

File No: WAR120258 [31707, 32044, 32045, 33045]

02 February 2024

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For: Nick Hewer-Hewitt [Head of Network Performance WWL]

Dear Nick,

Compliance monitoring assessment for WAR120258 [31707, 32044, 32045, 33045] for 2022/2023 period

Please find attached a compliance monitoring assessment for resource consent WAR120258 for resource consents associated with Martinborough Wastewater Treatment Plant covering the period 01/07/2022 – 30/06/2023.

Abatement Notices A1019 and A1020 were delivered to Wellington Water Limited and South Wairarapa District Council, respectively, on 15 August 2022. The 'cease' abatement notices related to ongoing non-compliant discharges of wastewater to the Ruamāhanga River and adjacent land irrigation area. The 'cease' abatement notices were cancelled on 15 August 2023, and replaced by 'to do' Abatement Notices A1061-A1066 requiring the implementation of the proposed Compliance Delivery Plan. Many of the non-compliances identified within this report are continuances of the non-compliances addressed by the Abatement Notices, therefore no additional actions are required in relation to this annual compliance assessment.

If you have any questions about the monitoring of your consent or your compliance assessment, please contact me on 021 379 920.

Yours sincerely,



Aaron Johnston

Compliance Monitoring & Enforcement Officer, Environmental Regulation

Compliance monitoring assessment

Consent No:	WAR120258	Date: 02 February 2024	Monitoring officer: Aaron Johnston
Activity:	<p>[31707]: Discharge permit – to discharge contaminants from treated effluent into the Rūamahanga River through the whole term of the consent.</p> <p>[32044]: Discharge permit – to discharge treated effluent to land adjacent to the plant (Stage 1B) and the Pain Farm (Lake Ferry Road) (Stage 2A and 2B).</p> <p>[32045]: Discharge permit – to discharge contaminants to air (odours from the ponds and treatment process, and effluent associated with land application).</p> <p>[33045]: Discharge permit – to discharge contaminants to land and water via seepage from the ponds and channel.</p>		


Your compliance rating

This report assesses compliance for the period 1 July 2022 to 30 June 2023.

Individual consent compliance summary for the Martinborough Wastewater Treatment Plant:

32045, 33045		FULL COMPLIANCE All conditions met – well done! No further action required
32044		MODERATE NON-COMPLIANCE Some condition(s) not met. Action required
31707		SIGNIFICANT NON-COMPLIANCE Many condition(s) not met. Immediate action required

Overall compliance summary for the Martinborough Wastewater Treatment Plant:

<p>POOR</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

An assessment of each condition is included below for your reference:

Summary of Conditions Schedule 1: General Conditions		Condition met?			Comments
		Yes ✓	No X	N/A	
1	<p>Except as otherwise required by any other condition of these consents, the activity authorised by this Wastewater Discharge Permit shall be carried out generally in accordance with the following information provided by the applicant:</p> <ul style="list-style-type: none"> • Martinborough Waste Water Treatment Plant - Proposed operation upgrade and maintenance to 2047 - Application for Resource Consents, Activity, Description and Assessment of Environmental Effects, 6 April 2014 including Appendices 1 to 17; • Martinborough WWTP Consent Application – Additional Information requested by the Panel (undated and no page numbers) but received 18 December 2015; • Further information from the applicant dated 2 June 2014. 	✓			The plant has been operated in general accordance with this condition during the annual reporting period.
2	The Consent Holder shall engage in writing with the Manager, Environmental Regulation, Wellington Regional Council, if any contingency works or variation from the consents is required prior to undertaking any activity. This is to ascertain whether the contingency work is within the scope of these consents, or whether a variation to the consents or additional resource consent will be required.	✓			No contingency or variation works have been undertaken.
3	<p>The treatment system shall be upgraded in stages as follows:</p> <p>Stage 1A – commencement of consent</p> <p>Stage 1B – 1 November 2017</p> <p>Stage 2A – 31 December 2030</p> <p>Stage 2B – 31 December 2035</p>	✓			Currently operating within Stage 1B.
4	All discharges to land associated with Stage 1B (i.e. discharge to the “Martinborough WWTP Adjacent” block) shall cease on or before 31 March 2031.			N/A	
5	<p>The Consent Holder shall prepare, within the timeframes stated, the following management and monitoring plans/manuals:</p> <ul style="list-style-type: none"> • Operations and Maintenance Manual • Odour Management Plan • Environmental Monitoring Plan 		X		<p>Based on GWRC records, three of the seven plans have been certified since 2017. GWRC is working with WWL to get the remaining plans completed and approved.</p> <p>The management plans have the following status:</p> <p>Operation & Maintenance Plan:</p> <ul style="list-style-type: none"> • GWRC certified SWDC version in July 2017

