

Compliance monitoring assessment

Consent No:	WGN050359 WGN120142 WGN950162 WGN930193 WGN930194	Date: 20 September 2024	Monitoring Officer: Amanda O'Brien
Location:	Seaview Wastewater Treatment Plant (SWWTP)		
Activities:	Coastal, freshwater and air discharges as well as coastal marine area (CMA) construction and an occupation of the CMA associated with the operation of the SWWTP		
Reporting Period	1 July 2023 to 30 June 2024		

Your compliance rating:

This compliance report covers from 1 July 2023 – 30 June 2024. I inspected the site on 14 September 2023 and again during an informed consent site visit on 14 June 2024. During this reporting period, there were significant non compliances including non-compliant effluent quality to the main outfall, undisinfected discharges to the CMA and discharges to air (odour) that were offensive and objectionable beyond the boundary.

The Consent Holder Manager (WWL) and WWTP Operators (Veolia) facilitate monthly compliance meetings with GWRC, where on-going compliance issues and progress is discussed. Thank you for facilitating these meetings and keeping GWRC up to date with the operations of the Wastewater Treatment Plant.

The WGN120142 suite of consents were granted in February 2013 with a 5-year duration. While the original expiry date is 2018, WGN120142 is currently operating under Section 124 of the RMA.

WGN120142 [31740] – Construction of a temporary channel in foreshore WGN120142 [33407] Discharges to CMA during repairs WGN120142 [33408] Discharge to Waiwhetū Stream during repairs		FULL COMPLIANCE All conditions met – well done! No further action required
WGN120142 [33406] Discharge to Waiwhetū Stream during wet weather*		LOW RISK NON-COMPLIANCE Most conditions met. Some action may be required
		MODERATE NON-COMPLIANCE Some condition(s) not met. Action required
WGN050359 [24539] Main discharge to CMA WGN950162 (01) [1492] Discharge to Air (Odour)		SIGNIFICANT NON-COMPLIANCE Many condition(s) not met. Immediate action required
WGN930193 (01) [47]		Not Assessed

WGN930193 (02) [1369] WGN930194 (01) [484]		Conditions of these consents are not annually assessed.
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** This rating has been provided based on information within the reporting period. It should be noted an investigation into the MOP capacity is underway.*

Overall compliance summary

<p>POOR</p> <p>★☆☆☆</p>	<p>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.</p>
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Comments

Management Plans

- Operations and Management Manual (OMM)
- Management Plan for the Main Outfall Pipeline – Version 1 (November 2006).
- Combined Main Outfall Pipeline Contingency Plan and Public Notification Strategy – Version 4 (December 2021).
- Environmental Management Plan (Odour) - Information included in the contract management plan with Veolia (reviewed annually) and the Operations and Management Manual.

WGN050359 [24539] Discharge Secondary treated and disinfected wastewater to CMA

During the reporting period there were three undisinfected discharges to the coastal marine area due to power outages on 31 January, 08 March and 07 April 2024.

- A please explain letter was issued to WWL on 13 March 2024 with a response received on 09 April 2024. The key reason for the undisinfected discharge is that there is no backup power supply for the UV system when power goes out.
- While non-compliant with consent WGN050359 [24539], these discharges being conveyed to the coastal marine area is an improvement compared to being discharged to the Waiwhetū Stream in the previous reporting period. A formal warning was issued on 03 May 2024 to both WWL and Veolia.

Condition 2 states that the rate of discharge shall not exceed 3,100 l/s or 268,00 m³/day. The annual report shows the discharge was well below the consented limit with effluent discharges across the year between 40,000 m³/day and 110,000 m³/day, consistent with previous years reporting. This condition is compliant.

Condition 6 requires the consent holder to sample treated wastewater daily at the outlet of the disinfection bank, prior to entry into the main outfall pump station as specified in **condition 7**. The samples shall be analysed as detailed in **Schedule 1**. **Condition 8** states that all sampling techniques employed in respect of the conditions of this permit shall be acceptable to the Wellington Regional Council.

