

Site Compliance Report

Site No: REG605912
Site Owner: Waikato District Council
Site Name: Raglan Water Supply: Te Hutewai Rd, Raglan
Date: 1 July 2020 to 30 June 2021

1 INTRODUCTION

The following resource consents are held for the site:

Resource Consent	Status	Description	Commenced	Expiry
AUTH118341.01.01	Current	To take water from the Omahina Spring for domestic and municipal water supply purposes	15/01/2009	15/01/2034
AUTH118342.01.01	Current	To take groundwater for domestic & municipal water supply purposes	15/01/2009	15/01/2034

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

2 BACKGROUND

Raglan municipal water take is owned and operated by Waikato District Council on behalf of the ratepayers of the Raglan community. The water take is located on the north eastern side of Mount Karioi and consists of a spring take and a backup groundwater bore.

The bore has not been used during this compliance period, nor in the 2019-2020 compliance period. The spring supply has been providing adequate volumes for community supply even through the drier summer months. The water from the spring is of high quality and requires minimal treatment prior to distribution through the water supply system. Water is filtered, pH balanced and disinfected prior to storage in the distribution reservoir at the top of a nearby hill. From there it is reticulated to the Raglan Township and to another service reservoir.



2.2 PREVIOUS COMPLIANCE HISTORY

Date Period	Site 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	Not assessed

2.3 PREVIOUS COMPLIANCE ISSUES

In the 2019/2020 audit the following issues were identified for action:

Resource consent	Condition Number	Action Required
AUTH118341.01.01	6	Ensure records include the number of hours over which water was taken each day. Remains non-compliant
AUTH118341.01.01	12	Please ensure a minimum of two manual water meter readings are recorded during each calendar year, at least three months apart. This shall be forwarded to Waikato Regional Council within 5 working days of the readings. Remains non-compliant
AUTH118341.01.01	13	Please review and update the water management plan and submit to WRC by June 2021. Compliant
AUTH118341.01.01	14	Please ensure the annual report includes all the required reporting requirements. Remains non-compliant

A Formal Warning was considered for the 2019/2020 compliance year, however following receipt of corrective actions taken to address the exceedance of daily take and the rate of abstraction limits, this was deemed not to be necessary. The 2020/2021 audit has found that several issues are still to be resolved.

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 and monitoring data supplied throughout the compliance period. Some administration, duplicate or irrelevant conditions have been omitted for brevity.

Please note that from 1 July 2021 the wording in Waikato Regional Council audit reports has changed from our previous compliance statuses and are now consistent with the Ministry of Environment compliance guidelines. A description of the classification system used to describe compliance status is given in Appendix 1 of this report.

AUTH118341.01.01 - Surface water take

Activity Authorised: To take water from the Omahina Spring for domestic and municipal water supply purposes	
Condition No.	Description
2	The maximum volume of water taken from the Omahina Spring shall not exceed 3,100 cubic metres in any 24-hour period.
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix A - collected raw data 2020 - 2021 (Doc # 21400592).
Status Reasoning	Actual peak volume of water taken in a 24-hour period was 2,398m ³ .
Action Required	Full Compliance
3	The maximum abstraction rate shall not exceed 42.22 litres per second.
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix A - collected raw data 2020 - 2021 (Doc # 21400592).
Status Reasoning	The consented abstraction rate was exceeded on four occasions during this reporting period. <ul style="list-style-type: none"> • 3/7/20 43.0 L/s • 12/8/20 42.3 L/s • 23/9/20 42.6 L/s • 26/10/20 42.3 L/s. Appendix A confirms that no further exceedances occurred since November 2020. I consider that no further action is necessary.
Action Required	Low Risk Non-Compliance
4	A pulsed water flow meter shall record the quantity of water taken on a cumulative basis. The meter shall have a reliable calibration to water flow and shall be maintained to an accuracy of +/- 5%. Evidence of the meter's calibration to an accuracy of +/- 5% shall be provided to the Waikato Regional Council within six months of the commencement of this consent. Access to the meter shall be provided to Waikato Regional Council staff at all reasonable times.
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix C Calibration Certificates dated 16 June 2020 (Doc # 16980368 and 16979608).
Status Reasoning	Calibration certificates by ABB document that pulsed water flow meter calibration is within +/-1% of their original factory calibration.
Action Required	Full Compliance
5	Calibration of the water measuring devices shall be undertaken by the consent holder at the request of Waikato Regional Council. The calibration shall be undertaken by an independent qualified person and evidence documenting the calibration shall be forwarded to the Waikato Regional Council within one month of the calibration being completed.
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912).

