

Site Compliance Report

Site No: REG602801
Site Owner: Waikato District Council
Site Name: Huntly WWTP : McVie Rd, Huntly
Date: 6 December 2021

1 INTRODUCTION

The following resource consents are held for the site:

Resource Consent	Status	Description	Commenced	Expiry
AUTH119647.01.02	Current	Discharge up to 11,500 cubic metres per day of treated wastewater from the Huntly WWTP into the Waikato River	13/04/2011	31/03/2029
AUTH119648.01.01	Current	Discharge contaminants to air from activities associated with the Huntly WWTP	13/04/2011	31/03/2029
AUTH119649.01.01	Current	Use, upgrade and maintenance of an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Huntly WWTP	13/04/2011	31/03/2029
AUTH119650.01.01	Current	Discharge treated wastewater (via seepage) to land and groundwater from activities associated with the Huntly WWTP	13/04/2011	31/03/2029
AUTH119651.01.01	Current	Discharge treated wastewater (via flooding of wetlands during storm events) to a tributary of the Kimihia Stream from activities associated with the Huntly WWTP	13/04/2011	31/03/2029
AUTH130140.01.01	Current	To place a pipe bridge over an unnamed tributary of Lake Hakanoa in Huntly	19/09/2013	10/09/2048

This report examines the level of compliance of Waikato District Council with the selected conditions of the resource consents.

2 BACKGROUND

The Huntly wastewater treatment plant (WWTP) is operated by Watercare Services Limited under a contract with Waikato District Council (WDC). WDC manages the plant to receive, treat and discharge municipal wastewater from the township of Huntly on behalf of the local community.

An upgrade to the plant is planned and due to be constructed in the 2025-2028 and this is planned to rectify the ammoniacal nitrogen exceedance issue. The site has had its ponds desludged recently and this should also enable the performance to improve as well as increase capacity. Huntly WWTP pond desludging was completed in October 2021.

The consent holder has proposed the following:

Huntly WWTP upgrade works are budgeted FY 2025-28 under the current AMP funding.

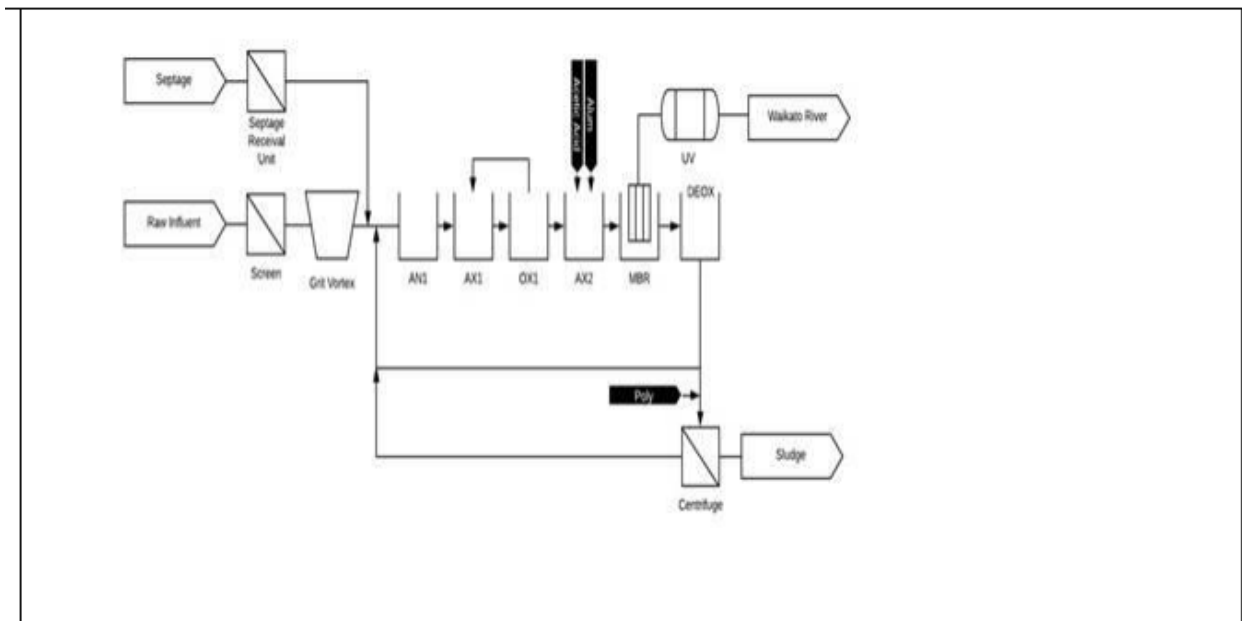
The concept upgrade plan for the Huntly WWTP was completed in August 2021. The plan considers a staged implementation of works to allow current non – compliances to be resolved whilst working

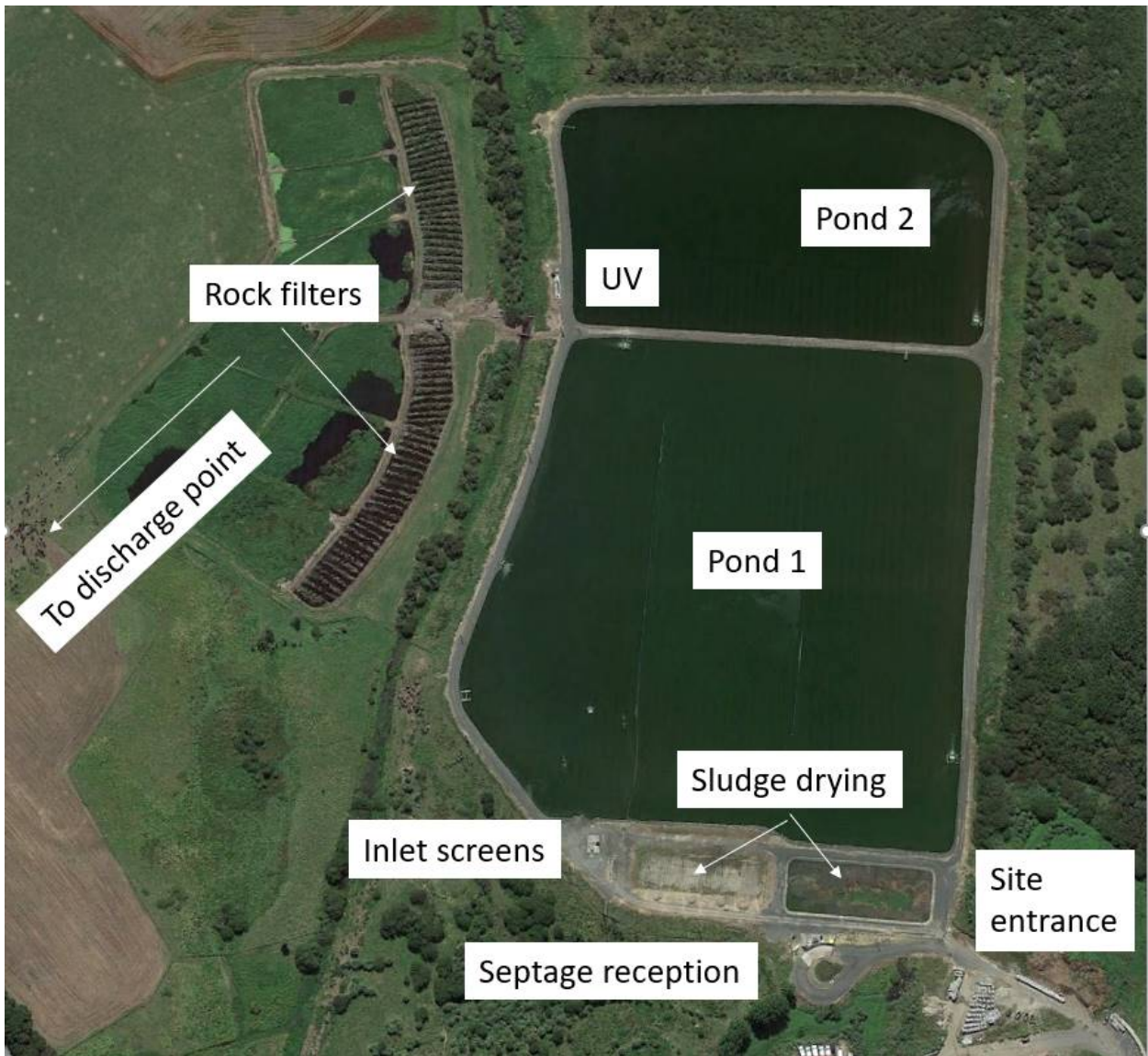
towards the probable new consent limits that will be when new consent is issued in 2028/2029.

