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Supplementary agenda for a hearing by the Policy & Regulatory Committee (to hear and consider submissions and make recommendations on the Trade Waste and Wastewater Bylaw) to be held in Council Chambers, District Office, 15 Galileo Street, Ngaruawahia on **WEDNESDAY, 22 FEBRUARY 2023** commencing at **1:00pm**.

*It is noted that the main agenda was distributed on Friday, 17 February 2023 – this is a supplementary agenda with the reports indicated on the original agenda as being under separate cover*

**4. SUPPLEMENTARY REPORTS**

4.2 Updated Attachment 2 – Trade Waste and Wastewater Bylaw (All Submissions) 2

GJ Ion  
**CHIEF EXECUTIVE**

ATTACHMENT 2: ALL SUBMISSIONS

## **Submission Forms - Trade Waste and Wastewater Bylaw**

**Project:** Proposed Trade Waste and Wastewater Bylaw

**Q1 First Name**

Short Text Mark laurenson

**Q2 Last Name**

Short Text 4Sight consulting

**Q3 Entity you are submitting on behalf of**

Short Text Z Energy Ltd, Mobil Oil NZ, BP Oil NZ

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice I do not have a response for this section

**Q8 Please tell us why, why not?**

Long Text .

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice In part

**Q10 Please tell us why, why not?**

Long Text See long submission. Amendments are suggested to the Bylaw as follows:  
RELIEF SOUGHT

12. Reflecting the rationale above, the following specific amendments are sought to the proposed bylaw:

- Remove the 5m<sup>3</sup> maximum daily total flow limit per Table 1 of Schedule 1A, or increase it to 10m<sup>3</sup>, for car wash discharges, noting full detail of operation and maintenance will still need to be provided via the permitted pathway.
- Add an additional item to 8.6b to require Council to include specific reference to monitoring data demonstrating the performance of proprietary treatment devices to manage a particular trade waste stream.
- Amend 8.7a)vii. as follows to ensure that the sampling regime is both reasonable and proportionate to the purpose of the bylaw (additions in underline):  
vii. The provision and maintenance of a reasonable and proportionate sampling, analysis and testing programme and flow measurement, at the Consent Holder's expense;

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice I don't have a response for this section

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text

**SUBMISSION TO WAIKATO DISTRICT COUNCIL PROPOSED TRADE WASTE AND WASTEWATER  
BYLAW**

**To:** Waikato District Council  
Private Bag 544  
Ngāruawāhia 3742

Via email: [consult@waidc.govt.nz](mailto:consult@waidc.govt.nz)

**Submitter:** Z Energy Limited<sup>1</sup>  
PO Box 2091  
**WELLINGTON 6140**

bp Oil New Zealand Limited  
PO Box 99 873  
**AUCKLAND 1149**

Mobil Oil NZ Limited  
PO Box 1709  
**AUCKLAND 1140**

*Hereafter, collectively referred to as the Fuel Companies*

**Address for Service:** 4Sight Consulting Limited  
PO Box 911 310  
Victoria Street West  
**Auckland Central 1142**

Attention: Mark Laurensen

Phone: xxx Email: xx

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<sup>1</sup> On behalf of the wider Z Group, including the Z and Caltex operations in New Zealand.

## **INTRODUCTION**

1. Waikato District Council (*Council*) is seeking submissions on its proposed Trade Waste and Wastewater Bylaw (*the proposed bylaw*). Council proposes that the proposed bylaw will replace the Waikato District Council Trade Waste and Wastewater Bylaw 2016 (*the operative bylaw*).
2. The Fuel Companies receive, store, and distribute refined petroleum products around New Zealand. The core business of the Fuel Companies in Waikato District relates to the storage and distribution of petroleum products and operation of retail fuel outlets, including service stations and truck stops. The Fuel Companies' interest in the proposed bylaw addressed in this submission relate to trade waste and in particular how it addresses discharges from car washes. It draws on the experience of the Fuel Companies operating under a range of trade waste bylaws around the country.
3. The Fuel Companies do not wish to be heard in relation to this submission.