	<ul style="list-style-type: none"> • Tangata Whenua Values Management Plan • Inflow and Infiltration Reduction Management Plan • Discharge to Water Management Plan • Discharge to Land Management Plan <p>The plans:</p> <p>a) shall give effect to the relevant requirements outlined in the conditions in Schedules 1, 2, 3, and 4; and</p> <p>b) may be prepared as separate plans; or</p> <p>c) where approved in writing by the Manager, Environmental Regulation, Wellington Regional Council, one or more plans may be combined as a single plan; and</p> <p>d) each plan shall detail which consent conditions the plan is giving effect to.</p>				<ul style="list-style-type: none"> • WWL submitted draft plan in July 2022. • GWRC returned draft to WWL with request for changes August 2022. Certification withheld until requested changes are made. <p>Odour Management Plan:</p> <ul style="list-style-type: none"> • Plan certified Jan 2024. <p>Environmental Monitoring Plan</p> <ul style="list-style-type: none"> • Plan certified September 2022. <p>Tangata Whenua Values Monitoring Plan</p> <ul style="list-style-type: none"> • WWL have conducted a site visit with NKKW and RoW. • NKKW and RoW have been engaged to deliver separate TWVMPs for each iwi. <p>Inflow and Infiltration Reduction Plan</p> <ul style="list-style-type: none"> • Plan certified September 2022. <p>Discharge to Land and Water Management plan</p> <ul style="list-style-type: none"> • Plans combined in a Discharge to Land and Water Plan • Draft plan sent to GWRC in May 2022. • GWRC have withheld certification of DLWMP plan as it proposes a land discharge scheme which conflicts with the consent conditions.
6	Prior to the formal submission of the final document required under Condition 5, each manual and plan listed in Schedule 1: Condition 5 Table 2 shall be reviewed by a suitably qualified independent person. Any comments and inputs received from the independent reviewer shall be clearly documented and attached to the plan, along with clear explanation of where any comments have not been incorporated and the reasons why.	✓			The plans that have been submitted were reviewed by suitably qualified and experienced person.
7	Following each independent review under Schedule 1: Condition 6, the Consent Holder shall submit a draft copy of each of the manuals and plans listed in Schedule 1: Condition 5 Table 2 to the Wellington Regional Council at least 20 working days before it is submitted to the Manager, for technical certification in compliance with Schedule 1: Condition 8. Any comments received from the Council, along with a clear explanation of where any comments have not been incorporated and the reasons why, shall be supplied to the Manager at the same time that the relevant plan is submitted under Schedule 1: Condition 8.	✓			The plans that have been submitted allowed over 20 days for review.
8	The manuals and plans listed in Schedule 1: Condition 5 Table 2 shall be submitted within their respective timeframes to the Manager, Environmental Regulation,		X		Not all plans have been certified and approved in the required timeframes [non-compliant] .

	Wellington Regional Council for their written technical certification.				
9	The objectives of the manuals and plans are set out in Table 3.	✓			The plans that have been submitted meet the objectives in Table 3.
10	<p>The Schedule 1: Condition 9 Table 3 plans and manuals shall:</p> <p>a) Be developed to achieve the following over-riding objectives.</p> <p>(i) From Stage 1B onwards minimise treated wastewater discharges to the Rūamahanga River so far as is reasonably practicable within the constraints of land availability on the Stage 1B site and storage within the existing ponds at their existing bund level; and</p> <p>(ii) From Stage 2A onwards minimise treated wastewater discharges to the Rūamahanga River, so far as is reasonably practicable within the constraints of land availability on the Stage 1B and 2A sites and storage within the existing ponds at their existing bund level.</p> <p>b) As a minimum include, but not be limited to, the information listed in Schedule 1: Condition 10 Table 4.</p>	✓			The plans are being developed to meet the objectives and include the required content for each plan.
11	All the plans and manuals listed in Schedule 1: Condition 5 Table 2 shall be prepared by a suitably qualified and experienced person or persons with expertise in the matters that the individual documents address.	✓			All plans were prepared by suitably qualified and experienced WWL staff.
12	<p>All the plans and manuals listed in Schedule 1: Condition 5 Table 2 shall be reviewed and where necessary updated either:</p> <p>a) annually within one month of the anniversary of the commencement date of these consents; or</p> <p>b) Within three months of implementing a new stage as defined in Schedule 1: Condition 3, Table 1; or</p> <p>c) Where environmental monitoring supports a change. Any change shall be subject to the written technical certification of the Manager, Environmental Regulation, Wellington Regional Council.</p>			N/A	Reviews will commence after a full set of plans are completed, or a significant change is implemented at the WWTP.
13	Where there are any contradictions or inconsistencies between the plans and manuals listed in Schedule 1: Condition 5 Table 2 and conditions of these consents, then the conditions apply.			N/A	
14	The following (or similar wording with the same intent and outcome) shall be included within the Land Discharge Management Plan to be prepared in accordance with Schedule 1: Conditions 5, 9 and 10:			N/A	Discharge to Water and Land Management Plan has not been certified.

	The Consent Holder shall not allow, or enter into any contract or arrangement which would knowingly allow, the discharge of treated wastewater by land discharge directly to crops being grown for the express purpose of human consumption. (Note: The land discharge of treated wastewater to crops (including pasture) for consumption by ruminant animals, irrespective of any intended potential use of those animals for human consumption (including meat, milk, or other product), is not restricted by this condition).				
15	The Consent Holder shall monitor and record wastewater flow and quality according to the frequency, and constituents specified in Schedule 6: Table 1, at: a) the locations specified in Schedule 6: Table 2 and Figure 1 (until such time as the Environmental Monitoring Plan is certified pursuant to Schedule 1: Condition 8); and b) the monitoring locations specified in the Environmental Monitoring Plan (following its certification pursuant to Schedule 1: Condition 8).		X		Monitoring occurred in line with Schedule 6: Table 1 & 2, however an influent flow meter broke in May 2023 [non-compliant].
16	To enable the sampling of the treated wastewater, easy and safe access to a sampling port(s) shall be provided by the Consent Holder and maintained as close as is practicable to those sampling locations specified in Schedule 6: Table 2.	✓			All monitoring locations are accessible.
17	The Consent Holder shall keep inspection records and operational logs which record regular inspections, identify changes in the operating procedures and record unusual events that occur at the plant. Copies of these records shall be supplied to the Manager, Environmental Regulation, Wellington Regional Council, within 20 working days of a written request by the Manager	✓			Daily operator inspection visits are recorded via Infrastructure Data.
18	In respect of monitoring required by these consents, the following shall apply: a) all monitoring techniques employed in respect of the conditions of these consents shall be carried out by suitably experienced and qualified persons; b) all analytical testing undertaken in connection with these consents shall be performed by a laboratory that is IANZ accredited for the analytical tests; c) all soil and water sample analyses shall be undertaken in accordance with the methods detailed in the "Standard Methods For The Examination Of Water And Waste Water, 2012" 22nd edition by A.P.H.A. and A.W.W.A. and W.E.F., or any other method approved in advance in writing by the Manager, Environmental Regulation, Wellington Regional Council; and	✓			All monitoring and testing is completed by Eurofins (IANZ accredited laboratory).