The concept upgrade plan considers the following:

- Geotechnical conditions
- Existing asset condition limitations
- Power supply limitations and upgrade requirements
- Likely ultimate consent conditions
- Likely discharge options
- Growth (both Ohinewai Sleepyhead development and other Waikato 2070 growth in the Huntly WWTP catchment area).
- Septage receiving capacity
- Bio- solids handling – High level analysis to determine if the site is suitable for a district wide processing facility.

The preferred upgrade option for Huntly WWTP consists of a Bardenpho, MBR, UV process units as shown in the process flow diagram below. The preferred option was determined using MCA process across 4 upgrade options. Following the upgrade the preform to the Pukekohe WWTP consent limits. The project will now be on hold until funding is released by WDC in 2024/25 financial year.





2.1 PREVIOUS COMPLIANCE HISTORY

Date Period	Site Compliance
1 July 2020 to 30 June 2021	Low risk Non-Compliance
1 July 2019 to 30 June 2020	Partial compliance
1 July 2018 to 30 June 2019	Partial compliance
1 July 2017 to 30 June 2018	Partial compliance
1 July 2016 to 30 June 2017	Partial compliance

The site has been underperforming for the previous 2 years and has been issued with two formal warnings for the previous two audits for 2018-2019 and 2019-2020.

Enforcement details

IRISID	Details
EAC7798	17/03/21 (Served) - Formal Warning - Non-compliance with limits during the 2019-2020 compliance period
EAC6952	06/03/20 (Served) - Formal Warning - Discharge of non-compliant wastewater to the Waikato River from the Huntly WWTP

Please note: For the 2021-22 compliance year WRC has commenced using the new MfE compliance monitoring scoring regime that has been implemented nationwide for all regional councils. This new scoring system is designed to bring all the regions into line and make the measuring of national compliance much easier to compare. A full definition is available at the end of this report in appendix 1.

3 COMPLIANCE ASSESSMENT

Unless otherwise specified in this document this assessment covers the period from **1 July 2020 to 30 June 2021**.

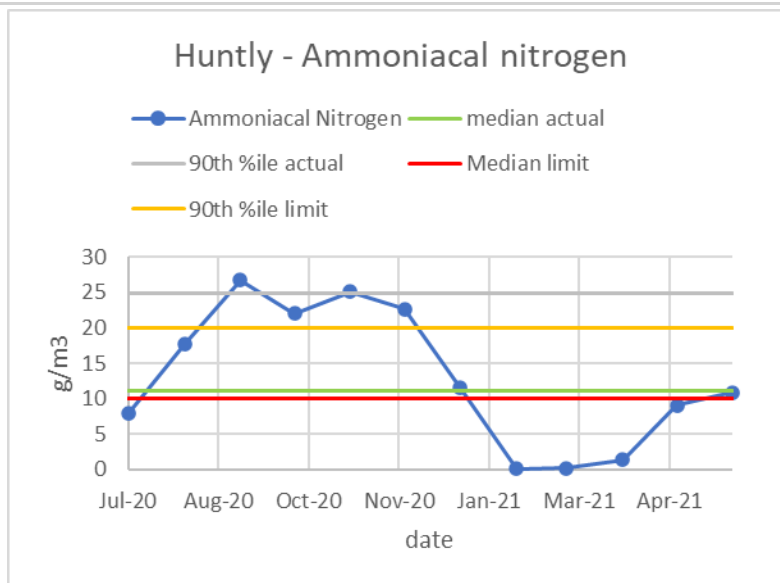
This compliance assessment has been undertaken based on the submitted annual report by the consent holder, monitoring data supplied throughout the compliance period and any site inspections undertaken. Some administration, duplicate or irrelevant conditions have been omitted for brevity.

Please note that a description of the classification system used to describe compliance status is given in Appendix 1 of this report.

AUTH119647.01.02 - Water - sewage

Activity Authorised: Discharge up to 11,500 cubic metres per day of treated wastewater from the Huntly WWTP into the Waikato River	
Condition No.	Description
1	The wastewater treatment and disposal system shall be designed, operated and maintained in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the resource consent conditions below, which shall prevail should any inconsistency occur between the conditions and the application documents.
Evidence	
Status Reasoning	
Action Required	Full Compliance
3	Notwithstanding the stated limits in conditions of this consent, the consent holder shall make all reasonable and practical efforts to ensure that the final effluent quality is maximised within the capabilities of the treatment system at all times.
Evidence	
Status Reasoning	
Action Required	Full Compliance
4	The maximum volume of treated wastewater discharged shall not exceed 11,500 cubic metres per day.