## **PROPOSED BYLAW**

4. Council has prepared a Statement of Proposal which sets out the changes from the operative bylaw. The track changes version of the operative bylaw highlights additional changes. The nature of the changes proposed are limited and the Fuel Companies are neutral to them.
5. No substantive changes from the operative to the proposed bylaw are proposed for the classifications for trade waste discharges, which are either permitted, conditional, or prohibited. Where permitted, an approval notice must be obtained. As set out by the Fuel Companies in detail in response to the operative bylaw as proposed in 2016, the Fuel Companies do not support the requirement for approval notices where discharges are permitted. The Fuel Companies remain of the view that alternative approaches would be more efficient in relation to permitted discharges, for instance notification requirements and auditing at an industry level, rather than requiring approvals for all permitted trade waste discharges. More detailed rationale in this regard was set out in 2016 and is not repeated here, recognising the narrow focus of Council's review and the low likelihood of the above being revisited in this review cycle. Rather, what is set out below is the Fuel Companies' experience with similar regimes, particularly in the Waikato Region, and relief to seek to address the same.

## **THE FUEL COMPANIES' EXPERIENCE**

6. The Fuel Companies are experiencing increased requirements to monitor trade waste discharges from car wash facilities irrespective of demonstrated compliance with water quality parameters and that the purpose of bylaws would be better achieved by focusing on ensuring proprietary devices are appropriately operated and maintained. This is most apparent with respect of conditional discharges, for instance where discharges exceed permitted volumes, but can occur in relation to permitted discharges. The Fuel Companies consistently seek to ensure that monitoring requirements recognise

the proven performance of appropriately managed proprietary devices. To understand this position, further detail regarding discharges from car wash facilities is addressed below.

7. Discharges from modern car wash facilities include both pre-treatment and water recycling. This typically includes sumps that provide initial settlement of coarse sediments and proprietary oil/grit interceptor to reduce both suspended solids and hydrocarbons. Typically, 65-90% of wastewater is recycled for reuse within the car wash, with the remainder discharged to trade waste.
8. These devices enable the Fuel Companies to comply with the requirements of Schedule 1A subject to appropriate operation and maintenance, which is addressed via robust procedures, for instance the Trade Waste Management Plan operated by bp which is attached to provide an example of how these discharges are managed by the Fuel Companies. Comprehensive monitoring records over an extended period support the same.
9. This data is reflected in the bp Trade Waste Management Plan which summarises 11 years of sampling undertaken across the bp Connect carwash network. The data is summarised at Table 3 of the bp Management Plan, which is included below for completeness, with further detail provided at Appendix E of the attached Trade Waste Management Plan. It demonstrates the quality of water discharged and shows no exceedances of typical trade waste limits.

**Table 3: bp carwash water quality sampling (TPH, pH, TSS) summary 2010-2022**

	<b>TPH g/m3</b>	<b>pH</b>	<b>TSS g/m3</b>
<b>Compliance limits*</b>	<b>50</b>	<b>6.0-9.0</b>	<b>600</b>
Average	9.20	6.97	38.46
Min	0.5	6.2	6.1
Max	48	8.0	83.0
Exceedances	0	0	0
# Sites	39	39	5
# Samples	163	157	37

**Notes:**

TPH = Total Petroleum Hydrocarbons

TSS = Total Suspended Solids

\* Compliance limits are based on Hamilton City Council trade waste consent thresholds

10. With the benefit of long running compliance records, the Fuel Companies consider the quality of car wash discharges managed via proven proprietary devices and management plans are well understood and this should be reflected in approaches to classification and monitoring of the same. Doing so will provide for effective and efficient management of the network and better meet the current and future needs of the community.
11. Further, the Fuel Companies also consistently seek that councils reconsider the model 5m<sup>3</sup> permitted volume limit, at least in the context of car wash discharges. This reflects that discharge volumes from car wash facilities operated by the Fuel Companies typically fall between 3m<sup>3</sup> and 10m<sup>3</sup> (with instantaneous discharge rates less than 2 litres per second), that volume is not determinative of

quality or risk, discharge quality is consistent, and that costs associated with volume can be appropriately addressed via metering.

