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Taumata Arowai
Level 2
10 Brandon Street
PO Box 628
Wellington 6140
New Zealand

03 941 8999
53 Hereford Street
Christchurch 8013
PO Box 73013
Christchurch 8154

ccc.govt.nz

Email: korero@taumataarowai.govt.nz

Christchurch City Council submission on the proposed National Wastewater Environmental Performance Standards

Introduction

1. Christchurch City Council (the Council) welcomes the opportunity to provide feedback on the *proposed National Wastewater Environmental Performance Standards* (NWEPS) developed by Taumata Arowai.
2. We support the overall intent of establishing clear, nationally consistent environmental performance expectations for wastewater, and acknowledge the value of aligning discharge regulation under a single national framework. However, our submission raises concerns regarding scope, implementation, and clarity, particularly when considered in the broader context of the *Local Government (Water Services) Bill* (the Bill), which will give these standards legal effect.
3. While the Bill is not part of this consultation, it is fundamental to how the standards will operate. In particular, the Bill:
 - Introduces a 35-year consenting pathway for activities compliant with the standards;
 - Prohibits regional councils from imposing more stringent discharge conditions for matters covered by the standards (Section 58JA);
 - Removes Te Mana o te Wai as a statutory objective for Taumata Arowai.
4. These changes mark a significant shift in the way wastewater is regulated. For this reason, our submission not only provides technical feedback on the standards themselves, but also outlines a series of policy-level considerations to ensure the framework is workable, future-fit, and responsive to local values and environmental risk.

Submission

Technical Feedback

5. Our technical feedback is attached in **Attachment One**.
6. The technical component of this submission provides the Council's operational response to the proposed standards. It reflects input from our engineering, infrastructure, and compliance teams, drawing on direct experience managing one of New Zealand's largest municipal wastewater systems.

7. Overall, the Council supports the move toward nationally consistent discharge standards. However, the attached technical submission outlines a range of practical concerns and recommended improvements, particularly around scope, consent alignment, monitoring expectations, and implementation feasibility. These suggestions aim to improve clarity, reduce unintended consenting burdens, and support the effective, consistent application of the standards nationwide.

Policy Feedback

8. In addition to the technical and operational feedback provided, the Council raises the following policy considerations. These issues relate to the implementation and long-term functioning of the proposed standards, particularly when viewed alongside the legislative changes introduced through the Bill.

Maximum Enforceable Standards

9. The Bill confirms that the proposed standards will become the maximum enforceable limits for regional councils. While the Council may choose to exceed the standards through investment or design, this ability is not explicitly acknowledged in the consultation material.
10. We seek confirmation that councils can continue to voluntarily apply higher treatment standards where this reflects community expectations, environmental values, or mana whenua priorities.

Land Use Consents

11. The standards do not override land use planning rules. In Canterbury, Environment Canterbury currently applies planning provisions that require land use consents for wastewater infrastructure, sometimes as non-complying activities. This risks undermining the certainty intended by the national framework.
12. We recommend clear national direction that wastewater infrastructure, including collection, pumping, and reticulation, should not be subject to additional land use barriers if discharge standards are met.

Emerging Contaminants and Heavy Metals

13. Emerging contaminants such as PFAS, pharmaceuticals, and microplastics as well as heavy metals are excluded from this phase. Their management has been left to regional discretion, which reintroduces complexity, regional inconsistency, and a potential dual regulatory function.
14. We recommend a formal national review cycle and progressive inclusion of these contaminants in future updates, supported by a transparent evidence and consultation process.

Overflows as Controlled Activities

15. We support the proposal to treat wastewater overflows as controlled activities. However, response and reporting expectations must be proportionate and feasible, particularly in storm events or for small or rural networks.

Odour and Air Discharges

16. Odour remains a frequent concern for urban communities, yet air discharges are not addressed in this phase. We recommend the immediate inclusion of a simple odour

performance standard and associated best-practice guidance, rather than deferring this to a future phase.

Te Mana o te Wai

17. The removal of Te Mana o te Wai from Taumata Arowai's statutory objectives risks weakening the role of iwi and hapū in shaping water regulation and policy. In the Council's submission on the *Local Government (Water Services) Bill*, we recommended that Te Mana o te Wai principles be reinstated.
18. If that recommendation is not adopted, we strongly recommend that future development of wastewater standards include a formal engagement and co-design process with mana whenua, and that mātauranga Māori is meaningfully incorporated into how environmental outcomes are defined, monitored, and assessed.

Conclusion

19. Christchurch City Council is supportive of national consistency in wastewater regulation. However, that consistency must not come at the expense of environmental protection, regional responsiveness, or Treaty-aligned partnership.
20. We welcome continued engagement as the standards and supporting legislation progress, and remain committed to delivering high-quality wastewater services in a way that meets both national expectations and the values of our communities.

Thank you for the opportunity to provide this submission.

For any clarification on points within this submission please contact Luke Adams, Principal Advisor Strategic Policy – luke.adams@ccc.govt.nz

Ngā mihi,



Pauline Cotter
Deputy Mayor of Christchurch