

13 February 2017

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MBIE

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Dear Yasmin

Submission - Building Performance Standards review

1. Water New Zealand appreciates the opportunity to provide a submission on the long term funding projection and standards program in New Zealand.
2. Water New Zealand is a not-for-profit organisation that promotes and represents water professionals and organisations. It is the country's largest water industry body, providing leadership and support in the water sector through advocacy, collaboration and professional development. Members are drawn from all areas of the water management industry including regional councils and territorial authorities, consultants, suppliers, government agencies and scientists.
3. In conjunction with the Rotorua Lakes District Council and the Bay of Plenty Regional Council, Water New Zealand established in 2008 a testing facility in Rotorua to test compliance of manufacturers products in accordance with many elements of the requirements for a National Testing Facility set out in AS/NZS 1546.3: 2008 – Aerated Wastewater Treatment Units.
4. The test facility was established because Water New Zealand and other Councils had been looking at nationwide performance of onsite effluent treatment systems and noted concerns expressed by several regional councils regarding the treatment performance levels and hardware integrity of OSET systems. Given that there are estimated to be some 400,000 of these systems installed in New Zealand (20% of all wastewater discharges) the efficacy of the performance of these systems against the Building Code is highly relevant.
5. As a first step toward improving these matters Water NZ approached BOPRC and RDC, who had created a testing facility in Rotorua, with a proposal to adopt this facility within a national testing programme (OSET-NTP). This recognised that secondary treatment systems and dripline land application was being widely adopted nationwide to replace septic tank and soakage trench systems for rural residential subdivisions, and that the performance capability of treatment systems was based only on manufacturers claims.
6. The OSET-NTP testing facility was set up to assess treatment performance against the secondary treatment requirements for BOD and TSS in AS/NZS 1547:2012 *On-site domestic wastewater management* (ie as cross referenced to and set out AS/NZS 1546.3:2008 *Aerated Wastewater Treatment Units*) and to benchmark treatment capability for five chemical (including nutrients) and one bacteriological parameter plus energy use. The intention is to provide a compliance certificate and performance rating for OSET units that can assist councils, consultants and

consumers to better understand the treatment capabilities of systems currently on the market in order to protect the subsequent land application system and the receiving environment.

7. To date some 43 manufacturers systems have been tested over the past 9 years. We encourage Councils to only approve the installation of systems that have been tested and satisfactorily been approved as meeting the requirements of the Standard. A number of Councils are now requiring treatment plants to comply with either AS/NZS 1547 (ie AS/NZS 1546.3) or to have OSET-NTP certification.
8. There are in fact a number of Standards in the onsite wastewater treatment space:
 - AS/NZS 1547:2012 wastewater management
 - AS/NZS 1546.1:2008 Septic tanks
 - AS/NZS 1546.2:2008 Waterless composting toilets
 - AS/NZS 1546.3:2008 Aerated Wastewater Treatment Units
 - AS 1546.4:2016 Greywater systems
9. From 2013-2016, Standards Australia reviewed AS/NZS 1546.3. New Zealand decided not to participate in the review for whatever reason and Standards Australia proceeded to review the Standard as an Australian only Standard. That has now been completed and the balloting is finalised. It will be republished this year as AS1546.3:2017 with the Miscellaneous Publication MP101 '*Onsite Domestic Wastewater Management – Conformity Assessment Requirements for AS 1546.3 and AS 1546.4*'. This standard specifies the requirements for a National On-site Wastewater Testing Facility, which are now different from those set out in AS/NZS 1546.3:2008 thereby impacting upon our testing facility in Rotorua.
10. In your schedule of Standard proposed for review, Standards NZ did not note AS/NZS 1546.3:2008 as requiring review. We believe there is an **urgent** need to include AS/NZS 1546.3:2008 Aerated Wastewater Treatment Units within the list **for review with a high priority**. New Zealand needs to decide with some urgency whether we wish to adopt the new Australian Standard. Without this our standards and requirements for on-site wastewater management (which affect some 20% of NZ houses) will separate from Australia.
11. The Consultation Paper has a priority listing of standards for review with item 50 = AS/NZS 1547:2012 at a priority rating of 7. We submit that AS/NZS 1546.3:2008 should also be on the list and should have a high priority rating. It could be simply an adoption after review of the new AS 1546.3:2017 thereby minimising input requirement and cost.

Sincerely



John Pfahlert

Chief Executive