The consent holder has undertaken the sampling in accordance with **condition 7** and **Schedule 1**, however, faecal coliform sampling results were not to an acceptable standard as an artificial ceiling on results of 60,000 cfu/100ml (laboratory limit for chosen method on the day) can be seen in data results. These conditions are non-compliant.

An advisory notice was issued to the Operations Manager at Veolia on 06 August 2024 (outside reporting period) with the required action to be taken immediately to “*Update processes to ensure when effluent sampling analysis reaches over 60,000 cfu/100ml that the analysis is updated to allow reporting over 60,000 cfu/100ml*”.

Conditions 9 and **Condition 10** provide effluent quality standards and the requirement to notify GWRC and regional public health if a running geometric mean and/or 80 percentiles exceeds the stipulated values for more than three consecutive days. **Condition 9** is significantly non-compliant for both faecal coliform 90-day geometric mean and 90-day 80th percentile.

Parameter	Condition 9: 90-day geometric mean / 90-day 80th percentile		Condition 10: Notification to GWRC and Regional Public Health after 3 days
CBOD ₅	50 g/m ³ 85 g/m ³	Compliant Compliant	N/A
Suspended Solids	50 g/m ³ 85 g/m ³	Compliant Compliant	N/A
faecal coliforms	1000 cfu/100ml 5000 cfu/ 100ml	Significantly non-compliant Significantly non-compliant	Compliant

On 28 September 2022 abatement notices (A1027, A1028, A1026 and A1029) were issued to HCC, UHCC, WWL and Veolia to immediately cease the discharge of non-compliant effluent quality and to continue to comply thereafter.

The annual report shows the 90-day 80th percentile for faecal coliforms was over the consent limit from 30 September 2023 and is still in exceedance with a maximum to 60,000 cfu/100ml across most of this period. The geomean was over consent limits between 28 October 2023 and is still in exceedance, peaking to around 35,000 cfu/100ml in early March 2024.

It is noted that the calculated results are artificially low with the percentile maximum being 60,000 cfu/100ml (see above comments). It is expected that this percentile maximum would be between 100,000 and 1,000,000 cfu/100ml based on previous summer sampling results if analysis was undertaken with the correct methodology.

A summary of compliance during this reporting period:

- On 02 October 2023 GWRC received notification that Seaview WWTP has become non-compliant with Condition 9(c).
- A please explain letter was sent to WWL on 04 October 2024 and a response was received from WWL on 03 November 2023 with the reasons for the non-compliance stated as:
 - On 05 September 2023, the primary mixer blocked, and the sludge dryer was taken offline. MLSS in the plant increased to around 2500 mg/L resulting in a process solids overload, which in turn impacts the effectiveness of the UV system.
 - Increased cleaning of the UV lamps was unable to be undertaken due to staff illness
 - 3 out of 4 UV banks have not been replaced before recommended hours of use.
 - on 19 September the meter on UV bank 1A was not modulating the UV lamps output for the correct UV dosage automatically.
- A total of eight infringements were issued on 15 November 2023 across HCC, UHCC, WWL and Veolia for breaching section 15(1)(a) of the Resource Management Act 1991 (RMA) and breaching abatement notices A1027, A1028, A1026 and A1029 respectively.
- Quarterly reporting showed continued effluent quality non-compliance. A further please explain letter was sent on 10 May 2024 to both Veolia and WWL requesting an explanation why effluent quality continued to be non-compliant. An email was also sent to HCC and UHCC. A response was received on 31 May 2024 from WWL and Veolia separately. The key reason for the non-compliance was:

- Mechanical and electrical component failures of ageing UV system asset resulting in limiting disinfection effectiveness.
- The please explain responses state capital renewal projects are underway to refurbish the UV system before a full renewal the UV System, along with an upgrade to the Primary Sedimentation Tanks.

