

Draft Water New Zealand Good Practice Guide for the Beneficial Use of Organic Waste Products on Land

Christchurch Meeting 23rd February 2017 – Notes

Nick Walmsley presented slides on behalf of the Steering group summarising the proposed changes to the 2003 biosolids Guidelines. The slides included the formal questions raised within Volume 1. Questions and comments from the floor were encouraged and content noted below. All participants were encouraged to provide written submissions, whether in support or not, by the end of March 2017.

Formal Questions Raised:

- 1. Should the word 'waste' be included in the title and descriptive text? Should it just refer to 'Organic Products' or 'Organic Materials'?**
 - Dairy industry reference to whey, which used to be waste now being a useful product. The words beneficial and waste don't go together. One man's waste is another man's treasure. Not used in the UK. It's a bio product. Context is tricky with legal and regulatory conations.
 - Introductory section doesn't well describe what product we are dealing with ambiguity with paper and pulp as well as animal and human waste.
- 2. Should the proposed 'Type' 1A, 1B etc be used or revert back to the previous Aa, Ab etc nomenclature used in the 2003 Biosolids Guidelines?**
 - Always have to an A, If we are going to change then make a big change, could be colours.
 - Regional council would adapt to a new table.
 - Naming is important we want to enable, its all good and we are just assigning a level of risk,
- 3. Should measurement of emerging organic contaminant limits be mandatory for all biosolids applied to land so that a New Zealand database can be established more quickly, giving a greater ability for evidence based review?**
 - Consent planners will want to look at emerging issues
 - Yes there should be national sampling database.
 - Who would manage the database, if it's mandatory it should be public. Winery versus human waste comparison would be of use long term. Research is being a scare monger, creating a database has double edge that could be used.
 - General consensus there should be a database.
 - If we can't be sure of the effects the testing should be mandatory.
 - How do we define a limit without a database?
 - Talk about the risks of the sampling being built in to consents.
 - The limits might go through but making the testing conditions could be a challenge.
 - There are a lot of parameters already recorded in consents without limits being imposed.
- 4. Volume 1 The Guide is intended to give practical guidance. Is the information clear enough, in the correct format, split adequately between background/supporting information (Technical Manual) and the Guide? How could it be improved?**
 - Should be as concise as possible.
 - It is simple and easy to follow, it's going to be used by a lot of people
 - Refreshing to see the small number of pages.

- 2003 recreational water quality is a good example of a bad document.
- 5. Are there any concerns over the proposed changes? What are they?**
 - Guided by regional councils and what makes its way into a consent.
 - A lot of TLA's have given up on going down the discharge to land route.
- 6. What positive or negative impacts will the proposed changes have on your business?**
 - Cost of testing too high – currently using overseas testing as cheaper
 - Not many testing laboratories – how long until more can test and testing costs reduced?
- 7. Are the changes to the guidelines able to be aligned with current regional and district plans?**
 - Look at regional plans
 - Consent directs and encourages to get right rationale
 - How widely accepted the guidelines are by regulators influences how widely you can distribute it
- 8. Is using the NES for Assessing and Managing Contaminants in Soil to Protect Human Health, April 2012 an acceptable means of protecting human health in the urban environment? If not, what do you suggest as an alternative?**
 - Limited to types of people that will use it.
 - NES is more around disturbing soil for construction,
 - NES doesn't get into pathogens just chemical.
 - HALE list as an exception on biosolids for soil reconditioning that exists at the moment.
 - Limit in NES for soil Arsenic is 17 mg, guide line 30. The issue of applying volume. Discussion on regional councils use of land application limits in use with consenting only an issue if ground soil levels were high to start with.
 - Improvement opportunity in how regional councils apply this, subsection in Vol 2? Perhaps the issue isn't answered succulently enough.
 - How does this fit in with HAZNO, eco and human toxicity.

Other Comments:

- **How do we use the document – role out**
 - Land and water forum.
 - Be a rich person that solves this problem.
- Stock withholding period, checking on background levels before next application.
- Rob Potts has MfE funding to investigate 2 monthly turnaround period.
- Bio solids quality mark. Would there be benefit?