring report summarising compliance with the conditions of this permit. This assessment was provided in the annual report.

The annual report noted that WWL received three complaints regarding plant odour in the reporting period. GWRC received 16 odour complaints in the reporting periods. On one occasion a GWRC duty officer conducted odour investigation survey (ONO) but did not detect any odour at the complainant address. On other occasions duty officers were unable to attend due to other priority investigations happening on call.

Comment: Following the feedback from the community GWRC updated its site-specific protocol for more active notifications of complaints received to be transferred to Veolia for the investigations.

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 WWL Annual Report.

Condition 11 of this consent requires that the pumping station stack shall be tested monthly for hydrogen sulphide (H_2S) and total reduced sulphur compounds (TRS). The concentrations shall not exceed 0.01 ppm and 0.05 ppm respectively.

Monitoring results showed compliance with the condition limits.

Condition 12 requires that prior to any maintenance work being carried out, the operator shall notify GWRC. Notifications were provided to GWRC, 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 of 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 • All conditions assessed are met including supplying information and/or records
	LOW RISK NON-COMPLIANCE – Most conditions met. Some action may be required • 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 • 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 • 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*.