Evidence	Maximum daily discharge was 4599m3	
Status Reasoning		
Action Required		Full Compliance
6.	<p>The consent holder shall ensure that, no later than 1 December 2012, the quality of the discharge immediately after all controlled treatment processes and before any wetlands shall comply with the following limits: i) The pH of the discharge shall not be less than 6 or greater than 9 pH units; ii) The median five day carbonaceous biochemical oxygen demand concentration shall not exceed 30 grams per cubic metre and the 90th percentile shall not exceed 60 grams per cubic metre; iii) The median suspended solids concentration shall not exceed 40 grams per cubic metre and the 90th percentile shall not exceed 100 grams per cubic metre; The monitoring point for suspended solids shall be at the outlet from the gravel beds until 30 November 2016. From 1 December 2016 the median suspended solids concentration shall not exceed 30 grams per cubic metre. iv) The median ammoniacal-nitrogen concentration shall not exceed 10 grams per cubic metre and the 90th percentile shall not exceed 20 grams per cubic metre; v) The median total nitrogen (TN) concentration shall not exceed 25 grams per cubic metre; vi) The median summer (December to May inclusive) total nitrogen (TNsummer) concentration shall not exceed 20 grams per cubic metre; vii) The median summer (December to May inclusive) total nitrogen load (TNload) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 57 kilograms per day; viii) The median total phosphorus (TP) concentration shall not exceed 8 grams per cubic metre; ix) The median summer (December to May inclusive) total phosphorus (TPsummer) concentration shall not exceed 8 grams per cubic metre; x) The median summer (December to May inclusive) total phosphorus load (TPload) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 17.3 kilograms per day; xi) The median Escherichia coli (E-coli) concentration in any 12 month period shall not exceed 126 cfu per100 millilitres. For the purposes of this condition, to determine compliance with the median limits (excluding E.coli) no more than six samples in any 12 consecutive monthly samples over the period 1 July to 30 June each year shall exceed the specified limit. To determine compliance with the summer median limits, no more than 3 of the 6 monthly samples in any given summer (December to May) shall exceed the specified limit. To determine compliance with the median E.coli limit, no more than 26 samples in any 52 consecutive weekly samples shall exceed the specified limit. To determine compliance with the 90th percentile limits, no more than one sample in any ten consecutive monthly sampling events shall exceed the specified limit. Note: The discharge of treated wastewater to the Waikato River from the Ngaruawahia Wastewater Treatment Plant is authorised by consent 119642.</p>	
Evidence	<p>i) The pH of the discharge shall not be less than 6 or greater than 9 pH units;</p> <p>Non- Compliant - two monthly samples were 9.2 and 9.4 in January and February 2021 which would have raised the median level to 9.04 instead of the reported 7.7. It is not clear where those two reported monthly results came from or went to by the time the end of year report was submitted</p> <p>ii) The median five day carbonaceous biochemical oxygen demand concentration shall not exceed 30 grams per cubic metre and the 90th percentile shall not exceed 60 grams per cubic metre;</p> <p>Compliant - results were 6.2 and 10.9</p> <p>iii) The median suspended solids concentration shall not exceed 40 grams per cubic metre and the 90th percentile shall not exceed 100 grams per cubic metre; The monitoring point for suspended solids shall be at the outlet from the gravel beds until 30 November 2016. From 1 December 2016 the median suspended solids concentration shall not exceed 30 grams per cubic metre.</p> <p>Compliant - results were 26 and 74.7g/m3</p> <p>iv) The median ammoniacal-nitrogen concentration shall not exceed 10 grams per cubic metre and the 90th percentile shall not exceed 20 grams per cubic metre;</p> <p>Non-compliant - results were 11.2 and 24.6g/m3</p>	



v) The median total nitrogen (TN) concentration shall not exceed 25 grams per cubic metre;

Compliant - result was 19.6g.m3

vi) The median summer (December to May inclusive) total nitrogen (TNsummer) concentration shall not exceed 20 grams per cubic metre;

Compliant - result was 10.6g/m3

vii) The median summer (December to May inclusive) total nitrogen load (TNload) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 57 kilograms per day;

Compliant - result was 32.79kg/day

viii) The median total phosphorus (TP) concentration shall not exceed 8 grams per cubic metre;

Compliant - result was 2.86g/m3

ix) The median summer (December to May inclusive) total phosphorus (TPsummer) concentration shall not exceed 8 grams per cubic metre;

Compliant - result was 1.2g/m3

x) The median summer (December to May inclusive) total phosphorus load (TPload) for Ngaruawahia Wastewater Treatment Plant and Huntly Wastewater Treatment Plant combined shall not exceed 17.3 kilograms per day;

Compliant - result was 0.3kg/day

xi) The median Escherichia coli (E-coli) concentration in any 12 month period shall not exceed 126 cfu per100 millilitres. For the purposes of this condition, to determine compliance with the median limits (excluding E.coli) no more than six samples in any 12 consecutive monthly samples over the period 1 July to 30 June each year shall exceed the specified limit. To determine compliance with the summer median limits, no more than 3 of the 6 monthly samples in any given summer (December to May) shall exceed the specified limit. To determine compliance with the median E.coli limit, no more than 26 samples in any 52 consecutive weekly samples shall exceed the specified limit. To determine compliance with the 90th percentile limits, no more than one sample in any ten consecutive monthly sampling events shall exceed the specified limit.

Compliant - 1.6 MPN/100ml

Status Reasoning

7 out of 12 samples for ammoniacal nitrogen failed the median limit of 10g/m3 with a result of 11.2g/m3.

	<p>There were 4 out of 12 samples that failed the 90% ile limit of 20g/m3 with a result of 24.9g/m3</p> <p>There were two pH samples returned that were above the consented median limit of pH9.0 as the calculated median was 9.04. the reported median was 7.7. despite the pH median being slightly exceeded it is unlikely that this very minor exceedance would have any noticeable adverse effect on the Waikato River at Huntly where the discharge occurs.</p>	
Action Required	Undertake upgrade to Huntly WWTP to improve compliance with the ammoniacal nitrogen limit	Moderate Compliance Non-Compliance
7	Decommissioning of the gravel filters and construction of the rock-lined channel shall be completed within 12 months of commencement of this resource consent.	
Evidence		
Status Reasoning		
Action Required		Not assessed
10	Should the measured median concentration or 90th percentile concentration for either five day carbonaceous biochemical oxygen demand, suspended solids, or ammoniacal-nitrogen exceed 90% of the consented limits, as specified in condition 6 of this consent, for 2 of 3 consecutive years then a “trigger” level will be met. The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. The upgrade undertaken shall be designed to reduce the median or 90th percentile concentration, as applicable, for the parameter for which the trigger was reached to less than 80% of the consented limit for that parameter.	
Evidence	<p>Huntly WWTP pond desludging is estimated to be completed in October 2021</p> <ul style="list-style-type: none"> &bull; Huntly WWTP upgrade works are budgeted FY 2025-28 under the current AMP funding. <p>> The concept upgrade plan for the Huntly WWTP was completed in August 2021. The plan considers a staged implementation of works to allow current non – compliances to be resolved whilst working towards the probable new consent limits that will be when new consent is issued in 2028/2029. The concept upgrade plan considers the following:</p> <ul style="list-style-type: none"> &bull; Geotechnical conditions &bull; Existing asset condition limitations &bull; Power supply limitations and upgrade requirements &bull; Likely ultimate consent conditions &bull; Likely discharge options &bull; Growth (both Ohinewai development and other Waikato 2070 growth in the Huntly WWTP catchment area). &bull; Septage receiving capacity &bull; Bio- solids handling – High level analysis to determine if the site is suitable for a district wide processing facility. <p>The preferred upgrade option for Huntly WWTP consists of a Bradenpho, MBR, UV process units as shown in the process flow diagram below. The preferred option was determined using MCA process across 4 upgrade options. Following the upgrade the preform to the Pukekohe WWTP consent limits. The project will now be on hold until funding is released by WDC in 2024/25 financial year</p>	
Status Reasoning		
Action Required	Ensure funding is available for the 2024/2025 financial year and that an upgrade occurs and is commissioned by the expiry of this resource consent	Full Compliance
11	Should the measured median concentration for total nitrogen (TN), total phosphorus (TP) or E.coli exceed 90% of the consented limits, as specified in condition 6 of this consent, for 2 of 3 consecutive years then a “trigger” level will be met. The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached.	