**RELIEF SOUGHT**

12. Reflecting the rationale above, the following specific amendments are sought to the proposed bylaw:

- Remove the 5m<sup>3</sup> maximum daily total flow limit per Table 1 of Schedule 1A, or increase it to 10m<sup>3</sup>, for car wash discharges, noting full detail of operation and maintenance will still need to be provided via the permitted pathway.
- Add an additional item to 8.6b to require Council to include specific reference to monitoring data demonstrating the performance of proprietary treatment devices to manage a particular trade waste stream.
- Amend 8.7a)vii. as follows to ensure that the sampling regime is both reasonable and proportionate to the purpose of the bylaw (additions in underline):

*vii. The provision and maintenance of a reasonable and proportionate sampling, analysis and testing programme and flow measurement, at the Consent Holder's expense;*

Signed on and behalf of Z Energy Limited, bp Oil New Zealand Limited, and Mobil Oil New Zealand Limited



.....  
Mark Laurensen  
Principal Planner

**22 November 2022**

**Encl: Annexure 1:** bp Trade Waste Management Plan

Response No:  
2

Contribution ID: 5782  
Member ID: 47  
Date Submitted: Nov 30, 2022, 09:15 AM

8

**Q1 First Name**

Short Text Haydn

**Q2 Last Name**

Short Text Solomon

**Q3 Entity you are submitting on behalf of**

Short Text Ngati Naho Trust

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice Yes

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice Yes

**Q8 Please tell us why, why not?**

Long Text See long submission attached

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice Yes

**Q10 Please tell us why, why not?**

Long Text See long Submission attached

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice Yes

**Q12 Please tell us why, why not?**

Long Text For the Ng?ti Naho Trust mortuary waste are still remnants of the human body and as such ought NOT be exposed to let alone mixed with effluent or wastewater under any circumstances.

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text No

**Q14 Please upload any additional information here**

File Upload [https://shape.waikatodistrict.govt.nz/download\\_file/1342](https://shape.waikatodistrict.govt.nz/download_file/1342)



**For internal use only:**

ECM project # .....

ECM no. # .....

Submission # .....

Customer # .....

Property # .....

# Trade Waste and Wastewater Bylaw

Submission form (please provide feedback by **21 November 2022**)

**Name/Organisation** Haydn Solomon, CEO Ngāti Naho Trust

**Physical address** xxxx

**Postal address** As above

**Postcode** 2474

**Email** xxxx

**A hearing will be held in February 2023. Would you like to present your submission to Council at the hearing?**

Yes

No  If yes, please provide a contact phone number xxxx

**Do you support the proposed changes to the Wastewater section of the Bylaw?**

Yes

No

I do not have a response for this section

If Yes or No, please tell us why/why not?

Notwithstanding our recommendations below, I acknowledge the work and effort by WDC to make a number of positive and effective changes regarding the proposed Bylaw for Wastewater and Trade Waste discharge into the Waikato River.

The wastewater section of the draft Bylaw focusses on reticulation and customer connection for domestic wastewater for the following rationale:

- a) To provide for Te Ture Whaimana (the vision and strategy for the Waikato River)
- b) To provide for WDC's vision for a healthy Waikato River.
- c) To provide clarity on the wastewater connection process.
- d) To prevent damage to infrastructure
- e) To address asset damage liability

At a prima facie level I fully support the rationale given for the draft Bylaw regarding domestic wastewater reticulation and customer connection. On a practical level there are compelling grounds and rationale for the proposed Bylaw. However, at a more in-depth level I disagree with the ability of the proposed Bylaw to deliver the outcomes necessary to achieve the rationale above from points a) – e). For example, it lacks veracity, clarity and intent regarding points a) and b) above. Whilst its stated in legislation there is discretion for the draft Bylaw to excel beyond the legislation and not just meet the legal requirement Therefore, we make the following recommendations:

