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Tēna koē

## Re: proposed wastewater environmental performance standards

Thank you for the opportunity to submit on the proposed wastewater environmental performance standards (the standards). This submission reflects the views of Engineering New Zealand. Engineering New Zealand represents over 23,000 engineers, including engineers working in the water services sector.

Engineering New Zealand strongly supports the concept of a wastewater environmental performance standard. We are proponents of standardisation wherever it makes sense to do so- particularly in repeatable infrastructure like wastewater treatment plants. A standard approach helps provide certainty and efficiency in the wastewater system. Environmental impacts of wastewater discharges need to be managed in a consistent and transparent way across the country. It is important that our wastewater network provides this critical service without detrimentally impacting our environment, particularly our waterways, or risk public health.

### The proposed standards do not go far enough to mitigate environmental impacts

The *Our Environment report 2025* shows that New Zealand's environmental indicators are largely behind where we would want them to be. This is particularly true for our waterways- where 45 percent of the country's total river length was not suitable for activities such as swimming between 2016 and 2020, and 55 percent of New Zealand's river length indicate conditions with moderate or severe organic pollution or nutrient enrichment.

New Zealand needs strong, sensible environmental protections to safeguard our natural environment. Therefore, environmental considerations should be at the forefront of the standards. Engineering New Zealand has concerns that the standards do not go far enough to protect the environment and may in fact contribute to further degradation. At a high level we have concerns that the standards make it easier to discharge to water rather than land, when it should be the other way around. Additionally, the standards may disincentivise the upgrade of many wastewater treatment plants that are needed.

### Support for the Water New Zealand submission

We endorse the submission from Water New Zealand. Their submission covers concerns, opportunities and recommendations for the standards in significant detail and has been formulated with support from experts in the water sector. The detailed technical recommendations they provide on the standards would greatly improve the performance of NZ's wastewater system. Engineering New Zealand wishes to highlight the following points from the Water New Zealand submission:

- Comments on the challenges with existing arrangements and the need for improved monitoring and enforcement of consent compliance.
- Support for a 35-year consent to provide certainty but with the inclusion of review clauses to provide an opportunity to reflect change in practice and technology. Long consents must be flexible enough to adapt to potential disruptions (ie. climate change) and significant changes in practice.

- Concerns that the standards do not appear to be informed by scientific evidence or international best practice.
  - The recommendations made in this area are common sense and should improve system without exponentially increasing costs.
  - Engineering New Zealand supports the recommendation that the proposed standards should apply to the whole wastewater network (including existing treatment plans and upgrades), and all related contaminants and effects from discharges.
- Confusion and potential misalignment with other regulatory reform programmes (ie. Local Water Done Well and RMA reform).
  - An example is that the standards seem to be misaligned to the agreed community level of service proposed under the Local Government Water Services Bill or the Local Government Act 2002. Additionally, the standards may not meet the consultation expectations of the Commerce Commission.
  - The timing of the standards is confusing with RMA overhaul and expected review of national direction tools. It would be more effective to introduce the standards once the outcome of key government reforms is known.
- Concerns and recommendations raised around environmental protections. We are concerned there is no incentive in the Standards for maintaining, monitoring or improving waterbodies health to be included in consent conditions.
  - The standards do not have consideration of the current state of the receiving environment and may contribute to further degradation in some places.
  - The standards should not enable degradation of existing water quality and life supporting capacity. Rather, they should require continual improvement in environmental performance.
  - We support the recommendation to require monthly moving average, 95th percentile and maximum allowable limits for key parameters of concern.
- The standards have an absence of Te Ao Māori, tikanga Māori and Mātauranga Māori. Waterways are a taonga and Māori have considerable expertise as kaitiaki of New Zealand's waterways.
  - We strongly support Water New Zealand's recommendations on the need to provide greater recognition for the role of iwi-hapu and the cultural value of water to Māori in the standards.

## Conclusion

Engineering New Zealand is supportive of standardisation and believes that clear and robust wastewater standards have been needed for a long time. New Zealand needs to have a wastewater system that is well monitored to understand environmental impacts and is well planned to ensure there is the capacity to meet the demands of future growth and not increase public health risks. The standards would go some way to improving the quality and efficiency of New Zealand's wastewater network. However, the standards would benefit from better consideration of scientific evidence, robust environmental protections and better alignment with related government reform programme.

Thank you for the opportunity to submit on the proposed wastewater environmental performance standards. Please do not hesitate to contact us if you have any questions.

Nakū, nā



**Dr Richard Templer**  
Chief Executive