	Appendix C Calibration Certificates dated 16 June 2020 (Doc # 16980368 and 16979608).	
Status Reasoning	<p>Calibration certificates provided in the prior reporting period (2019-2020) .</p> <p>Watercare is currently organising flowmeter verifications for WDC WTPs for September 2021. These will be forwarded to WRC once complete.</p>	
Action Required	Please forward 2021 calibration certificates within one month of completed calibration testing.	Full Compliance
6	The consent holder shall maintain a record of the following: i) The date(s) on which the consent was exercised; ii) The number of hours over which water was taken on that date; iii) The total volume of water taken on a daily basis; These records (electronic copy) shall be forwarded to the Waikato Regional Council by 30 August each year and may be included as part of condition 14 below.	
Evidence	<p>Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912).</p> <p>Appendix A - collected raw data 2020 - 2021 (Doc # 21400592).</p>	
Status Reasoning	<p>Appendix A contains the data records required by condition 6. In respect of condition 6 ii), pump hours from 1/7/2020 to 3/6/2021 were recorded as zero. Hours were recorded intermittently in the period 4/6/2021 to 26/6/2021, before returning to zero for the final three days of the reporting period.</p> <p>Appendix A of the report states:</p> <p><i>WSL Ops team organized contractors to link the Raglan Pump hours in SCADA and Water Outlook. However, the Ops team was facing issues with the setup. The data is available in Water Outlook since June 2021. WSL Ops team is currently investigating the zero-hours recorded in Water Outlook during June 2021 and will be rectified for future reporting.</i></p>	
Action Required	Please ensure this technical issue is rectified for future reporting.	Low Risk Non-Compliance
7	The consent holder shall install and maintain a data logger to continuously record the water level at the upstream base of the weir on a fifteen minute basis when water is being abstracted.	
Evidence	<p>Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912).</p> <p>Appendix A - collected raw data 2020 - 2021 (Doc # 21400592).</p>	
Status Reasoning	Weir level readings have been submitted. Technical issues have prevented accurate reporting on the 27/6, 28/6 and 29/6.	
Action Required		Low Risk Non-Compliance
8	Within three months of the commencement of this consent the consent holder shall submit to the Waikato Regional Council, for its approval, a monitoring programme that documents the methodology that will be applied to assess ecological effects downstream of the Omahina Spring when the water level upstream of the weir (as measured by condition 7) is less than 20 millimetres.	
Evidence		
Status Reasoning		
Action Required		Not assessed
9	When the Omahina Stream water level above the outlet weir is less than 20 millimetres (as measured by consent condition 7 and averaged over a rolling one hour period) the consent holder shall undertake the approved monitoring programme referred to within condition 8 above. A copy of the results of the monitoring programme shall be supplied to the Waikato Regional Council	