## Recommendation(s)

THAT **point a)** above be refined in terms of clause 1.2 where it states WDC has a duty under Section 17 of the Waikato River Settlement Act 2010, to have particular regard to Te Ture Whaimana o Te Awa o Waikato. The wording is too loose and lacks inherent commitment. Not to be pedantic but wording in a legal framework is absolutely critical. As a suggestion the wording ought to be replaced with more decisive and affirmative wording such as “**shall adhere and uphold**” to the vision of Te Ture Whaimana o Te Awa o Waikato. NOT “have particular regard” to the vision of Te Ture Whaimana o Te Awa o Waikato. Therefore, WDC is equipped to do more than just “recognize” the special cultural, social, environmental and economic relationship of Waikato-Tainui with the Waikato River and the need to protect and restore the Waikato River. It actually commits WDC to take a more substantive stance and action in partnership with Waikato Tainui to protect and restore the special cultural, social, environmental and economic relationship of Waikato Tainui and WDC with the Waikato River.

In terms of **point b)** I am not aware of what exactly is WDC’s vision for a healthy Waikato River. What is WDC’s premise and definition for a healthy Waikato River? How was this vision designed? How will it be implemented? I can only assume it is based on Vision and Strategy for the Waikato River as defined by the Waikato River Settlement Act 2020. If this is the case then there is a need for WDC and Waikato Tainui via its JMA Committee and Māori Caucus to refine the application of clause 4.1e) where it states – “The Waikato River Settlement Act 2010, in particular, the requirement that Council have regard to the Vision and Strategy for the Waikato River by contributing to the protection and restoration of the health and wellbeing of the Waikato River” there is a need to define what is meant by ‘health’ and ‘wellbeing’ when it comes to the Waikato River so there are actual defined measures that correlate to the health and wellbeing of the Waikato River. Furthermore, that those defined measures actually align to a Te Ao Māori.

THAT Mana Whenua are engaged to provide a Mātauranga Māori assessment tool to define the health and wellbeing of the Waikato River. AND THAT, the Mana Whenua are given the opportunity to exercise their Mana Whakahaere to implement the execution and delivery of their Mātauranga Māori assessment tool jointly with WDC. For example, for Ngāti Naho the basis of our definition for the health and wellbeing of the Waikato River is defined by the Tongikura of King Tāwhiao when he placed Te Pou o Mangatāwhiri in order to “Protect the mauri and mana of the Waikato river and her people!”

The above provides a baseline for our Mātauranga Māori framework for our Taiao otherwise known as ‘Pou Taiao’. In terms of WDC’s vision for connected and thriving communities we are open to working jointly with WDC to align to a Te Ao Maori framework and to deliver better health and wellbeing outcomes for our Waikato River.

THAT in lieu of a Mātauranga Māori assessment tool provided by Mana Whenua that WDC adopt the Mātauranga Māori Assessment Tool known as Wai Ora / Wai Māori as a universal Kaupapa Māori framework be incorporated by Waikato District Council to monitor and assess the health of the Waikato River in order to align with Te Ao Māori. (note, this assessment tool was co-designed by a person of Waikato Tainui descent for the Waikato River in terms of freshwater management based on a Kaupapa Māori framework). For reference please refer to link below –

<https://www.landcareresearch.co.nz/assets/Publications/Policy-Briefing-Guidance-Papers/Policy-Brief-19-Wai-Ora-Wai-Maori.pdf>

**Do you support the proposed changes to the Trade Waste section of the Bylaw?**

Yes

No

I do not have a response for this section

If Yes or No, please tell us why/why not?

The Trade Waste section of the proposed Bylaw focusses on the permit process, the contaminants and volumes discharged from businesses and trade premises and industry for the following rationale below including revised amendments underlined namely -

- f) To align with Te Ao Māori when disposing of mortuary waste.