Condition 11 requires samples of effluent to meet specific standards for a range of heavy metals and other contaminants monthly. This condition and is compliant.

Condition 13 requires the consent holder to collect coastal receiving water samples at seven locations monthly between November to April and analyse these for faecal coliforms and enterococci bacteria. The sampling was undertaken in accordance with these conditions. This condition is compliant.

Condition 14 requires the permit holder to collect samples of green-lipped mussels in 2023. The annual report states that no samples were taken during this reporting period due to no mussel species being found in the locations stated by the consent. GWRC has advised that a change of conditions (s127) is recommended, and an application has been lodged on 20 June 2024. This condition is technically non-compliant.

Condition 16 requires the permit holder to have and maintain appropriate signs on the shore to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council. Photo evidence of signage in place was requested and received on 06 September 2024. This condition is compliant.

Condition 17 requires the consent holder to submit quarterly reports, and **Condition 18** requires the consent holder to submit an annual report by 31 July each year. GWRC received all quarterly reports and the annual the report was received on 30 July 2024. These conditions are compliant.

An assessment of environmental effects (AEE) for the ongoing non-compliance in faecal coliform requirements was provided alongside the annual report titled “*An Assessment of Environmental Effects of Non-Compliant Wastewater discharges, 2023 - 2024*” where the report states:

- Faecal indicator bacteria concentrations in the Seaview WWTP treated wastewater have been significantly elevated over the last four years.
- Discharge of poor-quality wastewater to the coastal waters at Fitzroy Bay has substantially reduced the quality of nearshore waters close to the outfall during that period where;
 - Recreational users would have been at increased risk of gastrointestinal infection from bathing or diving,
 - Seafood gathers would have increased risks associated with consumption of any shellfish collected,
 - The likelihood occurrence of risks actuating was assessed as low as full contact recreation is rare in Fitzroy Bay due to its isolation, highly exposed aspect, signage warning and filter feeding shellfish such as mussels are very sparsely distributed and do not constitute a recognised seafood resource in the area.
- Wet weather discharges of treated wastewater to Waiwhetū Stream have caused a substantial but temporary reduction in water quality in the stream and downstream in the Hutt River.

- The report states the likelihood of recreational use of Waiwhetū Stream, or the Hutt River is low at such times because of high river flows, the discharges would contribute to faecal contamination of filter feeding shellfish along the Eastern Bays for up to four weeks after each discharge event.

Condition 19 requires the consent holder to investigate ways and means of minimising infiltration and stormwater ingress into the sewerage system. The Inflow and Infiltration Report was provided in appendix III of the annual report. This condition is compliant. Of note the report states:

- Active private drainage inspection occurring in Belmont catchment as of June 2024.
- The Drainage Investigation Team completed smoke/dye testing and CCTV focused on private and public assets in Waiwhetū, Fairfield and Naenae.
- Condition assessments completed as of June 2023 include the western hill culvert in Udy Street, Sewer inspection in Jackson Street, Panorama Grove and Marine Drive.
- Capital projects listed show dedicated ongoing investment in improving both the stormwater and wastewater network as well as wastewater network renewal projects scheduled for 2024-2025.

Condition 20 states the consent holder shall take reasonable steps to monitor and manage trade waste inflows into the sewerage system. The Trade Waste Report was received on 30 July 2023. This condition is compliant. Of note the report states:

- 5.4% of average daily flow to the WWTP is from consented trade waste discharges, 9% of influent suspended solids and 24% of COD.
- 58 incidents of significant non-compliance were reported where samples exceed double the consented quality limits (excluding pH).
- No trade waste consented sites have had significant environmental pollution events during the reporting period, however, the significant non-compliance identified, does increase the environmental risk.
- A total of 1512 premise inspections took place over the 2023 – 2024 annual period, 300 more than the last reporting period.