	d) if any monitoring sites are identified as unsuitable, alternative monitoring sites shall be identified and developed after consultation with the Manager, Environmental Regulation.				
19	Where a certified plan or manual contains a monitoring, measurement, or recording methodology which differs from those specific methodologies contained within any condition of these consents, the management plan or manual methodology shall prevail.			N/A	
20	The Consent Holder shall fit measuring equipment to monitor the wastewater flows at the following points and within the timeframes specified: a) Inlet structure: within nine months of commencement of this consent; and b) Land treatment volume: prior to any discharge of treated wastewater to land (for Stage 1B and Stage 2A and 2B respectively).		X		Flow metering equipment is installed at the inlet and the Stage 1B land discharge. Flow meters are also installed downstream of the UV system and of the river. However, the inlet flow meter is currently out of order [non-compliant].
21	Flow volume measuring equipment (including inflow volume; outflow volume (as measured at or beyond the UV plant or beyond) and land discharge volume) shall be maintained in accordance with the Martinborough WWTP Operations and Maintenance Manual (which shall include reference to manufacturer's specifications) for the duration of these consents.	✓			No information provided in annual report. Assume the flow meter has been maintained as required by the OMP.
22	Within three (3) months of the commencement of these consents, the Consent Holder shall install a datalogger and flow measuring device at the wastewater discharge flow measurement point that is compatible with the Wellington Regional Council's Water Data Management System. a) The datalogger shall record the instantaneous treated wastewater discharge at a minimum of 15 minute intervals. The data shall be provided automatically on a daily basis in a format compatible with the Water Use Data Management System; and b) The datalogger unit and flow measuring device shall be installed and maintained by a suitably qualified person in accordance with manufacturer's specifications and industry best practice guidelines, and to the satisfaction of the Manager, Environmental Regulation, Wellington Regional Council.	✓			Flow data is recorded to the data management system daily.
23	Where the flow measuring device measures flow in a pipe, measurement error is to be no more than +/- 5%, and where installed at a weir or open channel, measurement error is to be no more than +/- 10% as an average across the flow range. The measuring equipment must: a) be able to measure cumulative discharge;		X		The inlet flow meter was last calibrated in May 2022. Annual calibration not completed as flowmeter broke in May 2023 [non-compliant].

	<ul style="list-style-type: none"> b) be able to measure instantaneous flow rate; c) be installed in accordance with the manufacturer's specifications; and d) be calibrated annually. 				
24	<p>The Consent Holder shall verify the accuracy of the flow measuring device required under Schedule 1: Conditions 22 and 23 within six (6) months of the commencement of these consents and a minimum of every five years thereafter, and as directed by the Manager, Environmental Regulation, Wellington Regional Council for the duration of this consent to determine if the actual volume of discharge is within +/- 5% as an average across the flow range for a pipe or +/- 10% as an average across the flow range for a weir or open channel.</p>	✓			<p>The post-UV, river discharge and land discharge flow meters were verified to ±1% accuracy on 30/06/2021. The next verification of these flow meters is due during the 2025/2026 reporting period.</p> <p>The old inlet flow meter is broken, therefore cannot be verified. The new inlet flow meter should be verified once installation is completed.</p>
25	<p>The Consent Holder shall provide a Quarterly Data and Exception Report for each three-month period ending 31 March, 30 June, 30 September and 31 December to the Manager, Environmental Regulation, Wellington Regional Council, within 30 working days of the end of each three-month period. The quarterly report shall be provided in electronic format. The quarterly report shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> a) The results of all monitoring undertaken in accordance with the conditions of these consents, with all monitoring data provided in a suitable electronic format; b) A brief commentary on any exceptions identified from the data and reasons for difficulties in achieving compliance with the conditions of this consent; and c) Subject to Schedule 1: Condition 26 a schedule summarising any complaints received during the quarter. <p>Where agreed in writing with the Manager, up to two quarterly reports may be combined into a single report for any such specified reporting period(s).</p>	✓			<p>Quarterly reports have been submitted.</p>
26	<p>The Consent Holder shall provide to the Manager, Environmental Regulation, Wellington Regional Council, an Annual Report by 30 September each year, summarising compliance with the conditions of these consents for the previous compliance year (1 July to 30 June inclusive).</p>	✓			<p>Annual Report has been submitted.</p>
27	<p>Within three (3) months of the commencement of these consents, the Consent Holder shall commence the process to establish a Community Liaison Group (CLG) in accordance with the Terms of Reference included as Schedule 7 to these consents.</p>	✓			<p>CLG was created 9/09/2022.</p>

28	The Terms of Reference shall be incorporated into the Martinborough WWTP Operations and Maintenance Manual; and amendments to the Terms of Reference may be undertaken in accordance with the Terms of Reference and/or the approved Martinborough WWTP Operations and Maintenance Manual without the need to vary the conditions of these consents.			N/A	The Terms of Reference will be included in the revision of the Operations & Maintenance Manual.
29	Within 1 month of commencement of this consent a Martinborough WWTP liaison person shall be appointed by the Consent Holder to be the main and readily accessible point of contact. The Consent Holder shall take appropriate steps to seek to advise all stakeholders and interested persons of the stakeholder liaison person's name and contact details. If the liaison person will not be available for any reason, an alternative person shall be nominated by the Consent Holder.	✓			Nick Hewer-Hewitt is the current WWL liaison person.
30	Within two months of commencement of these consents, the Consent Holder shall develop and implement a robust resource consent compliance management system, including the identification of the person responsible for monitoring compliance. The Consent Holder shall provide a written summary (including templates and examples as relevant) of the compliance system to the Manager, Environmental Regulation, Wellington Regional Council, by the end of the two-month period. A copy of the summary shall also be provided to the members of the Community Liaison Group.	✓			Compliance reporting is ongoing and clear lines of communication and responsibility have been established between WWL and GWRC.
31	<p>For the duration of these consents, the Consent Holder shall:</p> <p>a) maintain signage on the true left and true right banks of the Rūamahanga River in the immediate vicinity of the treated wastewater discharge location which shall at all times:</p> <ul style="list-style-type: none"> (i) provide clear identification of the location and nature of the discharge; (ii) indicate the general frequency and duration of the discharge; (iii) provide a 24-hour contact phone number; and (iv) be visible to the public visiting the area and legible from a distance of 20 metres without unnecessarily detracting from the visual amenity of the area. <p>b) maintain appropriate signage on the boundaries of the WWTP site and land discharge areas which shall be legible to a person during daylight hours, warning that partially treated wastewater is discharged to land and may be present at the site.</p>	✓			Signage was installed during 2020/2021 reporting year.