In general we are supportive of the majority of the proposed changes to the Bylaw with the addition of minor changes and or amendments we believe will help to enhance the proposed Bylaw. Therefore, to support the implementation and delivery of point f) above, we suggest the following recommendations:

**Recommendation(s):**

THAT point f) above be revised to include the following in bold and underlined wording - To align with Te Ao Māori when disposing of mortuary waste **including ALL trade waste discharged from businesses and trade premises and industry.**

THAT Schedule 1b "Prohibited Characteristics" be revised to include an Alignment with Te Ao Māori. For example, "Any discharge has prohibited Characteristics if it has any solid, liquid or gaseous matters, or any combination, or mixture of such matters which by themselves or in combination with any other matters will immediately or in the course of time: insert - **g) negatively affect the Mauri and Mana of the Waikato River including its tributaries and waterways.**

THAT clause 8.2 Discharge of Trade Waste be amended by striking out the following wording as follows –

a) No Person may discharge or cause to be discharged Trade Waste into the Wastewater System ~~except in accordance with approval from Council (either through an Approval Notice, Conditional Consent or a Trade Waste Agreement).~~

There must be a zero tolerance approach to the discharge of Trade Waste into the Wastewater System. The previous wording provides an exception which would vicariously allow the discharge of mortuary waste into the Waikato River.

THAT clause 8.4 d) regarding Trade Waste Agreement be amended with the following underlined wording – A Trade Waste Agreement may be appropriate in circumstances where and in the reasonable opinion of Council, the discharge is considered to have:

- i. Unique discharge Characteristics;
- ii. A volume or loading of any Characteristic that may affect the operation of the Wastewater System or Treatment Plant;
- iii. Potential discharge of hazardous or prohibited substances;
- iv. Pre-Treatment systems;
- v. The requirement for capacity to be reserved at the Wastewater Treatment Plant;
- vi. A history of non-compliance with a Consent or Trade Waste Agreement.
- vii. Any other matter Council may consider relevant.
- viii. **Aligned to a Te Ao Māori framework**

THAT clause 8.5 a) regarding – ‘Application for a Conditional Consent or Variation of Consent’ that a) ii, be amended to include the underlined wording below:

a) Every Person who does, proposes to, or is likely to: ii. Vary the Characteristics of a Permitted Trade Waste discharge in a manner which may cause it to fail to meet the standards for a Permitted Trade Waste and alignment to Te Ao Māori

THAT a Ngāti Naho Mātauranga Māori assessment tool known as ‘Pou Taiao’ be utilized when monitoring, testing and evaluating the health and wellbeing of the Waikato River including the prevention of trade waste from industry, businesses and trade premises into the Waikato River.

THAT in lieu of a Mātauranga Māori assessment tool provided by Mana Whenua anywhere on the Waikato River that WDC adopt the Mātauranga Māori Assessment Tool known as Wai Ora / Wai Māori as a universal Kaupapa Māori framework be incorporated by Waikato District Council to monitor and assess the health of the Waikato River in order to align with Te Ao Māori regarding the prevention of trade waste discharge into the Waikato River.

**Do you support the proposal to separate mortuary waste from the public wastewater system?**

Yes

No

I do not have a response for this section

If Yes or No, please tell us why/why not?

For the Ngāti Naho Trust mortuary waste are still remnants of the human body and as such ought NOT be exposed to let alone mixed with effluent or wastewater under any circumstances.

**Do you have any additional comment regarding the proposed Trade Waste and Wastewater Bylaw?**

No.

**Prefer to do it online?**

You can complete the submission form online at [www.waikatodistrict.govt.nz/sayit](http://www.waikatodistrict.govt.nz/sayit)

**Need more information**

For more information, visit our website [www.waikatodistrict.govt.nz](http://www.waikatodistrict.govt.nz)

**Privacy statement**

The contents of your submission (not including your address and contact details) will be made public through Council agendas and as a result will be published on our website. If you would like your name also kept confidential, please let us know on your submission form.

**Q1 First Name**

Short Text Vanesha

**Q2 Last Name**

Short Text Waters

**Q3 Entity you are submitting on behalf of**

Short Text Apart of Waikato IWI

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice Yes

**Q8 Please tell us why, why not?**

Long Text Just want to have clean water throughout our land for a CLEAN GREEN AOTEAROA & For the baby's of the FUTURE!!

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice Yes

**Q10 Please tell us why, why not?**

Long Text To protect the health & safety of our people!