	The upgrade undertaken shall be designed to reduce the median for the parameter for which the trigger was reached to less than 80% of the consented limit for that parameter.
Evidence	The trigger levels were met for two of the required three years in previous audits and therefore the upgrade plans are going through the feasibility study and funding is being considered for 2025-2028.
Status Reasoning	
Action Required	Not assessed
12	Should the measured median summer (December to May inclusive) mass load for either total nitrogen (TNload) or total phosphorus (TPload) for Huntly and Ngaruawahia combined reach 90% of the consented limit, as specified in condition 6 of this consent, for 2 of 3 consecutive summer periods then a “trigger” level will be met. The consent holder shall design, build and commission the appropriate upgrade to the treatment process within two years after the “trigger” level is reached. The upgrade undertaken shall be designed to reduce the combined summer mass load of the nutrient for which the trigger was reached to less than 80% of the consented limit for that parameter.
Evidence	no trigger levels were met for this condition Please see submitted summary- All discharge monitoring parameters are within the consented (permitted) limits, Huntly WWTP discharge remains non-compliant for Ammoniacal Nitrogen • Huntly WWTP pond desludging is estimated to be completed in October 2021 • Huntly WWTP upgrade works are budgeted FY 2025-28 under the current AMP funding. • Due to budget constraints WDC are not able to fund for any major upgrades for Huntly WWTP during the 2020/24 period.
Status Reasoning	
Action Required	Full Compliance
13	Unless otherwise agreed with the Waikato Regional Council in writing, the consent holder shall ensure that the treatment system is upgraded in accordance with the application documentation to the satisfaction of Waikato Regional Council.
Evidence	Upgrade Proposals – Huntly 2009/10 Carry out maintenance on the surface-flow wetlands and decommission the gravel-bed cells.- COMPLIANT Construct rock-lined stream after wetlands. -COMPLIANT Modify pipeline from secondary oxidation pond to divert wastewater to pumping station in the event of severe flooding. -COMPLIANT- diversion in place 2011/12 Install curtains in secondary (maturation) pond to prevent short-circuiting. - NON-COMPLIANT 2016/17 Install bottom-deployed aeration and biological growth media in the inlet zone - NON-COMPLIANT Install bottom-deployed aeration and biological growth media near the end of the facultative zone (primary pond).- COMPLIANT
Status Reasoning	
Action Required	Low Risk Non-Compliance
14	The consent holder shall continuously monitor the flow rate of wastewater entering and leaving the treatment plant and shall record the total daily influent and discharge volumes.
Evidence	Compliant- Daily inflows and outflows recorded in Water Outlook

Status Reasoning		
Action Required		Full Compliance
15	The consent holder shall continuously monitor and record rainfall at the site on a daily basis.	
Evidence	<p>An on-line weather station was installed at the Huntly WWTP. However, there was no rainfall data available for this site.</p> <p>Watercare have engaged the contractors/consultants to install and link rain gauges across the WWTPs. The project is currently underway at Huntly with the rain gauge located at the water treatment plant.</p> <p>The manually downloaded rain gauge data is attached as Appendix Three. The data is provided in American format (month/day/year) and is available since August 2021.</p>	
Status Reasoning		
Action Required		Full Compliance
16	The consent holder shall, prior to January each year, calculate the ratio of daily Peak Wet Weather Flow (PWWF) to Average Dry Weather Flow (ADWF). Where the ratio of PWWF to ADWF exceeds 4.5, the consent holder shall prepare an Infiltration Management Plan and provide this to Waikato Regional Council for review prior to implementation. For the purposes of this condition, calculation of ADWF will be taken as the median daily wastewater flow measured at the inlet to the oxidation pond during the month of March for the preceding year.	
Evidence	ratio is 3.0	
Status Reasoning		
Action Required		Full Compliance
17	The consent holder shall undertake an investigation into the extent and magnitude of ammoniacal-nitrogen in the wastewater discharge plume in the Waikato River during low flow conditions. Sampling of ammoniacal-nitrogen shall, as a minimum, be conducted mid-column at six sites below the discharge outfall on three occasions over the summer period (when flows are low). The frequency of monitoring may be reviewed after a minimum of three years of data has been collected, upon request to and approval by a Programme Manager in the Resource Use Group of Waikato Regional Council.	
Evidence	<p>This programme commenced during the 2012/13 summer and was followed up in the 2013/14 and 2014/15 summers. A full report was submitted to WRC on 30 May 2014. The 2014 and 2015 reports concluded that:</p> <ul style="list-style-type: none"> o The Huntly WWTP discharge was not causing any marked increase in the ammoniacal nitrogen concentrations at the time of sampling, during low river flow. o The discharge plume ammoniacal-nitrogen concentrations were well below the Waikato Regional Plan standards. o In 2018-19 Annual report to WRC, WDC requested to cease testing based on findings of the reports. <p>2018-19 Audit report from WRC have stated that WRC have given permission to suspend the sampling for ammoniacal nitrogen in the river until further notice.</p>	
Status Reasoning		
Action Required		Full Compliance
20	All wastewater quality analyses shall be undertaken by an IANZ accredited or equivalent laboratory. All methods used shall be appropriate for the wastewater analyses undertaken.	
Evidence		
Status Reasoning		

Action Required		Full Compliance
21	The consent holder shall prepare an Operations and Management Plan. This Plan shall be prepared by a suitably qualified and experienced person and shall detail how the treatment and disposal system is to be operated and maintained to ensure compliance with the conditions of this consent and consents 119648, 119649, 119650 and 119651. As a minimum the Plan shall include the following matters: i) A description of the wastewater treatment plant including as-built plans for the wastewater treatment facilities; ii) A description of the sequence, timing and methods of construction of upgrades to the treatment plant; iii) A description and schedule of the routine inspection, monitoring and maintenance procedures to be undertaken to ensure effective plant operation; iv) A schedule of monitoring to be carried out to ensure effective plant operation and compliance with consent conditions; v) A sampling location plan; vi) A schedule of the treatment plant critical aspects and the detailed response and contingency plans to address anticipated variations from normal plant operation; vii) Procedures for recording routine maintenance and all repairs that are undertaken; viii) Chain of command, responsibility and notification protocols; ix) The current infiltration management plan; x) Procedures for improving and/or reviewing the plant management plan. This Plan shall be lodged with Waikato Regional Council within six months of commencement of this consent, and shall be reviewed and updated annually and as required as a result of any changes in plant operation or management. An electronic copy of the management plan shall be provided to Waikato Regional Council within 10 working days of a request to do so. Advice note: The Waikato Regional Council reserves the right to make comment on the Operations and Management Plan submitted and any subsequent changes to the Plan.	
Evidence	Section 4 of the O&M plan refers to the management structure. Watercare Ops team is currently reviewing the Operations and Management Plan across all wastewater treatment plants, due to the covid lockdowns and workload management there was a delay to this process. WDC/WSL request WRC for the permission to submit the updated O&M plans during the 2021/22. Details of operational and maintenance procedures to minimise odour release during pond desludging and pond drying and handling will be included in the plan.	
Status Reasoning	A delay in the submission date for the O&M plan for this site	
Action Required	Please submit the required plan as soon as practicable	Low Risk Non-Compliance
23	The consent holder shall ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.	
Evidence	All contractors employed at the treatment site are inducted in both health and safety procedures and relevant conditions of this consent.	
Status Reasoning		
Action Required		Full Compliance
24	In conjunction with consent 119648, the consent holder shall maintain and keep a Complaints Register for all complaints made about the treatment and discharge operations received by the consent holder. The Register shall record: i) The date, time and duration of the event/incident that has resulted in the complaint; ii) The location of the complainant when the event/incident was detected; iii) The possible cause of the incident; iv) The weather conditions and wind direction at the site when the incident allegedly occurred, if significant to the complaint; v) Any corrective action undertaken by the consent holder in response to the complaint. The Register shall be made available to the Waikato Regional Council at all reasonable times. Complaints which may indicate non-compliance with the conditions of this resource consent shall be forwarded to the Waikato Regional Council within 5 working days of the complaint being received.	
Evidence	Councils CRM database records all complaints from the public. please see Appendix Two for Wastewater related queries or complaints for the 2020-21 year	
Status Reasoning		