	within one month of the implementation and completion of the programme.	
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix A - collected raw data 2020 - 2021 (Doc # 21400592).	
Status Reasoning	The data submitted shows that the Omahina Stream water level above the outlet weir was not less than 20 millimetres over the monitoring period (values reported on the 27/6, 28/6 and 29/6 omitted from evaluation due to identified technical issues).	
Action Required		Full Compliance
10	The consent holder shall ensure weekly manual stream level measurements are recorded approximately 15 metres downstream of the weir for the period of October to May inclusive. This information shall be forwarded to the Waikato Regional Council by 30 August each year.	
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix D Stream Level and Water Meter (Doc # 21552147).	
Status Reasoning	Appendix D details results of weekly manual stream level measurements. Twelve weekly results have been omitted from the data set. Of particular concern, only one manual stream level measurement was made in the month of January and February (12/1/21 and 11/2/21).	
Action Required	WDC staff/contractors need to be aware of the monitoring and data recording requirements of condition 10.	Low Risk Non-Compliance
11	The water flow meter and data logger referred in conditions 4 and 7 shall be linked by telemetry to the Waikato Regional Council within twelve months of the commencement of this consent. As a minimum, daily volume and rate of take shall be telemetered to the Waikato Regional Council specifically daily volume, daily average rate of take and maximum daily rate of take. Until automatic recording (telemetry) is installed and operative the consent holder shall provide to the Waikato Regional Council on a monthly basis, the daily volume taken and average daily abstraction rate (via electronic means).	
Evidence	Data is being telemetered as required by condition 11 (confirmed on Hydrotel 11/8/2021).	
Status Reasoning		
Action Required		Full Compliance
12	The consent holder shall ensure that a minimum of two manual water meter readings are recorded during each calendar year, at least three months apart. This shall be forwarded to the Waikato Regional Council within 5 working days of the readings.	
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix D Stream Level and Water Meter (Doc # 21552147).	
Status Reasoning	Appendix D provides evidence of the required manual water meter readings within the reporting period. The number of manual water meter readings exceeds the requirements of condition 11. However, these need to be forwarded to WRC within 5 working days of the readings.	
Action Required	Please ensure the manual water meter readings are forwarded to WRC within 5 working days of the readings.	Low Risk Non-Compliance
13	By 1 June 2009 the consent holder shall submit a Water Management Plan to the Waikato Regional Council detailing water conservation and efficiency measures that are to be applied to the Supply Scheme to minimise the daily peaks and duration of peak period usage. This plan shall be reviewed and updated on a five yearly basis and provided to the Waikato Regional Council (by 1 June 2014, 1 June 2019, 1 June 2024 and 1 June 2029). The report shall be to a standard	

	<p>acceptable to the Waikato Regional Council. The measures to be detailed shall include as a minimum, but are not limited to, the following; i. Total number of connections on the supply; ii. Current water use; iii. Water use trends over the last 5 years for the Supply; iv. Future demand and rationale for this anticipated demand; v. Details of all the commercial customers that are metered on the supply; vi. Water meter data held by the consent holder for those properties within the supply area that are subject to meters; vii. A review of the water records and data to identify the high use period(s) and high volume users; viii. Restrictions to be implemented over high demand periods including the 1 December to 30 January period e.g. alternate day sprinkler bans, staged restrictions, mains pressure reduction, household sprinkler bans, restrictions on boat washing activities; ix. Education initiatives to be implemented within the Community over the 1 December to 30 January period each year; x. Details of how the education and restriction initiatives are to be implemented e.g. water patrols, surveys, metering, provision of an alternative water source for boat washing activities; xi. Any further initiatives to promote water efficiency; and xii. Initiatives to ensure water use is minimised e.g. alternative options for non-potable uses within households, requirement for dual flush toilet facilities and showerhead restrictions, restriction of supply systems. xiii. Information on how the water take will be managed during times of drought.</p>
Evidence	Waikato District Water Management Plan dated May 2020 -Revision 4 (Doc # 20409280).
Status Reasoning	The updated water management plan was received by WRC in May 2021.
Action Required	Full Compliance
14	<p>The consent holder shall compile an annual monitoring report for the year ending 30 June each year that this consent is current. As a minimum the report shall: i. Include data to demonstrate whether or not compliance with the conditions 2 and 3 of this consent is being achieved; ii. Include all other data and information collected under the conditions of this consent; iii. Critically analyse the information collected in accordance with the conditions of this consent in terms of compliance and actual or potential adverse environmental effects; iv. Make recommendations on the need to undertake mitigation measures to reduce or eliminate any actual or potential adverse environmental effect; v. An annual review of the water records and data to identify the high use period(s) and high volume users; and vi. A summary of the water quality monitoring undertaken associated with the Ministry of Health's drinking water standards. The report shall be to a standard acceptable to the Waikato Regional Council and shall be forwarded to the Regional Council by 30 August for each year that this consent is current.</p>
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912).
Status Reasoning	<p>(i) - Compliant;</p> <p>(ii) - Non Compliant - technical issue preventing consistent reporting of pump hours (refer condition 6 evaluation above), intermittent recording and/or reporting of stream level measurements (refer condition 10 evaluation above);</p> <p>(iii) - Not applicable in the monitoring period;</p> <p>(iv) - Not applicable in the monitoring period;</p> <p>(v) - Compliant</p> <p>(vi) - Compliant.</p>
Action Required	<p>Please address the technical issue impacting the reporting of pump hours. Address inconsistent stream level measurements.</p> <p style="text-align: right;">Low Risk Non-Compliance</p>
15	<p>The Waikato Regional Council may in October or November every fifth year that this consent is current, serve notice on the consent holder under section 128(1) of the Resource Management Act 1991 and commence a review of the conditions of this resource consent for the following purposes: (i) to review the effectiveness of the conditions of this resource consent in avoiding or mitigating any adverse effects on water quality and flow regimes within the stream from the exercise of this resource consent and if necessary to avoid, remedy or mitigate such effects by way of further or amended conditions; or (ii) to review the adequacy of and the necessity for</p>