Condition 21 states the permit holder shall submit a management plan for the main outfall pipeline to the Manager, Environmental Regulation, Wellington Regional Council and that the management plan is to be reviewed and updated once every five years. WWL have advise this plan is under review in 2024.

Condition 22 requires the permit holder to submit an annual report for the main outfall pipeline. This was supplied within the Annual Report. There were no repairs, planned or unplanned, to the main outfall pipeline in 2023/24. This condition is compliant.

Condition 23 states the permit holder shall develop a contingency plan outlining the procedures that will be adopted during a discharge event resulting from emergency works undertaken on the main outfall pipeline. This condition is compliant.

Condition 24 requires the consent holder to advise the manager of any work planned in the next 12 months to repair or replace the pipeline. This condition is not noted in the annual report, it is assumed no repairs are planned for the 2024-2025 reporting period.

Upcoming condition requirements

- **Condition 15** requires the consent holder to undertake a survey of marine subtidal communities is due in 2024. WWL have advised this survey is planned for end of 2024 (next reporting period) due to better sampling and weather conditions.
- **Condition 25** requires a Monitoring and Technology Review Report. The next review report is due in August 2025.

WGN120142 [33406] Discharges to Waiwhetū Stream under wet weather conditions

Condition 2 states that only secondary treated and UV-disinfected wastewater is to be discharged to the Waiwhetū Stream via the Seaview WWTP outfall when flows exceed 1520 L/s and the storm tank is fully utilised.

On 09 December 2021 GWRC issued Abatement Notices A998, A999, A1000 and A1001 to WWL, Veolia, HCC and UHCC, to cease unauthorised dry weather discharges immediately and comply thereafter. No dry weather discharges to the Waiwhetū Stream occurred during this reporting period.

There were 12 discharges to the Waiwhetū Stream that occurred during the reporting period related to wet weather events.

- On 12 April 2024 during wet weather discharge to Waiwhetū Stream the storm tank was not fully utilised as one of the storm tank valves didn't work automatically as intended. WWL notified GWRC on 30 April 2024. This is a technical non-compliance.

Of note, on 17 July 2024 (outside reporting period) WWL notified that the Seaview outfall could only process up to a maximum of 1,100 L/s. An investigation has been initiated.

In accordance with **condition 4** a consultation group is required to be set up. During the reporting period a Community Liaison Group (CLG) meeting was held on 21 March 2024. This condition is compliant.

Condition 5 requires the consent holder to develop a Public Notification Strategy. The current Public Notification Strategy was updated in December 2021 (a combined report with the Main Outfall Pipeline Contingency Plan).

The consent holder has been operating in accordance with this strategy during the reporting period. Comments from CLG include the preference to add a sign on the Hutt Bridge / where fishing occurs and consider the language of the signage. This discussion is ongoing.

Conditions 6 and **condition 7** require the consent holder to notify GWRC and regional public health within eight hours of any discharge commencing and provide details to the GWRC within two days following the discharge ceasing. The consent holder has provided notification within 8 hours of a discharge commencing.

Detailed reporting of discharge events was received within the two-day period; however, Waiwhetū Stream and discharge graphs were not provided for eight (out of 12) discharge reports received. The annual report states instrument failure occurring from October – May 2024. An upgraded flow meter was installed and commissioned in May 2024. This is a technical non-compliance.

Condition 9 requires the consent holder to monitor flow rate, duration, and total volume discharged from the treatment plant for all overflows and **Condition 10** requires the installation and operation of a flow sensor in the Waiwhetū Stream to continuously monitor flow during a discharge event. Condition 10 is non-compliant due to instrument failure from October – May 2024.

Condition 11 and **condition 12** state the sampling requirements during each day of discharge and one day after. Sampling results were provided in the quarterly and annual reports. All events were sampled, one note that for the 28 July 2023, effluent quality results were not provided and as the discharged ceased on 30/07/2023 no day after sampling was provided for 31/07/2023.

Condition 14 states the parameters the samples taken during an overflow need to be analysed for and requires an assessment of the results be provided in the annual report. Condition 14 is compliant.