Action Required		Full Compliance
25	The consent holder shall place and maintain a sign in the vicinity of the discharge to the Waikato River, in such a way that it is conspicuous to river users, advertising of the presence of the wastewater discharge and warning against the use of the location for swimming.	
Evidence	A sign is located in the vicinity of the discharge that alerts and warns people of the presence of the wastewater discharge	
Status Reasoning		
Action Required		Full Compliance
26	The consent holder shall be responsible for any erosion that occurs as a result of the exercise of this consent and for any erosion works that become necessary to preserve the integrity and stability of the banks of the Waikato River. Note: A separate resource consent may be required as a result of the need to undertake erosion control works. Any such consent shall be obtained by the consent holder at their sole expense prior to any works being undertaken.	
Evidence	There are no current issues regarding erosion at the Huntly discharge site	
Status Reasoning		
Action Required		Full Compliance
27	The discharge to the Waikato River shall be via a multi-port diffuser located on the bed of the Waikato River.	
Evidence	<p><i>The Huntly discharge is via a multi-port diffuser. Ports 2, 4, 6 and 8 are blocked off. &bull; Watercare completed the Dive Surveys in March 2021 and the reports were forwarded to WRC in April 2021. Next dive surveys are scheduled for September/October 2021, once Watercare receives the report we will forward to WRC.</i></p> <p>The dive report done in March 2021 stated the following:</p> <p>Huntly WWTP Diffusers 5 diffusers were found, and the following observations made: Diffuser 1: 0.5 metre clearance above riverbed; flow observed.</p> <p>Diffuser 2: 0.5 metre clearance above riverbed; flow observed.</p> <p>Diffuser 3: 0.7 metre clearance above riverbed; flow observed.</p> <p>Diffuser 4: 1.0 metre clearance above riverbed; flow observed.</p> <p>Diffuser 5: 1.0 metre clearance above riverbed; flow observed.</p> <p>No damage was found, however there was some weed present around the bases of the diffusers. The warning sign was clearly visible from the river</p>	
Status Reasoning	the information in the dive report was insufficient to distinguish which ports it was that were open or closed off. this made it difficult to assess compliance.	
Action Required	Please ensure dive surveys provide the necessary detail to enable an assessment of compliance can be made	Low Risk Non-Compliance
28	Ports 2, 4, 6 and 8 of the diffuser, as numbered from the true right bank of the Waikato River, shall remain closed unless specifically permitted in writing by the Waikato Regional Council.	
Evidence	Unable to assess compliance from the information contained in the dive report submitted	
Status Reasoning		
Action Required		Not assessed

29	The consent holder shall maintain the outfall diffuser in an operational state such that the discharge from ports 1, 3, 5, 7 and 9 is uniform along the operational length of the diffuser and providing effective dispersion of the wastewater in the river flow.
Evidence	No damage was found, however there was some weed present around the bases of the diffusers
Status Reasoning	
Action Required	Full Compliance
30	The consent holder shall undertake a survey of the diffuser at six monthly intervals to demonstrate compliance with conditions 28 and 29 of this consent. The frequency of the surveys may be reduced to no less than every two years following written request to and approval from the Waikato Regional Council. The results of each survey and any recommendation as to the frequency of future surveys shall be provided to the Waikato Regional Council within 30 days of the survey.
Evidence	The frequency has been reduced to annually
Status Reasoning	
Action Required	Full Compliance
31	The consent holder shall forward the results of the monitoring undertaken pursuant to conditions 14, 15, 17 and 19 to the Waikato Regional Council, via electronic means, within one month of receipt of the results by the consent holder.
Evidence	Monthly reports are submitted as required
Status Reasoning	
Action Required	Full Compliance
32	The consent holder shall provide to the Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu a written report by 30 September each year, addressing the following: i) A summary of the monitoring results required by conditions of this resource consent for the year ending 30 June; ii) Critically analyse the monitoring data collected and comment on any emerging trends; iii) Comment on compliance with the conditions of this resource consent; iv) Any reasons for non-compliance or difficulties in achieving compliance with the conditions of this resource consent and a description of and a summary of the efficacy of any remedial works undertaken; v) Comment on infiltration rates and any remedial works planned and the efficacy of these works in subsequent reports; v) Any other issue considered relevant to the consent holder. A quarterly report shall be prepared and distributed at the end of March, June and December of each year. These progress reports shall address the monitoring results for the preceding 12 months, including the rolling 12 month median value. The reports shall be distributed to Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu.
Evidence	It is assumed that WDC/WSL provides the relevant reports to the stakeholders identified. the consent holder states in their annual report that: <i>This report, the attached spreadsheet and the consent summary report are submitted in compliance with this condition</i>
Status Reasoning	
Action Required	Not assessed
33	The consent holder shall notify the Waikato Regional Council within 24 hours (where practicable) of the consent holder becoming aware of the limits specified in conditions 4, 5 and 6 of this resource consent being exceeded, or any accidental discharge, plant breakdown or other circumstance which is likely to result in the limits of this consent being exceeded. The consent holder shall, within 10 working days of the incident occurring, provide a written report to the Waikato Regional Council, identifying the breach, possible causes and steps to ensure future compliance.

