13 October 2026

Water Services Authority – Taumata Arowai
PO Box 628
Wellington 6140

Submitted electronically via website

Tēnā koutou

Submission on the proposed Wastewater Environmental Performance Standards – tranche two

Kāpiti Coast District Council, Te Kaunihera o Kāpiti, welcomes the opportunity to provide feedback on the proposed second tranche of Wastewater Environmental Performance Standards (WEPS) relating to odour from discharges to air and metals in discharges of treated wastewater.

Council supports the intent of establishing nationally consistent and risk-proportionate requirements that protect environmental and public-health outcomes while reducing duplication, uncertainty, and unnecessary consenting costs.

Overall, Council supports the proposed risk-based approach to metals and odour management. This letter briefly summarises the key points of our submission against the key questions in the Discussion Document and summarises our overarching recommendations.

This letter outlines our feedback at a high level and the attached detailed submission identifies matters of detail that would improve the clarity, practicality and consistent implementation of the proposed standards.

Proposed standard for metals in discharges to water

Consultation question: Do you consider the proposed metals standard clear, practical and proportionate for wastewater treatment plants with different risk profiles?

Council supports the proposed risk-based metals standards, including proportionate controls, moderated copper and zinc limits for low and very low dilution freshwater environments, and a national baseline that should reduce the cost and duration of consenting. The Paraparaumu

Wastewater Treatment Plant (PWWTP) monitoring data for 2021–24 indicates likely compliance with the seven proposed dissolved-metals limits for which data are available. Dissolved aluminium remains a data gap and Council's support is conditional on compliance with that limit.

However, to improve workability, Council seeks clear national guidance on detection limits and the treatment of non-detects, aluminium transition arrangements, percentile calculations and data sufficiency, transparent risk classification, and recognition of trade waste source controls.

Council **recommends**:

- retaining the proposed risk-based framework for metals and odour;
- clarifying dissolved metals monitoring, laboratory detection limits, sampling requirements and the treatment of historical total metals data.

Proposed standard for discharges to air (odour) and other airborne matters

Consultation question: Do you consider the proposed discharge to air standard clear, practical and proportionate for wastewater treatment plants with different risk profiles?

Council supports the proposed risk-based odour framework and national minimum requirements, which are already substantially reflected in our existing consent conditions and operational practices.

Council's principal concern is that the proposed framework excludes spray drift from the discharge to air standard on the basis that it is managed through discharge to land provisions. However, it is unclear how this will occur in practice. Council considers that spray drift is fundamentally an airborne effect and seeks clarification regarding the appropriate assessment pathway. Council supports the development of nationally consistent guidance and recognised management plan pathways to reduce uncertainty, cost and inconsistent treatment between regions.

Our experience at the Ōtaki Wastewater Treatment Plant (Ōtaki WWTP) shows that the lack of a national framework can add cost, delay, and uncertainty to consent processes despite evidence that off-site microbial risk is very low. Council believes that spray drift can be best managed as a discharge to air using published guidance and recognised management plan pathways. This will promote consistency between regions and reduce the need for bespoke assessment.

Council **recommends**:

- retaining the proposed risk-based odour management framework and minimum requirements for odour control;
- clarifying how spray drift will be managed under the proposed framework and providing nationally consistent guidance, assessment methodologies and recognised management plan pathways.

Implementation, transition and workability

Council would like to see this second tranche of standards applied prospectively to avoid disrupting existing consenting processes. A lead in time of at least twelve months should be provided before monitoring requirements come into force.

As the Standards are given effect through resource consent conditions set by regional councils, Council requests that implementation is accompanied by guidance and model consent conditions to support consistency across regional councils.

Council **recommends**:

- a suitable transition period of at least twelve months is provided for implementation;
- the proposed Standards can apply to resource consent applications that are already in progress, in a manner that is consistent with the approach taken for the first tranche of WEPS;
- guidance and model consenting conditions are provided by Taumata Arowai to support consistent implementation across regions.

Further discussion

Council would welcome the opportunity to discuss its submission further or to provide additional information, including the underlying metals-monitoring dataset and details of the spray drift management approach developed for the Ōtaki Wastewater Treatment Plant.

