



**WHANGANUI
DISTRICT COUNCIL**
Te Kaunihera a Rohe o Whanganui

**TRADE WASTES
BYLAW
2018**

Submission Received

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Submission on Whanganui District Council's proposed Trade Waste Bylaw 2018.

Sustainable Whanganui supports this bylaw although we have a few things we seek assurance on.

Members of Sustainable Trust are keen that the new WDC Waste Treatment Plant be as sustainable and resilient as possible. To do this we know not only does this Treatment Plant need to be able to cope with domestic sewage but also with Trade Waste in an efficient, effective and hygienic manner.

We recognise there needs to be accurate knowledge of industrial discharges that are going to be dealt with. For how can you treat something when you are not exactly sure what it contains or what it's volume, temperature and other qualities are? Monitoring and controlling what is discharged into this plant is a critical primary concern. Therefore we support all the monitoring and control in this proposed bylaw.

The Purpose (Clause 4) for this Plant fits well with our kaupapa of building Whanganui into a more resilient place. Protecting public health, the environment and workers, promoting cleaner production, encouraging waste minimisation and water conservation are principles right out of our objectives. We also strongly support the need to protect the sewage infrastructure and keep it running effectively as well. Complying with resource consent conditions, being able to monitor trade and industrial wastes, sharing the cost fairly between those producing trade and municipal waste are also all necessary parts of making this a fair and compliant bylaw that we support. We feel this is a great way to begin this bylaw.

We understand that the wet industries in Whanganui will continue to produce over 30% of the load of liquid and semi-liquid waste products that this new plant will need to deal with. In addition we know there will be some seasonal variations these industries will have with their waste. We believe this makes it particularly important that the engineers running this plant know what these industries are giving it to deal with and when. Therefore we support this bylaw as it ensures WDC has the right to have the tools to monitor the industrial waste before it comes into the plant.

Whanganui has had enough money spent on getting to this stage in its waste water treatment. We need to ensure this Plant runs efficiently and well for years to come.

We believe this bylaw will allow effective and accurate monitoring 24/7 of all industrial waste being discharged into this WDC Waste Treatment Plant.

Sustainable Whanganui Trust believes that WDC needs all the controls allowed in this document to ensure the criteria for consideration (i.e. industrial waste) can be successfully processed without any problems. Those managing the new WDC Waste Water Treatment Plant need to know what the Plant is going to receive from all significant industries. Part of this is knowing when it will arrive at the plant, what the volume will be, its quality, acidity or alkalinity and its temperature. All this knowledge is important as all could make a difference to individual processes in the Plant.

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We support the 3 grade system of classify trade waste into permitted, conditional and prohibited. These helpful define such things as characteristics, concentrations and different grades of trade waste activities. We believe with 3 grades of trade waste it is clearer which ones are the most problematical to the efficiency of this new plant and which ones need pre-treatment or should be excluded. When communicating these decisions to the applicant WDC will helpfully be required to give statements as to why these decisions were made.

This bylaw also allows those industries receiving Conditional Discharge Permits the right to seek to vary any conditions at any time but also requires a bond or insurance in favour of the Council where failure of industry to comply could result in damage to the Sewage Plant. We support both as fair. We believe these conditions should make WDC decision making clearer and easier for industries to follow.

We understand things can change in industries so it is important to have Clause 17:1 to give the WDC the right to undertake technical reviews. As well Clauses 21, 23, 24 and 26 will allow testing and monitoring to continue throughout the life of all permits allowing checks to be made on a more routine basis.

Back on 11th March 2016, in an Addendum Report to the Hearing Panel of the application for resource consent to discharge screened wastewater from Whanganui into the Tasman Sea the importance of a more detailed Waste Water bylaw was flagged under Tasks 2 and 3. Thus: *“WDC will need a new and updated Trade Waste bylaw to be able to manage trade waste effluent entering the new plant more effective.—. All of the work of Task 2 and 3 will be completed before construction of the plant has been completed.”*

Arno Benadie (Senior Wastewater Engineer) also reported to this Panel that an *“important part – is the creation of new trade waste bylaw and associated sampling and monitoring programmes.”*

Both of these clearly flag the need for such a bylaw and here it is.

We are believe that discussions with Whanganui’s wet industries, restaurants, Chambers of Commerce, septic tank cleaners and other commercial operations about discharges into WDC Waste Water Treatment Plant, that began three years ago, have been part of keeping these commercial groups in the loop.

Although supporting this bylaw we have concerns when comparing it to Wellington City Councils’ (WCC) recently revised Trade Waste Bylaw (2016) mainly in some lack of definitions and have listed these comparison below. We raise these issues below now.

WCC defines ‘Trade waste’ to mean any liquid, with or without matters in suspension or solution, that is or maybe discharged from a trade premises to the wastewater system in the course of any trade, business or industry, or any industrial or commercial process or operation, or in the course of any activity or operation of a like nature; but does not include condensing water or surface water which is discharged directly into a surface-water drain; but may include

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condensing or cooling waters, tankered wastes, stormwater which cannot be practically separated, or domestic wastewater
WDC Trade waste is defined as “any liquid that is or may be discharged from a trade premises or tanker to the Council’s sewerage system of a non-domestic nature.”

We ask should WDC bylaw have better defined definitions in their clauses ?
Or is there a reason for leaving them out ?

We also note that Wellington’s bylaw allows only 15 working-days notice to consent holders if they are deemed to have breached their conditions whereas WDC proposed bylaw allows 20 (Clause 20). We question why Whanganui industry would need an extra 5 days grace ? (Although we recognise the right to discharge to the Plant can stop sooner for Conditional users. 29.2)

We also have not found a clause stipulating that transferred consents to another operator can only occur with permission from WDC. Or on stipulating that WDC has the right to remove or alter any work or things constructed in breach of this or nay other bylaws the right to recover costs for this.
We would like to be assured these are somewhere here.

This said we support this bylaw intensions and the clarity it gives and believe it will be a fair and effective system of control and we wish the new Waste Water Treatment Plant well. Having this bylaw in place will give the WDC the regulations necessary to ensure the on going viability of the new WDC Waste Water Plant and for it to run as an efficient and effective Waste Water Plant. This should give WDC the ability to protect the on going efficiency of Whanganui’s most expensive infrastructure.

We appreciated it takes time and effort to get the science and all the wording to be exact in such a document. So congratulate to WDC for coming up with a clear bylaw that can be understood by all who have to deal with discharges at one or other end of this continuing waste process.

And above all we welcome this being the end to discharges into the sea which are only milliscreened.

We wish to be heard at the hearing.

Lyn Pearson

on behalf of **Sustainable Whanganui Trust,**

83 Maria Place,

Whanganui, 4500.

sustainablewhanganui@gmail.com

sustainablewhanganui.org.nz