32	The Consent Holder shall consult with Regional Public Health and provide a copy of their written approval regarding the wording of the signs prior to submitting them for approval to Wellington Regional Council. Written confirmation of the signage placement accompanied by photographs of the signage shall also be provided to the Manager, Environmental Regulation, Wellington Regional Council, within one month of the erection of the signs.			N/A	
33	The access gate to the Martinborough WWTP site shall remain locked at all times that operational staff of the Consent Holder (which shall include authorised contractors) are not present on site, to prevent unauthorised access.	✓			The gate is always locked with a padlock. Locking the gate is the last requirement on the operator daily check sheet.
34	Stock access to the Martinborough WWTP oxidation ponds and discharge channel shall be restricted, except that grazing of the pond embankment by stock shall be permitted under the management of the Consent Holder. All fences or other barriers shall be maintained by the Consent Holder to a suitable stock proof standard at all times.	✓			Fences are installed and suitable for stock, no reports of stock on land.
35	The Consent Holder shall install and maintain fencing to prevent stock access to: <ul style="list-style-type: none"> a) the true left bank of the Rūamahanga River between the Martinborough WWTP and the western side of the natural high flow channel to the west of the Martinborough WWTP for the duration of Stages 1A, 1B and 2A; and b) the additional storage pond(s) for treated wastewater following the commissioning of the Stage 2B upgrade of the Martinborough WWTP. 	✓			The stop-bank is fully fenced to control stock access. However, it is noted that the neighbouring farmer has gates to the area from his paddocks.
36	The Consent Holder shall arrange and conduct a consent information meeting within two months of the date of commencement of these consents. The purpose of the meeting shall be to confirm the conditions of the consents and the responsibilities of the contractor. The Consent Holder shall invite, with a minimum of 10 working days' notice, the Wellington Regional Council and a representative from each key contractor operating the activity.			N/A	
37	The Consent Holder shall keep a record of any complaints that are received with respect to the operation of the Martinborough WWTP including any associated discharge to land area. The record shall contain the following details: <ul style="list-style-type: none"> a) name and address of the complainant (unless withheld by the complainant); b) identification of the nature of the complaint; 	✓			Complaints are recorded in Maximo. No complaints during this period.

	<ul style="list-style-type: none"> c) date and time of the complaint and of the alleged event; d) weather conditions at the time of the complaint; and e) any measures taken to address the cause of the complaint. 				
38	<p>The Consent Holder shall notify the Manager, Environmental Regulation, Wellington Regional Council of all complaints relating to the exercise of these consents which result from a non-compliance with the conditions of these consents, within 24 hours of being received by the Consent Holder, or the next working day. A schedule of all complaints shall be provided with the quarterly report required by Schedule 1: Condition 25.</p>			N/A	No complaints during this period.
39	<p>The Consent Holder shall forward to the Manager, Environmental Regulation, Wellington Regional Council, a copy of any complaints recorded in the Annual Report required by Schedule 1: Condition 26.</p>			N/A	No complaints during this period.
40	<p>The WWTP system shall be maintained in an efficient operating condition at all times. In the event of any treatment failure that is likely to result in deterioration in the quality of the discharge which would affect the receiving environment, and be in breach of any condition of these consents, the Consent Holder shall:</p> <ul style="list-style-type: none"> a) Take immediate steps to remedy and mitigate any adverse effects on the environment caused by the failure; b) Notify the Manager, Environmental Regulation, Wellington Regional Council, within 24 hours after the malfunction has been detected, detailing the manner and cause of that malfunction and the steps taken to mitigate its effects and to prevent recurrence. Notification can be sent to the Wellington Regional Council at notifications@gw.govt.nz and shall include the consent reference and the name and phone number of a contact person; c) Notify the members of the Community Liaison Group within 48 hours of the malfunction has been detected; d) Forward an incident report to the Manager, Environmental Regulation, Wellington Regional Council, within seven (7) working days of the incident occurring, unless otherwise agreed with the Manager, Environmental Regulation, Wellington Regional Council. The report shall describe the manner and cause of the incident, measures taken to mitigate/control the incident (and/or illegal discharge), and measures to prevent recurrence; and e) Notify Regional Public Health within 24 hours of the malfunction being detected. 	✓			The WWTP was maintained in efficient operating condition.