Evidence	<p>Please see the attached summary spreadsheet.</p> <p>All incidents are notified to WRC as required</p> <p>WSL-WRC liaison meetings were also held during the 2020-21 period to address any non-compliances and update on actions to improve compliance.</p>
Status Reasoning	
Action Required	Full Compliance
34	<p>The consent holder shall as soon as reasonably practicable, notify the Waikato District Council (Community Assets – Operations Unit), Watercare Services Limited, and the Waikato Regional Council of an event that may in itself, or as a consequence of an event, have a significant adverse effect on the quality of the water within the Waikato River at the abstraction points of the Te Kauwhata and Tuakau (Auckland) Water Supplies. The consent holder shall record the reasons why the situation occurred, the actions taken by the consent holder and an assessment of what measures can be adopted in the future to minimise such occurrences and upon written request from the Waikato Regional Council provide a report to the Waikato Regional Council and the Medical Officer of Health addressing this matter.</p>
Evidence	<p>Water abstraction parties are notified of discharges to the Kimihia Stream</p>
Status Reasoning	
Action Required	Full Compliance
35	<p>The consent holder shall monitor the actual performance of the Huntly WWTP in respect to the median summertime mass-load of nutrients and of the Huntly WWTP in respect of all other parameters for the period from 1 December 2012 to 31 May 2015 (three summer seasons). i) Immediately following 31 May 2015 the consent holder shall review the performance and review the options for upgrading the treatment processes, all in consultation with Waahi Whaanui Trust and Waikato-Tainui Kauhanganui Incorporated. The preferred upgrade option shall be determined and reported to Waikato Regional Council not later than 31 October 2015. ii) The preferred upgrade option shall be constructed and commissioned not later than 30 November 2016. iii) The 2015 review shall include consideration of the future of both the surface-flow and the subsurface-flow wetland cells, based on the monitored performance and the decision in relation to the preferred upgrade option, all in consultation with Waahi Whaanui Trust and Waikato-Tainui Kauhanganui Incorporated. iv) The 2015 review shall also give consideration to the ongoing appropriateness of the median combined summertime mass-load limits for Total Nitrogen and Total Phosphorous from Huntly WWTP, taking account of the actual performance of the two plants from 1 December 2012 to 31 May 2015 and any changes in the environmental objectives for the Waikato River after 31 March 2011. v) Recommendation whether the wetlands should remain in the treatment process or be decommissioned and the reasons for this decision; vi) A plan for the decommissioning or alteration of the wetland, should the conclusion be that the wetlands should be decommissioned or altered in some way.</p>
Evidence	<p>The combined mass loadings are compliant with the consented limits</p>
Status Reasoning	
Action Required	Full Compliance
36	<p>Waikato District Council shall retain suitably qualified persons to review the findings outlined in Appendix 5 “Alternatives Study” of the AEE, recorded on Waikato Regional Council’s document system numbered 1458402, at intervals as below. The investigations shall include the feasibility, technology and economics of alternative collection, treatment and disposal systems for wastewater including land-based disposal options. The reviews shall be carried out in consultation with Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu and the findings of the reviews shall be adopted by Waikato District Council for the proposed upgrade of the treatment system. The first review shall focus on alternative treatment options for removal of algae from the effluent after the pond systems and UV disinfection prior to the proposed rock-lined channel. The review shall include (but not be limited to) consideration of sand filter, Bio-Filtro and an algae treatment system that has been identified by Hopuhopu Manawhenua Roopu. This review shall be completed and reported to the Waikato</p>

	Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu not later than 30 September 2011. The second review shall consider all aspects the matters listed in condition 35 above. The third review shall cover the same matters and options as the second review and shall be completed and reported to Waikato Regional Council, Waikato-Tainui Te Kauhanganui Incorporated (Claims and Environmental unit) and the Hopuhopu Manawhenua Roopu not later than 31 March 2022. Note: Commissioning of any treatment upgrade is subject to condition 13.	
Evidence	The first treatment review report was completed on the 29 September 2015. Council long term plan has budgeted for Huntly WWTP upgrade in 2024/2025, due to the budget constrains WDC/WSL were not able to carry out a review for upgrade in 2020/21 period. A treatment review will be conducted prior to the upgrade works for Huntly WWTP	
Status Reasoning		
Action Required	Please ensure a treatment review report is undertaken as soon as possible and before any decision is made on an upgrade option.	Low Risk Non-Compliance
37	The consent holder shall, by 30 September 2015 and every five years thereafter, submit to Waikato Regional Council a wastewater treatment system review report, the scope of which shall include: i) An analysis of the performance of the treatment system with respect to the initial plant design; ii) Identification of any deficiencies in the plant design or operation and the measures that are or have been undertaken to address these deficiencies and the anticipated (or actual) improvements in treated wastewater quality; iii) Timetable for the treatment plant capital upgrade to cater for actual population growth; iv) A review of the trend in the combined contribution made by the Ngaruawahia and Huntly wastewater discharges to the Total Nitrogen and Total Phosphorus load in the Waikato River at Mercer Bridge since the granting of this consent.	
Evidence	The first treatment review report was completed on the 29 September 2015. Council long term plan has budgeted for Huntly WWTP upgrade in 2024/2025, due to the budget constrains WDC/WSL were not able to carry out a review for upgrade in 2020/21 period. A treatment review will be conducted prior to the upgrade works for Huntly WWTP	
Status Reasoning	A reported delay in submission of a report due in 2020	
Action Required		Low Risk Non-Compliance
	Authorisation Compliance:	Low risk of Non-Compliance

AUTH119648.01.01 - Air - odour

Activity Authorised: Discharge contaminants to air from activities associated with the Huntly WWTP

Condition No.	Description
1	The discharge to air shall be undertaken in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the conditions below which shall prevail should any inconsistency occur between the conditions and the above documents.
Evidence	No reports or complaints of odour or particulate matter have been received by WRC during this compliance period relating to this activity.
Status Reasoning	

Action Required		Full Compliance
2	The consent holder shall ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
4	The operation, management and maintenance of the Huntly Wastewater Treatment Plant shall not result in any objectionable odours at or beyond the boundary of the properties on which the treatment plant is located.	
Evidence	<p>No reports or complaints of odour or particulate matter have been received by WRC during this compliance period relating to this activity.</p> <p>WDC/WSL have received the following complaints relating to odours suspected to originate at the WWTP:</p> <p>WTR0528/21 1001227 11/08/2020 1:54:50 PM HUNTLY Wastewater Odour Very strong odour of Sewage 11/8 Sent Caleb. no odour at all. suspecting the smell was coming from the WW ponds D.S Completed, Work Completed, 125 Kimihia Road, HUNTLY Phone, or 12/08/2020 8:08:43 AM</p> <p>WTR0529/21 1001483 11/08/2020 2:03:37 PM HUNTLY Wastewater Odour around Rayner road Sent Caleb. no odour at all. suspecting the smell was coming from the WW ponds D.S Completed, Work Completed, Y 43 Rayner Road, HUNTLY 12/08/2020 8:09:42 AM</p>	
Status Reasoning		
Action Required		Full Compliance
5	There shall be no discharge of airborne contaminants as a result of the activities authorised by this resource consent to the extent that it causes an adverse effect at or beyond the boundary of the subject property on which the treatment plant is located. Note: For the purpose of this consent, the Waikato Regional Council will use the guidelines for assessment in chapter 6.4 of the Waikato Regional Plan to determine whether adverse effects are occurring from the discharge of odour or particulate matter.	
Evidence	No reports or complaints of odour or particulate matter have been received by WRC during this compliance period relating to this activity.	
Status Reasoning		
Action Required		Full Compliance
6	The consent holder shall prepare an Odour Management Plan. This Plan shall be prepared by a suitably qualified and experienced person and shall detail the methods and operational procedures adopted by the consent holder to ensure compliance with the conditions of this consent. The Plan may form part of the Operations and Management Plan specified in consent 119647. As a minimum the Odour Management Plan shall address the following matters: i) A description of the entire wastewater treatment facility; ii) A description of routine inspection, monitoring and maintenance procedures to be undertaken to ensure effective plant operation and compliance with consent conditions; iii) Details of operational and maintenance procedures to minimise odour release from the inlet screen; iv) Details of operational and maintenance procedures to minimise odour release from the oxidation pond; v) Details of operational and maintenance procedures to minimise odour release during pond desludging and pond sludge drying and handling; vi) Details of contingency plans and procedures to address power or equipment failure at the treatment plant; vii) Details of the odour complaints procedure, record keeping and response procedure. This Plan shall be lodged with Waikato Regional Council within six months of commencement of this consent, and shall be reviewed and updated annually and as required as a result of any changes in plant operation or management. An electronic copy of the management plan shall be provided to Waikato Regional Council within 10 working days of a request to do so. Note: The Waikato Regional Council reserves the right to make comment on the Operations and Management Plan submitted and any subsequent changes to the Plan.	