For technical enquiries regarding this submission, please contact Ramesh Pillai, Manager Water and Wastewater Services, on 04 296 4731 or at ramesh.pillai@kapiticoast.govt.nz.

Ngā mihi



Darren Edwards
Chief Executive
Kāpiti Coast District Council | Te Kaunihera o Kāpiti

Attachment: Kāpiti Coast District Council submission on the proposed Wastewater Environmental Performance Standards – tranche two

FORMAL SUBMISSION

Submission on the proposed wastewater environmental performance standards – tranche 2

Discharges to air (odour) and metals in discharges of treated wastewater to water

Submitted to the Water Services Authority – Taumata Arowai

Kāpiti Coast District Council | Te Kaunihera o Kāpiti

22 October 2026

Table of contents

1. Executive summary 6
2. Purpose 6
3. Background – Council's wastewater context 7
3.1 Paraparaumu WWTP 7
3.2 Ōtaki WWTP 7
4. Proposed standard for metals in discharges to water 8
4.1 Council supports the proposed approach 8
4.2 Council's monitoring evidence 8
4.3 Matters Council asks the Authority to address 9
5. Proposed standard for discharges to air (odour) 11
5.1 Council supports the proposed framework 11
5.2 Other airborne matters 11
6. Implementation, transition and workability 12
6.1 Interaction with reconsenting already underway 12
6.2 Lead-in period and cost 12
6.3 Consistency of implementation by regional councils 12
6.4 Te Mana o te Wai and mana whenua interests 12
7. Recommendations 12
8. Publication and contact details 13
Appendix One: Basis of the metals assessment 14

1. Executive summary

Kāpiti Coast District Council (Council) supports the intent of the proposed second tranche of wastewater environmental performance standards (the proposed Standards). A nationally consistent, risk-proportionate framework for odour and metals would reduce duplication, cost and uncertainty in consenting and support the objectives of Local Water Done Well and the Water Services Act 2021. This submission is informed by Council's experience at the Paraparaumu Wastewater Treatment Plant (PWWTP), which discharges to a very low dilution freshwater environment and is currently being reconsented, and the Ōtaki Wastewater Treatment Plant (Ōtaki WWTP), which discharges to land through a land discharge and treatment area (LDTA).

Council's position in summary:

- Metals – supported in part. Analysis of PWWTP effluent monitoring from 2021-2025 indicates that the discharge is likely to comply with all proposed dissolved metals limits for which monitoring data are available. Dissolved aluminium has not historically been monitored at the PWWTP effluent compliance point and therefore this limit cannot yet be supported.
- Metals – matters requiring clarification. Council seeks a lead-in period to establish a baseline and guidance on monitoring requirements, particularly with regards to dissolved aluminium, as well guidance regarding treatment of detection limits, and annual percentile calculation.
- Odour – supported in principle. Neither of Council's plants has a current odour issue. The proposed minimum requirements largely reflect obligations already imposed through consent conditions. Council supports risk-based escalation of requirements for medium and high-risk plants.
- Odour – spray drift gap. Council does not support the express exclusion of spray drift from the discharge to air standard on the basis that it is managed through the discharge to land standards. Spray drift is a discharge to air effect. Council seeks clarification as to how spray drift effects are intended to be addressed under the proposed framework. If spray drift is not to be managed through the discharge-to-air standard, Council recommends that guidance clearly identify the appropriate assessment pathway and provide a nationally consistent approach to assessment and management.
- Implementation. Council requests that the proposed Standards can apply to resource consent applications that are already in progress, in a manner that is consistent with the WEPS (first tranche).

2. Purpose

This submission responds to the Water Services Authority – Taumata Arowai (the Authority) discussion document released on 10 September 2026 on the proposed second tranche of wastewater environmental performance standards. The proposals address odour from discharges to air from wastewater treatment plants and metals in discharges of treated wastewater to water. Submissions close at 17:00 on 22 October 2026.

Council previously submitted on the first tranche of proposed wastewater environmental performance standards in April 2025 and on the National Engineering Design Standards in September 2026. The positions in this submission are consistent with Council's earlier support for nationally consistent, risk-based requirements that are practical to implement and proportionate to environmental and public-health risk.