41	Notification in accordance with Schedule 1: Condition 40 (b) and (d)			N/A	No notifications required during this period.
42	42 – 48 Review of Conditions			N/A	

	Summary of Conditions Schedule 2: Discharge to Water	Condition met?			Comments
		Yes ✓	No X	N/A	
1	<p>Subject to the additional restrictions during each Stage imposed by Schedule 2: Condition 2, this permit authorises the discharge of treated wastewater at:</p> <p>a) An annual average daily flow of 650m³/day; and b) A maximum daily rate of 4,300m³/day.</p>		X		<p>a) Annual average daily flow was 942m³/day [non-compliant].</p> <p>b) Maximum daily flow was 2010m³/day.</p>
2	<p>In addition to the maximum rates specified in Schedule 2: Condition 1, discharges of treated wastewater to the Rūamahanga River shall be operated under the following conditions:</p> <p>a) Discharge regime prior to the commissioning of Stage 1B land treatment b) Stage 1B and 2A Discharge to Rūamahanga River</p> <p>Following confirmation of commencement of Stage 1B Land Treatment in accordance with Schedule 2: Condition 6, discharges of treated wastewater into the Ruamahanga River shall not exceed the limits described in Table 1: Maximum Wastewater Discharge Rates.</p> <p>On an annual basis, the Consent Holder shall provide a report to Wellington Regional Council, assessing the discharge against Table 1 (including a monthly discharge volume breakdown), identifying any exceedances that have occurred, and identifying if/as required any improvements or changes to the discharge regime.</p> <p>c) Stage 2B Discharge to Rūamahanga River</p>		X		<p>MWWTP is currently operating within Stage 1B.</p> <p>The max discharge volume was exceeded on 12 days. All volume exceedances were minor (1-2m³) and within expected flowmeter margins of error over a day.</p> <p>On a monthly volume basis, all discharges were well below the limit imposed by the consent conditions.</p> <p>The max discharge rate was exceeded on 100 days [non-compliant].</p> <p>WWL states the instantaneous rate will continue to be non-compliant until an upgrade to the UV pumpstation is funded and completed. This is not currently a priority upgrade as per the Prioritised Improvement Plan, this will be resolved in the future. The daily and monthly volumes are generally compliant, and the effect of instantaneous rate exceedances will result in negligible additional environmental effect.</p>
3 ¹	<p>The following monitoring parameters shall be used to assist with assessing the effects of the wastewater discharge to the Rūamahanga River during Stages 1B, 2A and 2B:</p>	✓			<p>Compliance with Condition 3 for the July 2022 – June 2023 reporting period was as follows:</p> <p>a & b) The Annual Report indicates that there were no oil or grease films, scums or foams, floatable or suspended materials, bacterial and/or fungal slime growths observed by operators, field</p>

¹ Compliance assessed by Traverse Environmental Ltd

	<p>a) The discharge should not cause the production of any conspicuous oil or grease films, scums or foams, or floatable or suspended materials;</p> <p>b) The discharge should not cause bacterial and / or fungal slime growths visible to the naked eye as plumose growths or mats;</p> <p>c) The receiving water should not become unsuitable for consumption by farm animals;</p> <p>d) The visual clarity should not be reduced by more than 30% between upstream and downstream of the discharge;</p> <p>e) The DO concentration should not fall below 80% saturation;</p> <p>f) The QMCI should not be reduced by more than 20% between upstream and downstream of the discharge;</p> <p>g) The concentration of total ammoniacal nitrogen should not exceed 0.400 mg/L;</p> <p>h) The chlorophyll a concentration (mg/m²) should not exceed 120 mg/m²;</p> <p>i) The maximum cover of visible streambed of periphyton as filamentous algae more than 2cm long should not exceed 30%; or</p> <p>j) The maximum cover of visible streambed of periphyton as mat algae more than 0.3cm thick should not exceed 60%.</p> <p>The monitoring parameters shall apply at the GWRC monitoring site located 250m downstream of the Martinborough WWTP discharge, as shown on Schedule 6: Figure 1.</p>			<p>samplers or the public during the reporting period [compliant].</p> <p>c) The ANZECC 2000 stockwater drinking standards are based on nitrate, nitrite and median faecal coliform concentrations. The provided nitrate-N concentrations were transformed into nitrate concentrations, according to the guidelines. Downstream of the discharge, nitrate concentrations (≤ 3.28 mg/L) were well below the 400 mg/L limit. Nitrite-N concentrations were not provided, but as they are typically lower than nitrate-N, nitrite concentrations can in turn be assumed to be below the 30 mg/L limit. Finally, faecal coliform data are not provided in the report or the Appendices. <i>E. coli</i> data are provided, which can only be used as a proxy for faecal coliforms. A Wilcoxon between the concentrations upstream and downstream of the discharge did not indicate significant difference [compliant].</p> <p>d) Visual clarity, as measured by a black disc, did not decrease from upstream of the WWTP discharge to downstream on any sampling occasion [compliant].</p> <p>e) DO concentration did not fall below 80% saturation on any sampling occasion [compliant].</p> <p>f) No macroinvertebrate survey was undertaken during this reporting period [not assessed].</p> <p>g) Total ammoniacal nitrogen concentration did not exceed 0.4 mg/L on any sampling occasion [compliant].</p> <p>h, i, j) No periphyton survey was undertaken during this reporting period [not assessed].</p>
4	<p>If monitoring undertaken under the conditions of these consents demonstrates any of the Schedule 2: Condition 3 monitoring parameters are exceeded then the Consent Holder shall undertake an investigation into the effects of the discharge from the Martinborough WWTP, taking into account the likely effects of upstream contamination. The findings shall be reported in the Annual Report required by Schedule 1: Condition 26.</p>		N/A	No investigation required.
5 ²	<p>Any treated wastewater discharged to the Rūamahanga River shall meet the following standards:</p> <p>a) The concentration of BOD₅ shall not exceed 60g/m³ in more than 4 out of any 12 consecutive monthly test results;</p>	✓		<p>Compliance with treated wastewater standards of Schedule 2-Condition 5 was as follows:</p> <p>a) BOD₅: Concentrations did not exceed 60 g/m³ on any occasion [compliant].</p> <p>b) TSS: Concentrations did not exceed 90 g/m³ on any occasion [compliant].</p>