Evidence	Doc ref 21078625 An Odour management plan is contained within the site Management Plan and the last version submitted to WRC was in 2014 upgrade plan doc ref 20274546	
Status Reasoning		
Action Required	Please review and update the odour management plan to ensure it is still relevant and aligns with the current on site processes.	Full Compliance
7	In conjunction with consent 119647, the consent holder shall maintain and keep a Complaints Register for all complaints made about the treatment and discharge operations received by the consent holder. The Register shall record: i) The date, time and duration of the event/incident that has resulted in the complaint; ii) The location of the complainant when the event/incident was detected; iii) The possible cause of the incident; iv) The weather conditions and wind direction at the site when the incident allegedly occurred; v) Any corrective action undertaken by the consent holder in response to the complaint. The Register shall be made available to the Waikato Regional Council at all reasonable times. Complaints which may indicate non-compliance with the conditions of this resource consent shall be forwarded to the Waikato Regional Council within 5 working days of the complaint being received.	
Evidence	Waikato DC maintains the CRM customer complaints system, see appendix 2	
Status Reasoning		
Action Required		Full Compliance
8	The consent holder shall notify the Waikato Regional Council of any incident, including power, mechanical or process failure, leading to a significant emission of odour from the plant, within 24 hours of the incident being brought to the attention of the consent holder, or the next working day. A written report shall be forwarded to the Waikato Regional Council within seven working days of the event occurring describing the incident, the reasons for it occurring, its consequences (including the nature of any complaints), the measures taken to remedy or mitigate its effects, and any measures taken to prevent a recurrence of the event, including any changes proposed to the Odour Management Plan.	
Evidence	No operational odour producing events have occurred during this compliance period.	
Status Reasoning		
Action Required		Not assessed
		Full Compliance
Authorisation Compliance:		

AUTH119649.01.01 - Bed - structure

Activity Authorised: Use, upgrade and maintenance of an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Huntly WWTP

Condition No.	Description
1	The outfall structure shall be maintained and operated in general accordance with: i) The application for this resource consent; ii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Assessment of Effects on the Environment" dated March 2009 and recorded on Waikato Regional Council's document system numbered 1458402; and iii) The document titled "Waikato District Council Ngaruawahia and Huntly Wastewater Resource Consents Project, Resource Consents Application: Response to RMA Section 92(1) Requests for Further Information" dated August 2009 and recorded on Waikato Regional Council's document system numbered 1531323; subject to the conditions below which shall prevail should any inconsistency occur between the conditions and the above documents.

Evidence	The dive report and inspection undertaken in March 2021 (see doc ref 18007831) states that 5 diffusers were found and flowing was observed. No damage was found, however there was some weed present around the bases of the diffusers. The warning sign was clearly visible from the river.	
Status Reasoning		
Action Required		Low Risk Non-Compliance
2	The consent holder shall ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.	
Evidence		
Status Reasoning		
Action Required		Full Compliance
4	The discharge of treated wastewater to the Waikato River shall be via a multi-port diffuser located on the bed of the Waikato River.	
Evidence	see dive report doc ref 18007831	
Status Reasoning		
Action Required		Full Compliance
5	Ports 2, 4, 6 and 8 of the diffuser, as numbered from the true right bank of the Waikato River, shall remain closed unless specifically permitted in writing by the Waikato Regional Council.	
Evidence	5 of the 8 diffuser ports were located 5 diffusers were found, and the following observations made: <ul style="list-style-type: none"> • Diffuser 1: 0.5 metre clearance above riverbed; flow observed. • Diffuser 2: 0.5 metre clearance above riverbed; flow observed. • Diffuser 3: 0.7 metre clearance above riverbed; flow observed. • Diffuser 4: 1.0 metre clearance above riverbed; flow observed. • Diffuser 5: 1.0 metre clearance above riverbed; flow observed 	
Status Reasoning	unable to ascertain from the dive report which diffuser ports were in use and which were not in use or not visible. If the first five from the true right bank were seen then the condition is not being complied with.	
Action Required	Please ensure the dive company inspects the diffuser and reports fully so that compliance can be checked against conditions.	Low Risk Non-Compliance
6	The consent holder shall maintain the outfall diffuser in an operational state such that the discharge from ports 1, 3, 5, 7 and 9 is uniform along the operational length of the diffuser and providing effective dispersion of the wastewater in the river flow.	
Evidence	The dive report from March 2021 did not contain adequate information from which an assessment of compliance could be made.	
Status Reasoning	Unable to assess whether adequate effective dispersion is being achieved based on the limited information in the dive report.	
Action Required	Please ensure that future dive inspections provide the required information to enable an assessment of compliance to be made.	Low Risk Non-Compliance
7	The consent holder shall undertake a survey of the diffuser at six monthly intervals to demonstrate compliance with conditions 5 and 6 of this consent. The frequency of the surveys may be reduced to no less than every two years following written request to and approval from the Waikato Regional	

	Council. The results of each survey and any recommendation as to the frequency of future surveys shall be provided to the Waikato Regional Council within 30 days of the survey.	
Evidence	Inspection reports are undertaken as required but subject to river flows and visibility conditions.	
Status Reasoning		
Action Required		Full Compliance
8	The consent holder shall notify the Waikato Regional Council in writing at least five working days prior to commencement of survey works.	
Evidence	Notification of dive surveys is not provided in advance	
Status Reasoning		
Action Required		Low Risk Non-Compliance
9	The consent holder shall be responsible for the structural integrity and maintenance of the multi-port diffuser and for the provision and maintenance of any erosion control works that become necessary to preserve the structural integrity of the multi-port diffuser, and/or to control erosion as a result of exercise of this consent. Any such works shall be to the satisfaction of the Waikato Regional Council. Note: A separate resource consent may be required as a result of the need to undertake erosion control works. Any such consent shall be obtained by the consent holder at their sole expense prior to any works being undertaken.	
Evidence	Any damage or debris attached to the diffusers is cleared when discovered	
Status Reasoning		
Action Required		Full Compliance
10	Any and all earthmoving machinery, pumps and generators associated with use and maintenance shall be operated in a manner which ensures that spillages of fuel, oil and similar contaminants are prevented, particularly during refueling and machinery servicing and maintenance. Refueling and lubrication activities shall be carried out away from any surface water such that any spillage can be contained and does not enter any surface water or unsealed ground.	
Evidence		
Status Reasoning		
Action Required		Not assessed
11	The consent holder shall maintain the structure so that no part of the structure is lost (e.g. breaks loose due to water) or results in a navigational hazard. Any material that is lost from the structure shall be immediately retrieved by the consent holder. Should the material lost be a hazard to navigation the Waikato Regional Council shall be informed immediately.	
Evidence		
Status Reasoning		
Action Required		Not assessed
	Authorisation Compliance:	Low Risk Non-Compliance