	monitoring undertaken by the consent holder. Note: Costs associated with any review of the conditions of this resource consent will be recovered from the consent holder in accordance with the provisions of section 36 of the Resource Management Act 1991.
Evidence	
Status Reasoning	
Action Required	Not assessed
16	The Waikato Regional Council may, within the three month period following receipt of the monitoring information required by condition 9 of this consent, serve notice on the consent holder under section 128(1) of the Resource Management Act 1991 and commence a review of the conditions of this resource consent for the purpose of reviewing the necessity for maintaining a minimum water level in the stream, downstream of the water take. Note: Costs associated with any review of the conditions of this resource consent will be recovered from the consent holder in accordance with the provisions of section 36 of the Resource Management Act 1991.
Evidence	
Status Reasoning	
Action Required	Not assessed
Water Regulation 6	Regulation 6: Permit holder must keep records of water taken (1) A permit holder must keep records that provide a continuous measurement of the water taken under a water permit, including water taken in excess of what the permit allows. Form of records (2) The records must comprise measurements (in cubic metres) of the volume of water taken— (a) each day; or (b) each week, but only if the permit holder has approval under regulation 9. (3) The records must be able to be combined to produce further records that cover each water year of the permit. (4) If no water is taken, the records must specify the volume of water taken as zero cubic metres. (5) The records must be kept in a format that, in the opinion of the regional council that granted the permit, is suitable for auditing. Manner in which records kept (6) The records must be kept using a device or system that— (a) measures the volume of water taken— (i) to within $\pm 5\%$ of the actual volume taken, for water taken by a full pipe; or (ii) to within $\pm 10\%$ of the actual volume taken, for water taken by another method (including by an open channel or a partially full pipe); and (b) is able to provide data in a form suitable for electronic storage; and (c) is suited to the qualities of the water it is measuring (such as temperature, algae content, and sediment content); and (d) is sealed and is as tamper-proof as practicable; and (e) is installed— (i) at the location from which the water is taken; or (ii) at the location specified by any approval granted under regulation 10 that is held by the permit holder; and (f) has been verified as accurate in accordance with regulation 7.
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix A - collected raw data 2020 - 2021 (Doc # 21400592).
Status Reasoning	The report demonstrates compliance with Water Regulation 6.
Action Required	Full Compliance
Water Regulation 7	Regulation 7: Verification of device or system (1) This regulation specifies how a device or system that keeps records for a water permit must have been verified as accurate (verified) for the purposes of regulation 6(6)(f). (2) For records provided under regulation 8 for the permit's first water year, the device or system must have been verified before the end of that water year. (3) For records provided under regulation 8 for any later water year, the device or system must have been verified at any time in the 5-year period ending when that water year ends. (4) Verification must have been performed by a person who, in the opinion of the regional council that granted the water permit, is suitably qualified.
Evidence	Refer condition 5 evidence and evaluation reasoning.
Status Reasoning	
Action Required	Full Compliance
Water Regulation 8	Regulation 8: Permit holder must provide records and evidence to regional council (1) A permit