² Compliance assessed by Traverse Environmental Ltd

	<p>b) The concentration of TSS shall not exceed 90g/m³ in more than 4 out of any 12 consecutive monthly test results;</p> <p>c) The concentration of Total Ammonia-nitrogen (NH₄-N) shall not exceed 30g/m³ in more than 4 out of any 12 consecutive monthly test results; and</p> <p>d) The concentration of TN shall not exceed 35mg/L in more than 4 out of any 12 consecutive monthly test results.</p> <p>e) The concentration of DRP shall not exceed 7g/m³ in more than 4 out of any 12 consecutive monthly test results.</p>				<p>c) NH₄N: Concentrations exceeded 30 g/m³ once (May 2023) [compliant].</p> <p>d) TN: Concentrations exceeded 35 g/m³ on four occasions (March to June 2023) [compliant].</p> <p>e) DRP: Concentrations did not exceed 7 g/m³ on any occasion [compliant].</p>
6 ³	<p>The following UV treatment standards shall apply:</p> <p>a) For discharges up to 3,000m³/day no more than 5 of 10 consecutive <i>E. coli</i> values shall exceed 100 cfu per 100 millilitres, and no more than 2 out of 10 consecutive values shall exceed 1,400 cfu per 100 millilitres; or</p> <p>b) For discharges over 3,000m³/day, UV treatment shall be applied to a minimum of 3,000m³/day and the remaining flow may have no UV treatment.</p>		X		<p>For the assessment of this condition, data from July 2021-June 2023 were used.</p> <p>All <i>E. coli</i> measurements were undertaken on days when discharges were up to 3,000 m³/d.</p> <p>a) The number of samples exceeding 100 cfu/100ml during 10 consecutive occasions exceeded the no more than 5 threshold from July until September 2022. This was due to the continuous high <i>E. coli</i> concentrations that occurred during the 2021-22 period (December 2021 to June 2022), and 2022-23 period (July and August 2022) [non-compliant].</p> <p>The number of samples exceeding 1,400 cfu/100ml during 10 consecutive occasions exceeded the no more than 2 threshold from July until September 2022 and in June 2023 [non-compliant].</p> <p>b) This condition did not come into effect this reporting period [not applicable].</p>
7	<p>All discharges of treated wastewater to the Rūamahanga River under Martinborough WWTP normal operating conditions shall be made via the existing surface discharge channel at the location identified in Schedule 6: Figure 1.</p>	✓			<p>WWL states that all discharges to the river were via the discharge channel.</p>
8	<p>The Consent Holder shall confirm in writing to the Manager, Environmental Regulation, Wellington Regional Council the commencement date of any discharges to land in Stages 1B, 2A and 2B. This confirmation shall be provided no less than 20 working days prior to any discharge occurring on the respective land treatment site.</p>			N/A	
9	<p>A copy of the confirmation required by Schedule 2: Condition 8 shall also be provided to the members of the Community Liaison Group, no more than five working days after the Manager, Environmental Regulation, Wellington Regional Council, has been advised.</p>			N/A	

³ Compliance assessed by Traverse Environmental Ltd

10 ⁴	Subject to Schedule 1: Condition 15 the Consent Holder shall collect representative grab samples from the Rūamahanga River according to the frequency, constituents and locations detailed in Schedule 6: Table 1, Table 2 and Figure 1 respectively.	✓		<p>Compliance with the condition 10 (schedule 2) was as follows:</p> <p><u>Frequency:</u></p> <p>Twelve monthly samples were collected at sites upstream and downstream of the discharge [compliant].</p> <p><u>Constituents:</u></p> <p>Samples were analysed for all the parameters in Schedule 6: Table 1 [compliant].</p> <p><u>Locations:</u></p> <p>The consent holder states that the samples were collected as specified in the EMP [compliant].</p> <p><i>Note: It would be useful if a map of the monitoring sites was included in the annual report.</i></p>
11 ⁵	The Consent Holder shall have an appropriately qualified and experienced ecologist undertake macroinvertebrate sampling annually in the period between January 1 and March 31 at Site U2 as shown in Schedule 6: Figure 1 and 250m downstream of the wastewater discharge point, every year for two years before and after the commissioning of Stage 1B land discharge, and thereafter every second year until such time as a lesser frequency is approved in writing by the Manager, Environmental Regulation, Wellington Regional Council.		N/A	<p>No macroinvertebrate sampling was undertaken due to repeated flood events and continuous high flows throughout this reporting period. Macroinvertebrate sampling was required during periods 2015-16, 2016-17, 2017-18, 2018-19 (two years before and after commissioning of Stage 1B – November 2017), and then every two years (i.e. 2020-21 and 2022-23). A survey was also undertaken during the 2021-22 period, which was not required by the consent condition. Consequently, the missed sampling occasion during the current period does not create a gap larger than one year from the last survey [not applicable].</p>
12 ⁶	The sampling and assessment required under Schedule 2: Condition 11 shall be undertaken following a period of at least three weeks without a significant flood event (defined as an instantaneous river flow exceeding three times the estimated median flow in Rūamahanga River at Waihenga) and during a period of low flow.		N/A	<p>No macroinvertebrate survey was undertaken due to repeated flood events and continuous high flows throughout this reporting period. At no point between 1 January and 31 March was there a period of at least three weeks without a significant flood event [not applicable].</p>
13 ⁷	<p>The macroinvertebrate sampling shall follow Protocols C3 (Hard-bottomed quantitative), P3 (full count with subsampling option) and QC3 (Quality control for full count with subsampling option) from the Ministry for the Environment's "protocols for sampling macroinvertebrates in wadeable streams" (Stark et al. 2001). This shall involve:</p> <p>a) collection of five replicate 0.1m² Surber samples at random within a 20m section of riffle habitat at each sampling site;</p> <p>b) full count of the macroinvertebrate taxa within each replicate sample to the taxonomic resolution level</p>		N/A	<p>No macroinvertebrate survey was undertaken due to repeated flood events and continuous high flows throughout this reporting period [not applicable].</p>