A critical evaluation by an appropriately experienced scientist has been provided in Appendix IV of the annual report titled: '*Assessment of Effects of wet weather overflow discharges to Waiwhetū Stream*' was provided with the annual report. This report concludes:

- Very high concentrations of faecal coliforms, E. Coli and enterococci were recorded in the treated wastewater. Median values for these parameters are significantly higher than during the 2022-2023 period.
- Discharges occasionally elevate the levels of ammoniacal nitrogen within the lower reaches of Waiwhetū Stream.
- High frequency of overflow events during the reporting year may have increased the level of risk for contact recreation and the aquatic ecology of the Hutt Estuary, although this increased level of risk is temporary in nature, and unlikely to have long term impacts.

Condition 15 requires the discharge to not result in the listed effect and the consent holder to provide photographs of the discharge. This condition is compliant.

Condition 16 requires the consent holder to keep a record of any complaints received. There were no complaints received related to wet weather discharges at the Seaview WWTP. This condition is compliant.

Condition 17 through to **condition 21**, requires the Consent Holder to develop and submit a Tangata Whenua Values Monitoring Plan (TWVMP) in accordance with the Tangata Whenua Values Monitoring Scope (TWVMS), developed by GWRC. Development of the TWVMS has stalled, therefore Wellington Water Limited is unable to continue with development of their plan in accordance with the relevant conditions.

This condition was intended to be in place in 10 years ago, and consideration around the outcomes of the intention of this condition still need to be addressed.

Condition 24 relates to detailed investigations to reduce adverse effects from discharges and **Condition 26** relates to submission of an options assessment. A report covering these conditions was received in August 2017.

WGN950162 [1492] Discharge of odour from the WWTP

Condition 6 states that there shall be no discharges to air that are noxious, dangerous, offensive, or objectionable at or beyond the boundary of the property.

On 14 June 2021 GWRC issued Abatement Notices A956, A957, A958 and A959 to WWL, Veolia, HCC and UHCC, to cease the unauthorised discharge of contaminants, namely offensive and objectionable odour, to air at or beyond the boundary of the property immediately and comply thereafter.

During this reporting period there was offensive and objectionable odour beyond the boundary. This condition is significantly non-complaint. Key compliance actions include:

- There was one complaint received on 25 August 2023 regarding odour from Seaview WWTP. A GWRC officer attended the site, but no odour was detected at the time of assessment.
- There has been a total of 423 complaints received directly to GWRC relating to SWWTP odour between 31 October 2023 and 09 July 2024. In the opinion of enforcement officers, odour was assessed as being offensive and objectionable beyond the boundary of SWWTP, on 13 occasions between 31 October 2023 and 12 December 2023.
- A please explain was issued to WWL on 24 November 2023, and a response was received on 08 December 2023:
 - Odour issues were attributed to the poor state of the bark media in the biofilter prior to 14 November 2023,
 - A project was put in place to complete replacement of the bark media in all six cells,
 - Odour after 14 November 2023 was attributed to maintenance and shut off isolation issues when replacement works began,
 - Mechanical issues on site around the time of initial notifications on 31 October 2023 added to the odour including;
 - one of the two milliscreen augers required replacement and doors were open to remove the auger,
 - a mechanical failure in PST #3 meant that tank was drained down for repair and;
 - clarifier #3 had a wheel failure which meant it had to be operated at reduced flow with a chance of going 'septic' which can lead to odour.
- Infringements were issued to WWL and Veolia on 19 December 2023 for 13 occasions for both a breach of the Section 15(1)(c) and a breach of abatement notices A956 and A957 respectively. Infringements were issued to HCC and UHCC on 19 December 2023 for 13 occasions for a breach of their respective abatement notices A958 and A959 respectively.
- The biofilter bark media replacement was completed on 19 December 2023, however, GWRC continued to receive complaints and continued to assess odour as offensive and objectionable beyond the boundary.
- Additional to the 13 occasions that infringements were sent, there have been at least a further 17 occasions within the reporting period, where odour was assessed by warranted officers as offensive and objectionable beyond the boundary of Seaview WWTP since 12 December 2023.
- A directive abatement notice was issued on 15 August 2024 (outside reporting period) to WWL, HCC and UHCC to replace the biofilter plenum and biofilter cell isolation system by 01 November 2024.