4 SUMMARY OF COMPLIANCE

Based on the conditions selected for monitoring, compliance has been assessed as:

Authorisation	Authorisation Description	Compliance Status
AUTH119647.01.02	Discharge up to 11,500 cubic metres per day of treated wastewater from the Huntly WWTP into the Waikato River	Low Risk Non-Compliance
AUTH119648.01.01	Discharge contaminants to air from activities associated with the Huntly WWTP	Full Compliance
AUTH119649.01.01	Use, upgrade and maintenance of an outflow pipeline structure including an outflow diffuser on the bed of the Waikato River for the discharge of treated wastewater from the Huntly WWTP	Low Risk Non-Compliance
AUTH119650.01.01	Discharge treated wastewater (via seepage) to land and groundwater from activities associated with the Huntly WWTP	Not assessed
AUTH119651.01.01	Discharge treated wastewater (via flooding of wetlands during storm events) to a tributary of the Kimihia Stream from activities associated with the Huntly WWTP	Not assessed
AUTH130140.01.01	To place a pipe bridge over an unnamed tributary of Lake Hakanoa in Huntly	Not assessed

Overall Site Compliance: Low Risk Non-Compliance

5 DISCUSSION AND CONCLUSIONS

The performance for the Huntly WWTP for this compliance year has been generally good and compliant for all determinants except ammoniacal nitrogen and possibly pH, however I am still awaiting confirmation about the pH results differences.

Discharge Monthly Tests Parameters	Unit	Consent Limits		Trigger Limit		Measured		Compliance		
		Median	90%ile	Median	90%ile	Median	90%ile	Median	90%ile	
pH		9.0		8.5		7.7				
CBOD5	g/m3	30.0	60.0			6.2	11.0	0 / 11	0 / 11	Compliant
Ammonical Nitrogen	g/m3	10.0	20.0			11.2	24.9	7 / 12	4 / 12	X
Total Nitrogen	g/m3	25.0				19.6		3 / 12		Compliant
Total Nitrogen (Summer Limit Dec-May)	g/m3	20.0				5.8		1 / 6		Compliant
Total Phosphorus	g/m3	8.0				2.9		0 / 12		Compliant
Total Phosphorous (Summer Limit Dec-May)	g/m3	8.0				1.2		0 / 6		Compliant
Total Suspended Solids	g/m3	30.0	100.0			26.0	74.7	4 / 12	0 / 12	Compliant
E.Coli	CFU/100ml	126.0				1.6		7 / 54		Compliant
Combined Discharge		Consent Limit		Trigger Limit		Measured		Compliance		
Summer TN (Huntly & Ngaruawahia)	kg/day	57				32.79		0 / 6		Compliant
Summer TP (Huntly & Ngaruawahia)	kg/day	17.3				0.37		0 / 6		Compliant

This ponds at Huntly have recently been emptied of sludge and this alone should help improve the treatment performance. The plants treatment has been reviewed and the consent holder and WSL have provided a proposed treatment upgrade and a timeframe for this to occur. The upgrade is currently set for the 2025-28 financial years based on current AMP funding.

I recommend an overall site compliance rating of:

Low Risk Non-Compliance

Non-compliance with some of the relevant consent conditions, plan rules, regulations and national environmental standards.

Non-compliance carries a low risk of adverse environmental effects or is technical in nature (e.g. failure to submit a monitoring report).

The consent holder has failed to meet the limits for one determinant (ammoniacal nitrogen) by a small amount on 11.2 g/m³ median as opposed to the median limit of 10g/m³ (11% above). The 90%ile result was 24.9g/m³ as opposed the 90%ile limit of 20g/m³ (20% above), however in both cases the dilution and dispersion that is available when the discharge occurs through a diffuser into the Waikato River is adequate to ensure that no significant adverse effect will occur as a result. The consent holder has undertaken actions such as de-sludging of the ponds to improve performance and has planned an upgrade to the plant as soon as practicable.

6 SUMMARY OF ACTIONS REQUIRED

The following actions are required to be undertaken:

Resource consent	Condition	Action Required
AUTH119647.01.02	6	Undertake upgrade to Huntly WWTP to improve compliance with the ammoniacal nitrogen limit
AUTH119647.01.02	10	Ensure funding is available for the 2024/2025 financial year and that an upgrade occurs and is commissioned by the expiry of this resource consent
AUTH119647.01.02	21	Please submit the required plan as soon as practicable
AUTH119647.01.02	27	Please ensure dive surveys provide the necessary detail to enable an assessment of compliance can be made
AUTH119648.01.01	6	Please review and update the odour management plan to ensure it is still relevant and aligns with the current on site processes.
AUTH119649.01.01	5	Please ensure the dive company inspects the diffuser and reports fully so that compliance can be checked against conditions.
AUTH119649.01.01	6	Please ensure that future dive inspections provide the required information to enable an assessment of compliance to be made.

7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

I recommend the following for the Huntly WWTP

- A Formal Warning is issued for the continued non-compliance at the site and in particular the 2020-21 compliance period.
- The site remains a Focus Area 1 site for the 2021-22 compliance year due to the previous non-compliance and public interest



Edward Prince
**Senior Resource Officer - Infrastructure
 Resource Use**

Date: 16 December 2021

7.1 Decision

I have reviewed this audit report and agree with the recommendations.



Hugh Keane
**Team Leader - Infrastructure
Resource Use**

Date: 16 December 2021

APPENDIX 1
Compliance Rating System

Compliance Status	Compliance Grade
	Not Assessed
	Full Compliance Full compliance with all relevant consent conditions, plan rules, regulations and national environmental standards.
	Low Risk Non-Compliance Non-compliance with some of the relevant consent conditions, plan rules, regulations and national environmental standards. Non-compliance carries a low risk of adverse environmental effects or is technical in nature (e.g. failure to submit a monitoring report).
	Moderate Non-Compliance Non-compliance with most of the relevant consent conditions, plan rules, regulations and national environmental standards, where there are some environmental consequences and/or there is a moderate risk of adverse environmental effects.
	Significant Non-Compliance Non-compliance with many of the relevant consent conditions, plan rules, regulations and national environmental standards, where there are significant environmental consequences and/or a high risk of adverse environmental effects.