



SUMMARY NOTES FROM THE RESOURCE CONSENT CONSISTENCY WORKSHOP HELD 23 AUGUST, 2013

Nick Walmsley





Who Were There?

- 86 attendees from utility owners, managers and advisers with some industry representatives. No central government, no regional council staff.
- A full set of presentations and notes is available at http://www.waternz.org.nz/Category?Action=View&Category_id=317





Presentations

- 1. Point Source Discharge Consents: Costly, Unachievable, Inflexible and Inconsistent - AWT**
- 2. Consent Consistency – Method of Measurement
Defining Compliance – OPUS**
- 3. Percentile Standards: Rationale, Implementation and a Few Misconceptions – NIWA**





Presentation contd.

- 4. Inappropriate Setting of Measurements without Understanding the Instrument Accuracy or Measurement Protocols - Scottech Instruments**
- 5. Problems with Consent Limits for Small Wastewater Treatment Plants – MoH**
- 6. Why Consent Land Treatment Systems? – LEI**





Workshop

Questions:

1. What issues have yet to be raised? Examples?
2. What are the top 5 issues to solve and why?
3. What can be done to create improvements?
4. In order to create improvements, who should be:
 - Communicated with?
 - Trained?
5. What do you think should happen next?



Responses - Standardisation

- Guidelines e.g. ANZECC, are applied as standards and also to inappropriate situations e.g. surface water determinands applied to ground water.
- Avoid monitoring with no compliance limit as rarely related to actual risk.
- Degrees of non-compliance not understood; minor e.g. one parameter peaking vs system failure.
- Monitoring needs to be specific to the determinand; there is no point setting a particular log removal of 'virus' as specific health risks and specific treatment processes can be different for individual virus.



Responses - Standardisation

- **Old consent clauses are used as draft for new consents inappropriately i.e. without sufficient scrutiny of the actual risks**
- **Template standardised and plain English wording for conditions and compliance monitoring protocols and where they apply?**
- **Review of conditions without needing S.127/128 process.**
- **Need to simplify processes for common circumstances. Currently most consents process' are complex, lengthy and expensive. It pressures applicant to agree to poor conditions just to move on.**



Responses - Standardisation

- **Monitoring requirements directly linked to an assessment of the risk of unacceptable discharges (ie monitoring determinands, frequencies, locations and times linked directly to assessment of risks upstream) vs monitoring requirements based on some precedence. This creates a preventative approach to unacceptable discharges as opposed to programmes where monitoring is used as evidence that something has or hasn't occurred – and if it has occurred it is too late. An outcome of the latter is ratchetting of conditions.**
- **There is mention of the need to be mindful of monitoring costs on communities if they don't really serve a purpose.**

Responses – Education

- **Level of technical knowledge highly variable at officer and commissioner level (and some applicants).**
- **Avoid just reducing risk or ‘continuous improvement’ vs cost/benefit assessments to gauge extent of risk.**
- **Best practice notes on technical and process issues needed?**
- **Transparent, searchable databases would reduce resources and errors.**
- **Perhaps register of technical specialists to call on?**

Responses - Communication

- **Need to communicate more with Regional Councils, industry, central government and stormwater groups to increase knowledge of issues and feedback.**
- **Isolated hard copy consent documentation and conditions make transparency and consistency difficult.**
- **Specific Measurable Achievable Relevant Timely compliance conditions with specific monitoring protocols.**
- **Soft copy monitoring record formats that align with receiving database would minimise double handling and allow prompt knowledge of compliance.**