- Further enforcement is likely to include directive measures for milliscreen fan and pipe replacements, milliscreen room and dryer room treatment, external pipe repairs and an assessment to understand the timing of long-term replacement of the dryer with stand-alone odour control to ensure compliance with condition 6.

Condition 11 relates to the preparation of an Environmental Management Plan to demonstrate how conditions in the consent will be met. This management plan is recorded in the contract management plan with Veolia (reviewed annually) and the Operations and Management Manual.

The abatement notice issued on 15 August 2024 (outside reporting period) requires updating the Environmental Management Plan by 01 November 2024 to include a preventative maintenance programme, an annual independent audit of the biofilter and a Corrective Action Record for investigation and actions to be taken when biofilter system measurements are outside the optimum ranges.

Condition 15 relates to the monitoring of air-borne pathogens to demonstrate compliance with **condition 6**. Testing was undertaken on 25 January 2024 using the In-house gelatin filter method. The microbial counts for all sites sampled were well within the guidelines for a waste-water treatment plant.

An ongoing monitoring frequency has been agreed with GWRC on 06 June 2024 with samples to be taken at 3 - 4 locations (north, east, south and downwind) once per year, during summer. If there's any presence of faecal coliforms or salmonella detected, then monthly sampling is to be undertaken until the absence of these microorganisms is established for two consecutive months.

Condition 16 requires the consent holder to keep a record of any complaints received, these complaints shall be forwarded to the manager within 24 hours of receipt. The annual report notes that 244 odour complaints were received to WWL for the annual period.

- Given the volume of complaints, it is unclear if all complaints have been received or if they were received within a 24-hour period. These have been provided when requested.
- Complaints often did not include the time of the incident, the wind direction and speed or the plant operating conditions at the time of the complaint. Subsequent follow up emails did provide this information if available.

Condition 17 requires that any incident that *could have* caused *or has* caused adverse effects on the environment at or beyond the boundary of the site shall be notified to GWRC within 24 hours. A written report detailing reasons for the incident, measures to mitigate the incident and measures to prevent reoccurrence shall be forwarded to the manager within 7 days.

A significant improvement in public communication and notification has occurred across this reporting period. Notifications received include:

- Trade waste pump station maintenance on 25-29 September 2023
- Biofilter media bark replacement on 14 November 2023 (3 months)
- Trade waste pump station maintenance on 16-19 January 2024
- Draining and cleaning of Seaview UV channel 2 on 23 February 2024
- Bowl Swap for Centrifuge 1 on 29 February 2024

- Draining and cleaning UV Channel 2 on 01 March 2024
- Planned maintenance of the UV Disinfection system on 08 March 2024
- Primary sedimentation tank work (by May 2024)
- Planned maintenance of the Trade waste Wet Wells 30 and 31 May 2024

An increase in communication has occurred including regular update notifications of the biofilter upgrade works in November/December and the development of monthly newsletter updates regarding all WWTP updates.

Condition 18 requires that the opacity of all discharges from combustion appliances and the sludge drier shall not exceed 20 %. This condition is compliant.

Condition 19 states that there were no reported visible air discharges from the plant. Since the discharge is directed through a biofilter, the treated air release does not show any opacity, and no visible air discharge have been noted. This condition is compliant.

GWRC have advised that the odour canons require resource consent to operate and do not fall under this consent. WWL have engaged a consultant and pre-application meetings have been held.

Condition 23 states that all fans extracting odorous air and air containing pathogens shall maintain sufficient negative pressure to minimise fugitive air discharges.