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice Yes

**Q12 Please tell us why, why not?**

Long Text For the same reason the HEALTH & SAFETY OF OUR PEOPLE! Surely there's another way this waste can be dealt with instead of letting it run into our water ways/Waikato River

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text

**Q14 Please upload any additional information here**

File Upload

**Q1 First Name**

Short Text Rangatira

**Q2 Last Name**

Short Text Simon

**Q3 Entity you are submitting on behalf of**

Short Text Tuurangawaewae Marae

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice In part

**Q8 Please tell us why, why not?**

Long Text I support the proposed change to provide for Te Ture Whaimana (the vision and strategy for the Waikato River). Waikato District Council have an obligation to "further" the protection, restoration and the health and wellbeing of the Waikato River.

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice In part

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice Yes

**Q12 Please tell us why, why not?**

Long Text I support the proposal to separate Mortuary Waste from the public stormwater system, and the Te Ao M?ori view of disposing mortuary waste to land and not the Waikato River, "which comes from Papatuanuku should return to Papatuanuku". This proposal also aligns with the NPS-FM and Te mana o te wai which expresses T?ngata Whenua values for freshwater. T?ngata Whenua should also determine how and where mortuary waste would be disposed of.

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text

**Q14 Please upload any additional information here**

File Upload

**Q1 First Name**

Short Text Bryce

**Q2 Last Name**

Short Text Mounsey

**Q3 Entity you are submitting on behalf of**

Short Text Haven Funeral Services Limited

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice Yes

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice In part

**Q8 Please tell us why, why not?**

Long Text Largely the proposed changes seem commonsense and will be a matter of education for the public

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice I don't have a response to this question

**Q10 Please tell us why, why not?**

Long Text Not enough information given to comment on

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice No

**Q12 Please tell us why, why not?**

Long Text We believe there is no difference to mortuary waste then there is from the general population that contribute to the waste system on a daily basis ie we remove bodily fluids/solids which is no different to a living person going about their daily toileting needs ie urinating, bowel motions and women's period discharge. The embalming fluids we use are environmentally friendly and the quantities are minimal per case. It is important to know that not all deceased persons are embalmed. If this is proceeded with, it will automatically increase the cost to what is already perceived as an expensive service and not affordable to many in our local community, many of whom do not make provision for their passing. Instigating this change to our existing premises would also be challenging given the age and layout of the buildings.

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text Any changes proposed need to be balanced and based on factual information and sound principles.

**Q14 Please upload any additional information here**

File Upload

**Q1 First Name**

Short Text Jamie

**Q2 Last Name**

Short Text Toko

**Q3 Entity you are submitting on behalf of**

Short Text Sincere Funeral Home Ngaruawahia

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice Yes

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice In part

**Q8 Please tell us why, why not?**

Long Text Yes in part. Please see my submission on Mortuary Waste below.

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice Yes

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice In part

**Q12 Please tell us why, why not?**

Long Text I would like to know where this designated land will be. Being Maori I understand the reasoning why there needs to be change. However, mortuary fluids are as tapu as the tupapaku itself, the designated land would have to be as similar or if not a cemetery itself. Have these important matters been considered. Will there be permits and cost on the funeral home for the disposal of the fluids and who or how will they be stored and removed from the funeral home. Will there be a cultural process, karakia each time mortuary fluid is disposed of. Who will perform these brief ceremonies. Will there be objections from other cultures, ethnicities or Europeans. Will there be a separation of mortuary fluids as a result of someone objecting to their loved ones fluid being laid in amongst other deceased fluids. As you can see there are a number of concerns that must be taken into account. Although there are fewer funeral homes in the Waikato catchment as there are in the main cities. Every option would need to be explored and a co-designed policy with Iwi and Hapu would be paramount in my opinion.

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text Apart from my submission, I am happy with the new clauses regarding the Trade Waste.