⁴ Compliance assessed by Traverse Environmental Ltd

⁵ Compliance assessed by Traverse Environmental Ltd

⁶ Compliance assessed by Traverse Environmental Ltd

⁷ Compliance assessed by Traverse Environmental Ltd

	specified for use of the Macroinvertebrate Community Index (MCI); and c) enumeration of the results as taxa richness, MCI, QMCI, %EPT taxa and %EPT individuals				
14 ⁸	<p>The Consent Holder shall have an appropriately qualified and experienced freshwater ecologist undertake an assessment of the percentage cover, biomass and community composition of periphyton, filamentous algae and cyanobacterial mats in run habitat, as close as possible to Site U2 as shown in Schedule 6: Figure 1 and 250m downstream of the wastewater discharge point. The periphyton assessment shall be undertaken every year to coincide with macroinvertebrate monitoring and reporting (refer Schedule 2: Condition 11).</p> <p>The periphyton and algal assessment is to include:</p> <p>a) a visual assessment of the percentage cover of both filamentous algae and algal mats (to the nearest 5%) at five points across each of four transects encompassing run habitat and extending across the width of the river at each sampling site. Reported estimates shall include:</p> <ul style="list-style-type: none"> (i) Percentage cover of visible stream bed by bacterial and/or fungal growths (sewage fungus) visible to the naked eye; (ii) Percentage cover of visible stream bed by filamentous algae more than 2cm long; (iii) Percentage cover of visible stream bed by diatoms or cyanobacteria mats more than 0.3cm thick; (iv) Percentage cover of visible stream bed by diatoms less than 0.3cm thick; and (v) Percentage cover of visible stream bed that is clean. <p>b) collection of a composite periphyton sample across each sampling site using method QM-1a from the Stream Periphyton Monitoring Manual (Biggs and Kilroy 2000) at the same established monitoring sites and transects as defined in Condition 10 above (a composite of scrapings from eight rocks, two from each transect), using method QM-1b from the Stream Periphyton Monitoring Manual (Biggs and Kilroy 2000). The composite sample shall be analysed for ash free dry weight and chlorophyll a.</p>		X (low risk non-compliance)	<p>Periphyton surveys are to be undertaken annually. This year's surveys were scheduled to coincide with the macroinvertebrate sampling, and as such, were not undertaken.</p> <p>There were only two small periods when the flow was safe (<40m³/s) for periphyton assessment. These were:</p> <ul style="list-style-type: none"> - 6 days in January (1st – 6th) - 3 days in February (11th – 13th) <p>During these periods it is likely the flow would have still been high (just below 40m³/s) and conditions generally unsafe and unsuitable for periphyton assessment. The high flows also mean that periphyton is likely to have been low during the whole summer period [low risk non-compliance].</p>	
15 ⁹	The findings and results of investigations undertaken in accordance with Schedule 2: Conditions 10 to 14 (including assessment against the parameters in	✓			The annual report provided a detailed explanation as to why macroinvertebrates and periphyton monitoring was not undertaken [compliant].

⁸ Compliance assessed by Traverse Environmental Ltd
⁹ Compliance assessed by Traverse Environmental Ltd

	Schedule 2: Condition 3) shall be incorporated and submitted in Annual Reports, as required by Schedule 1: Condition 26.				
	Summary of Conditions Schedule 3: Discharge to Air	Condition met?			Comments
		Yes ✓	No X	N/A	
1	There shall be no discharges of odour to air that are noxious, dangerous, offensive or objectionable resulting from the operation of the Martinborough WWTP, at or beyond the boundary of the WWTP site as designated (Ds065) in the Wairarapa Combined District Plan.	✓			No odour complaints received during this period.
2	There shall be no discharges of odour to air that are noxious, dangerous, offensive or objectionable resulting from the discharge of wastewater from either the Stage 1B (Martinborough WWTP) or Stage 2A and 2B (Pain Farm) Land Treatment sites, at or beyond the boundary of the respective wastewater discharge areas.	✓			No odour complaints received during this period.
3	There shall be no spray drift that is noxious, dangerous, offensive or objectionable resulting from the discharge of wastewater from either the Stage 1B (Martinborough WWTP) or Stage 2A and 2B (Pain Farm) Land Treatment sites, at or beyond the boundary of the respective wastewater discharge area.	✓			No odour complaints received during this period.
4	The management of odour from the Martinborough WWTP shall be in general accordance with the Odour Management Plan (Schedule 1: Condition 5, Table 2).	✓			Odour Management Plan has been certified by GWRC. WWL states that the MWWTP operates in general accordance with the Odour Management Plan.

	Summary of Conditions Schedule 4: Discharge to Land	Condition met?			Comments
		Yes ✓	No X	N/A	
1	The discharge of treated wastewater to land shall not exceed the following rates: a) Stage 1B Land Treatment: Martinborough WWTP 795 m ³ /day b) Stage 2A and 2B Land Treatment: Pain Farm 4300 m ³ /day	✓			a) Stage 1B Land Treatment: Maximum daily flow was 725 m ³ /day. b) Not applicable.
2	The wastewater hydraulic loading rate shall not exceed the following: a) 35mm depth per week, and no more than 15mm in any 24 hour period during Stage 1B; and b) 21mm depth per week, and no more than 9mm in any 24 hour period during Stage 2A or 2B and only when there is a corresponding soil moisture deficit.		X		a) The 35mm/week limit was exceeded on 36 days; the maximum loading was 64mm/week on 22/03/2023 [non-compliant] . b) Not applicable.
3 ¹⁰	Any treated wastewater discharged shall meet the following standards: a) The concentration of BOD ₅ shall not exceed 60g/m ³ in 9 out of any 12 consecutive monthly test results; b) The concentration of TSS shall not exceed 90g/m ³ in 9 out of any 12 consecutive monthly test results; c) E. coli values shall not exceed 100 cfu per 100 millilitres in more than 5 of 10 consecutive monthly test results; d) The nitrogen loading rate shall not exceed a maximum of 300kg/ha/yr from any source and is to be determined from the average of 12 consecutive monthly test results and the average monthly flow collected in accordance with the Environmental Monitoring Plan (Schedule 1: Condition 5, Table 2) and any applied rates of other sources. Advice Note 1: The standards contained in Condition 1, 2, and 3 above shall apply only until such time as the relevant Discharge to Land Management Plan for Stage 1B, or Stage 2A and/or Stage 2B is prepared by the consent holder and certified by the Manager, Environmental Regulation, Wellington Regional Council. Following certification of the relevant Discharge to Land Management Plan, relevant discharge rate and quality standards shall be those incorporated within the current certified Discharge to Land Management Plan, not the standards and terms contained in Condition 1, 2, and/or 3 above, or any superseded management plan.	✓			During the reporting period discharge to land occurred from October 2022 to April 2023, for varying numbers of days each month. There was only one sampling occasion in which monthly effluent sampling coincided with the discharge of wastewater to land (27 March 2023). Based on that one sample: a) BOD ₅ concentration (41 g/m ³) did not exceed 60 g/m ³ [compliant] . b) TSS concentration (69 g/m ³) did not exceed 90 g/m ³ [compliant] . c) E. coli concentration (42 cfu/100mL) did not exceed 100 cfu/100mL [compliant] . d) Nitrogen loads came only from the treated wastewater. The consent holder has assessed this condition as compliant (138 kg/ha/y), based, on the sum of monthly N-loading. The N-loading rate calculated from the average monthly flow and concentration was also below the limit of 300 kg/ha/y (125 kg/ha/y) [compliant] .