The June 2023 Odour Investigation report by Air Quality Consulting NZ notes the dryer building was under slight negative pressure 5 -10 Pa. It is understood some improvements have been made during this reporting period to ensure negative pressure is maintained but further improvements are required.

Condition 24 states that all ducting carrying odorous air shall, be maintained in a good condition and shall be substantially free of gas or liquid leaks.

Evidenced in the June 2023 Odour Investigation report notes several areas around site where ducting carrying odorous air is not in good condition. GWRC was advised that a condition assessment on external ducting (for foul air) has been undertaken in 2024 by WWL, however, this report has not been provided to GWRC upon request.

Ensuring compliance with condition 23 and condition 24 will likely form part of further enforcement action noted above to ensure compliance with condition 6. These conditions are significantly non-compliant.

Condition 25 states that all biofilters shall be designed to ensure gasses are effectively dispersed throughout the filter bed, the sides are designed and constructed to ensure gasses cannot bypass the media and ensure sufficient redundancy to allow maintenance to be carried out on the bed without breach of **condition 6**.

This condition is significantly non-compliant during this reporting period; however, significant progress has been undertaken to bring the biofilter back into compliance through:

- Media is being at end of life – this was replaced on 19 December 2023.
- Evidence of vegetation across top of media (no vegetation should be present) – this has been removed with the replacement of the biofilter bark media.

- Significant short circuiting of gas flow (backpressure, pH evidence) – Plenum replacement to be undertaken by 01 November 2024.
- Escape of odour through poor cell isolation during maintenance - cell isolation replacement to be undertaken by 01 November 2024

WGN120142 [33407] Discharges to the Coastal Marine Area due to leaks and maintenance.

WGN120142 [33408] Discharges to Freshwater associated with leaks and maintenance.

WGN120142 [31740] Construction of a temporary channel on the foreshore to direct treated wastewater discharged from the scour valves.

These consents were not utilised during this reporting period as there were no leaks, planned or unplanned maintenance between 1 July 2023 to 30 June 2024.

WGN930194 (01) [484], WGN930193 (01) [47] and WGN930193 (02) [1369] are associated with the WWTP but do not have any reporting or monitoring requirements, therefore, have not received a compliance rating.

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, or if significantly non-compliant, these may be sent quarterly. These charges are likely to increase to reflect any additional time spent monitoring your consent to due to non-compliance.

GWRC compliance rating system

	<p>FULL COMPLIANCE – All conditions met – well done! No further action required</p> <ul style="list-style-type: none"> All conditions assessed are met including supplying information and/or records
	<p>LOW RISK NON-COMPLIANCE – Most conditions met. Some action may be required</p> <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)
	<p>MODERATE NON-COMPLIANCE – Some condition(s) not met. Action required</p> <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
	<p>SIGNIFICANT NON-COMPLIANCE – Many condition(s) not met. Immediate action required</p> <ul style="list-style-type: none"> Breach of conditions where there are significant environmental consequences and/or high risk of adverse environmental effects

<p>VERY GOOD</p> <p>★★★★★</p>	<p>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.</p>
<p>GOOD</p> <p>★★★★☆</p>	<p>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.</p>
<p>FAIR</p> <p>★★★☆☆</p>	<p>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.</p>
<p>POOR</p> <p>★★☆☆☆</p>	<p>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.</p>

Consent monitoring charges

<p>Each consent receives a consent monitoring charge from GWRC.</p> <p>This charge is made up of three parts:</p> <ul style="list-style-type: none"> – A <i>customer service charge</i> that covers the administrative cost of your consent(s); – A <i>compliance monitoring charge</i> 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 <i>State of the Environment (SoE) charge</i> that covers a proportion of the cost of GWRC monitoring the environment that relates to your activity. <p>For further information on consent monitoring charges, please see our <i>Resource Management Charging Policy</i>.</p>
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