Response No:  
7

Contribution ID: 5147

17

Member ID:

Date Submitted: Nov 18, 2022, 01:30 PM

**Q1 First Name**

Short Text Ronel

**Q2 Last Name**

Short Text Jacobs

**Q3 Entity you are submitting on behalf of**

Short Text

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice In part

**Q8 Please tell us why, why not?**

Long Text If it causes any water rates to be increased for ratepayers, I do not support this and an alternative proposal will need to be made. If it decreases water rates, I support this.

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice In part

**Q10 Please tell us why, why not?**

Long Text If it causes any water rates to be increased for ratepayers, I do not support this and an alternative proposal will need to be made. If it decreases water rates, I support this.

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice In part

**Q12 Please tell us why, why not?**

Long Text If it causes any water rates to be increased for ratepayers, I do not support this and an alternative proposal will need to be made. If it decreases water rates, I support this.

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text

**Q14 Please upload any additional information here**

File Upload

**Q1 First Name**

Short Text Katrina

**Q2 Last Name**

Short Text Andrews

**Q3 Entity you are submitting on behalf of**

Short Text Waikato Regional Council

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice Yes

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice In part

**Q8 Please tell us why, why not?**

Long Text See Below

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice In part

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice In part

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text Submission from Waikato Regional Council on the Waikato District Council Proposed Trade Waste and Wastewater Bylaw

Introduction

1. Waikato Regional Council (WRC) appreciates the opportunity to make a submission to the Waikato District Council Proposed Trade Waste and Wastewater Bylaw.
2. Our feedback relates to proposed changes to the wastewater and trade waste disposal provisions, as well as monitoring and enforcement to support the management of discharges in a manner that protects from adverse environmental effects.
3. The proposed bylaw sets clear expectations for the management of wastewater and trade waste within the Waikato district. We support appropriate resourcing for monitoring and enforcement activities that will achieve effective implementation of the bylaw.
4. We support the recognition of Te Ture Whaimana o Te Awa o Waikato, the Vision and Strategy for the Waikato River, within the Introduction and Purpose sections of the proposed bylaw. It is important that waste discharges are managed to support the restoration and protection of the health and wellbeing of the Waikato River. We support any outcomes of the bylaw that contribute to the Vision and Strategy objective of net improvement.

5. We highlight the importance of aligning this bylaw with the existing Waikato District Council Stormwater Bylaw 2021, which manages the entry of contaminants into the stormwater system to protect the receiving environment.

#### Wastewater

6. We support the provisions to prevent inflow and infiltration of stormwater into the wastewater system.

7. We support Clause 7.8 relating to prohibited discharges and associated Schedule 1B of the proposed bylaw. However, we ask that Waikato District Council (WDC) considers how compliance with this clause will be monitored and what deterrents will be used to discourage non-compliance, particularly in relation to the day-to-day activities of communities discharging to the wastewater system.

8. We highlight the importance of education programmes reminding new and existing users of prohibited discharges to support the practical implementation of the bylaw. We understand that punitive actions are limited under local government bylaws so education programmes can be an effective tool to influence appropriate behaviour.

#### Trade Waste

9. We support the provisions relating to tankered waste.

10. We understand WDC's reasoning for proposing to exclude mortuary waste from the public wastewater network. However, we would like more clarity on what facilities are likely to be designated for mortuary waste disposal, as we are conscious there are limited landfills within the Waikato region.

11. We recommend that authorised (consented) sites and facilities for disposal of mortuary waste are identified and made known to the relevant industries.

Doc # 25094126 Page 3

12. We suggest the definition of "Mortuary Waste Disposal Site" be expanded on to provide clarity around how these sites will be designated and where users can find information about them.

#### Monitoring and Enforcement

13. WRC supports appropriate resourcing for the monitoring and enforcement activities required to achieve effective implementation of the bylaw.

14. We acknowledge the limited enforcement options available to WDC under the Local Government Act 2002 but encourage that any other tools or deterrents available to WDC to promote compliance with the bylaw be provided for and utilised.