	holder must provide records that cover each water year of the permit to the regional council that granted the permit. (2) The records for a water year must be provided no later than 1 month after the end of the water year. (3) The records must comply with regulation 6. (4) The regional council may request evidence from the permit holder that the device or system that kept the records has been verified as accurate in accordance with regulation 7. (5) The permit holder must provide the regional council with the evidence as soon as practicable after receiving the request. (6) The records or evidence must be provided— (a) in writing; or (b) electronically, if requested by the regional council.	
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912). Appendix A - collected raw data 2020 - 2021 (Doc # 21400592). Appendix D Stream Level and Water Meter (Doc # 21552147).	
Status Reasoning	The report demonstrates compliance with the requirements of Water Regulation 8.	
Action Required		Full Compliance
Authorisation Compliance: Low Risk Non-Compliance		

AUTH118342.01.01 - Ground water take

Activity Authorised: To take groundwater for domestic & municipal water supply purposes		
Condition No.	Description	
1	Groundwater shall be taken in general accordance with the application for this resource consent and as identified in the resource consent conditions below, which shall prevail should any inconsistency between the application and conditions occur.	
Evidence	Raglan Water Supply Operation Annual Report 2020 - 2021 (Doc # 21399912).	
Status Reasoning	The Report states: <i>The groundwater bore has not been in use this reporting period. Therefore, reporting on RC 118342 is redundant for this reporting period. Watercare will investigate and report on the future of this asset.</i>	
Action Required		Not assessed
Authorisation Compliance: Not assessed		

4 SUMMARY OF COMPLIANCE

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

Authorisation	Authorisation Description	Compliance Status
AUTH118341.01.01	To take water from the Omahina Spring for domestic and municipal water supply purposes	Low Risk Non-Compliance
AUTH118342.01.01	To take groundwater for domestic & municipal water supply purposes	Not assessed

Overall Site Compliance: Low Risk Non-Compliance

5 DISCUSSION AND CONCLUSIONS

Waikato District Council (WDC) has made progress to address non-compliances with the conditions of AUTH118341.01.01, as identified in prior audits.

For this 2020/2021 monitoring year WDC has attained a compliance status of Low Risk Non-Compliance. This is due primarily to inconsistent reporting of pump hours, as required by condition 6. Additionally, the consented abstraction rate was exceeded on four occasions during this reporting period.

The number of manual water meter readings exceeds the requirements of condition 11. However, these need to be forwarded to WRC within 5 working days of the readings.

There is also inconsistent reporting of weekly manual stream level measurements. Approximately 12 weekly results have been omitted from the data set in the October 2020 to May 2021 period.

6 SUMMARY OF ACTIONS REQUIRED

The following actions are required to be undertaken:

Resource consent	Condition Number	Action Required
AUTH118341.01.01	5	Please forward 2021 calibration certificates within one month of completed calibration testing.
AUTH118341.01.01	6	Please ensure this technical issue is rectified for future reporting.
AUTH118341.01.01	10	WDC staff/contractors need to be made aware of the monitoring and data recording requirements of condition 10.
AUTH118341.01.01	12	Please ensure the manual water meter readings are forwarded to WRC within 5 working days of the readings.

7 RECOMMENDATIONS FOR WAIKATO REGIONAL COUNCIL

Waikato District Council have attained a compliance status of Low Risk Non-Compliance for the 2020/2021 monitoring year.

This follows three years of attaining Partial Compliance with the surface water take for resource consent AUTH118341.01.01. A **Formal Warning** was considered in the previous compliance year (2019/2020), but was not deemed necessary due to corrective actions undertaken by the consent holder. In light of the continued progress, and the technical nature of many of the non-compliances in the 2020/2021 monitoring year, I do not consider that any formal enforcement action is required.

However, I recommend that this site is audited again in the 2021/2022 year to evaluate whether the remaining identified issues have been addressed.



Brent Vyle
Resource Officer - Resource Use
Resource Use

Date: 11 August 2021

7.1 Decision




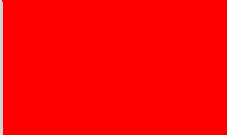
I have reviewed this audit report and agree with the recommendations.



Hugh Keane
Team Leader
Resource Use

Date: 13 August 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.