¹⁰ Compliance assessed by Traverse Environmental Ltd

4	The detailed design of the land treatment irrigation proposed for Stage 1B shall be included in the Discharge to Land Management Plan (Schedule 1: Condition 5, Table 2).			N/A	Discharge to Land Management Plan has been reviewed but not certified – detailed design included.
5	Detailed design for Stage 2A and 2B Irrigation shall be included with a revision to the Discharge to Land Discharge Management Plan in accordance with Schedule 1: Condition 12.			N/A	Stage 2A due to commence 2030.
6	<p>The design of the land discharge for Stages 1B, 2A and 2B shall be undertaken to, where practicable, ensure that the discharge of treated wastewater to the land discharge areas shall:</p> <ul style="list-style-type: none"> a) Be evenly distributed to the entire area being utilised for land discharge; b) Not cause runoff or surface ponding; c) Not lead to the development of anaerobic soil conditions; and d) Avoids the discharge of wastewater to land within 125m of the property boundary, except that wastewater may be discharged to land within 25m from the property boundary where: <ul style="list-style-type: none"> (i) Median E. Coli. concentrations are less than 100cfu/100ml; and (ii) Irrigation is at low pressure (less than 1.4 bar); (iii) The irrigation nozzle height does not exceed 1.52m from ground level and does not incorporate an “end gun”; and (iv) Where wind speed does not exceed 12m/s (or 4m/s sustained for a period of 15 minutes or more) in a direction toward an existing dwelling (at the time of commencement of these consents) on an adjoining site within 300m of the irrigation area. 	✓			Previous annual reports have stated that irrigation equipment has been designed in accordance with this condition.
7	The discharge of treated wastewater to the irrigation area shall be in general accordance with the Discharge to Land Management Plan (Schedule 1: Condition 5, Table 2).	✓			The Discharge to Land Management Plan has been reviewed but not certified – discharge operates in accordance with this plan.
8	The Consent Holder shall continuously measure and maintain daily records of wastewater flows entering the Martinborough WWTP and the volume of the treated wastewater discharged the land discharge areas, to record the quantity of material being received and applied.	✓			Flows are recorded every 15 minutes and entered into SCADA.
9	The Consent Holder shall record the location and volume applied to various discrete land discharge areas within the land discharge system.	✓			During Stage 1B the irrigator follows a set path covering 5.6ha and designed to apply to the area evenly, this acts as one discrete area.

10	The Consent Holder shall record crop and pasture management practices across the land discharge areas including: a) Cultivation date; b) Sowing date; c) Fertiliser applications; d) Harvesting; and e) Any other management practices	✓			Records are kept on ID system, also see nutrient balance: - No fertiliser applied. - Mowed and bailed: 21/10/2022, 5/12/2022, 17/01/2023, 5/04/2023.
11	The Consent Holder shall carry out groundwater sampling according to the constituents and frequency specified in the Environmental Monitoring Plan; and samples shall be taken in accordance with the most recent version of Wellington Regional Council's groundwater sampling protocol.	✓			Sampling now reduced to 3 months as per the certified EMP.
12	During Stage 1B, 2A and 2B, the Consent Holder shall undertake soil monitoring in accordance with the Environmental Monitoring Plan during the period of September and October every second year to assess soil health and performance of the land treatment scheme.			N/A	Soil monitoring done 27/09/2021. The next soil monitoring is due Sept/Oct 2023.
13	The findings and results of the monitoring required under Schedule 4: Conditions 8 to 12 shall be incorporated and submitted in the Annual Report (Schedule 1: Condition 26).	✓			All results presented in the annual report.

	Summary of Conditions	Condition met?			Comments
		Yes	No	N/A	
	Schedule 5: Discharge via seepage from the ponds and channel	✓	X		
1	The rate of discharge to land (and subsequently groundwater) from the base and sides of the oxidation and maturation ponds and base and sides of the discharge channel via seepage is for 24 hours per day, 7 days per week, 52 weeks per year.			N/A	
2	The Consent Holder shall: a) Carry out groundwater sampling according to the constituents and frequency in Schedule 6: Table 1, and at locations identified in Schedule 6: Table 2 and Figure 1; and b) Samples shall be taken in accordance with the most recent version of Wellington Regional Council's groundwater sampling protocol.	✓			Compliant.
3	The results of monitoring undertaken in accordance with Schedule 5: Condition 2 shall be incorporated and	✓			All results presented in the annual report.

	submitted in the Annual Report, as required by Schedule 1: Condition 26.				
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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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