**Q14** [Please upload any additional information here](#)

File Upload

**Q1 First Name**

Short Text xx

**Q2 Last Name**

Short Text xx

**Q3 Entity you are submitting on behalf of**

Short Text xx

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice No

**Q8 Please tell us why, why not?**

Long Text I do not understand why it would be culturally insensitive to be released into the ocean. I have never heard that before. It seems more disgusting to hold it in vats/tanks to me. Who will have access to these vats and how will the remains ever break down properly in vats!? Burial is the proper way - in the ground (with all their parts) and all Maori know that this is their way.

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice No

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice No

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text Bury humans in the ground within one month - including any 'bits' that may have had to be removed. This is the best way. This would avoid the issue that you have created.  
\*\*\*\*\*Please keep my name confidential.\*\*\*\*\*

**Q14 Please upload any additional information here**

File Upload

**Q1 First Name**

Short Text Tukukino

**Q2 Last Name**

Short Text George

**Q3 Entity you are submitting on behalf of**

Short Text Taupiri marae

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice Yes

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice In part

**Q8 Please tell us why, why not?**

Long Text There has been an ongoing issue from our marae around trade waste and the quality of the water from morgues and freezing works as the waste and water from there is regarded as tapu! We swim in the same water they use to kill animals and treat dead bodies witch means we're drinking that if we are pumping from the river!  
Also run off from roads such as storm water and the particles taken from streets and town roads being drained straight into the water ways directly

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice In part

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice In part

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text I think a conversation about how to mitigate against some big issues ie wai tapu can be wonderful moving forward

**Q14 Please upload any additional information here**

File Upload

Response No:  
11

Contribution ID: 5015

22

Member ID:

Date Submitted: Nov 10, 2022, 02:16 PM

**Q1 First Name**

Short Text Angela

**Q2 Last Name**

Short Text Yerkovich

**Q3 Entity you are submitting on behalf of**

Short Text

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice Yes

**Q8 Please tell us why, why not?**

Long Text It is important to ensure that facilities for wastewater are installed correctly, and council is aware of what is being done.

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice Yes

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice Yes

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text I am very happy to see a response to M?ori ways of knowing, being and doing.

**Q14 Please upload any additional information here**

File Upload

Response No:  
12

Contribution ID: 4771

23

Member ID:

Date Submitted: Oct 17, 2022, 07:49 PM

**Q1 First Name**

Short Text Emily

**Q2 Last Name**

Short Text Puhi

**Q3 Entity you are submitting on behalf of**

Short Text

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice Yes

**Q8 Please tell us why, why not?**

Long Text Why not

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice Yes

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice Yes

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text This is unbelievable. I don't understand why it hasn't been done all those years ago. Eewww

**Q14 Please upload any additional information here**

File Upload

Response No:  
13

Contribution ID: 4738

24

Member ID:

Date Submitted: Oct 02, 2022, 10:29 AM

**Q1 First Name**

Short Text Colin

**Q2 Last Name**

Short Text Sherrard

**Q3 Entity you are submitting on behalf of**

Short Text Private

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice No

**Q8 Please tell us why, why not?**

Long Text Added cost to businesses

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice No

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice No

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text Added cost to all concerned

**Q14 Please upload any additional information here**

File Upload



**Q1 First Name**

Short Text Denise

**Q2 Last Name**

Short Text Reynolds

**Q3 Entity you are submitting on behalf of**

Short Text Me

**Q4 Email Address**

Email xx

**Q5 Phone Number**

Telephone xx

**Q6 Would you like to present your submission at the hearing?**

Multi Choice No

**Q7 Do you support the proposed changes to the Wastewater section of the Bylaw?**

Multi Choice Yes

**Q8 Please tell us why, why not?**

Long Text Ae, he tika, he pono ki te tikanga.

**Q9 Do you support the Trade Waste section of the Bylaw?**

Multi Choice Yes

**Q10 Please tell us why, why not?**

Long Text

**Q11 Do you support the proposal to separate Mortuary waste from the public wastewater system?**

Multi Choice Yes

**Q12 Please tell us why, why not?**

Long Text

**Q13 Do you have any additional comment regarding the Trade Waste and Wastewater Bylaw?**

Long Text He tika mau.

**Q14 Please upload any additional information here**

File Upload