3. Background – Council's wastewater context

3.1 Paraparaumu WWTP

The PWWTP serves the Waikanae, Paraparaumu and Raumati communities. It is a biological nutrient removal plant with UV disinfection and treats approximately 10–12 million litres per day. Treated wastewater is discharged to the Mazengarb Drain, which drains to the Waikanae Estuary. The discharge is classified as being to a very low dilution freshwater environment, and for much of the year comprises most of the flow in the upper reaches of the drain.

Council lodged a replacement resource consent application with Greater Wellington Regional Council in December 2021. That application is on hold while Council assesses whether to continue with it or to lodge a new application under the wastewater standards. Council monitoring indicates the plant complies with all current WEPS limits except for total nitrogen and total suspended solids, for which an upgrade pathway is being developed.

3.2 Ōtaki WWTP

The Ōtaki WWTP discharges treated wastewater to land via an LDTA adjacent to the Ōtaki River. Council is upgrading the irrigation system from direct lateral discharge to sprinkler discharge to improve distribution across the LDTA. The change in discharge method raised spray drift as a consenting matter, which has been assessed by air quality specialists and is proposed to be managed through a Spray Drift Management Plan covering sprinkler design and discharge height, wind shutdown criteria, wind monitoring and records, hydraulic loading, visual and water sensitive paper monitoring, equipment maintenance, perimeter planting, adaptive management, and incident and complaint procedures.

Council's experience at this site is the primary basis for its submission on spray drift below.

4. Proposed standard for metals in discharges to water

4.1 Council supports the proposed approach

Consultation question: Do you consider the proposed metals standard clear, practical and proportionate for wastewater treatment plants with different risk profiles?

Council supports the proposed risk-based structure, under which the level of control is matched to the combination of discharge risk and receiving environment risk, with lower risk plants able to rely on surrogate measures such as total suspended solids and informational monitoring, and specified limits applying only where both discharge risk and receiving environment risk are high.

Council also supports the moderation of the copper and zinc values for low and very low dilution freshwater on the basis that the strictest derived values may be difficult or costly to achieve with existing treatment technology. This is a pragmatic recognition of technological limits and of affordability for ratepayers and is consistent with the proportionality objective of the standards.

Council supports the inclusion of metals in the standards rather than leaving them to case-by-case resource consent processes. Metals continue to be a contested technical matter in the processing of Council's PWWTP application, and a national baseline would materially reduce the cost and duration of consenting for plants in Council's position.

4.2 Council's monitoring evidence

Council has assessed 4-years of recent dissolved metals data for PWWTP effluent against the proposed limits for very low dilution freshwater environments. Available monitoring data indicate that the discharge is likely to comply with all proposed dissolved metals limits for which data are available.

Dissolved aluminium has not historically been monitored at the PWWTP effluent discharge point and remains the principal data gap. Council's support is therefore conditional upon compliance with the aluminium limit. Council has started monitoring dissolved aluminium in the discharge to develop an evidence base for future compliance.

Metal	Current consent limit (g/m³)	Proposed WEPS limit – very low dilution freshwater (mg/L)	PWWTP 90th percentile, dissolved (mg/L) 2021–24	PWWTP 90th percentile, dissolved, as a % of limit	Assessment
Aluminium	N/A	0.1375	N/A	N/A	Unknown
Arsenic	0.010	0.0325	0.000606	1.9%	Complies
Cadmium	0.004	0.0003	0.000009	3.1%	Complies
Chromium	0.010	0.0025	0.000487	19.5%	Complies
Copper	0.010	0.0118	0.002284	19.4%	Complies
Lead	0.010	0.005	0.000328	6.6%	Complies

Metal	Current consent limit (g/m³)	Proposed WEPS limit – very low dilution freshwater (mg/L)	PWWTP 90th percentile, dissolved (mg/L) 2021–24	PWWTP 90th percentile, dissolved, as a % of limit	Assessment
Mercury	0.0002	0.0015	0.000005	0.3%	Complies
Nickel	0.100	0.0275	0.000755	2.7%	Complies
Zinc	0.100	0.1025	0.028356	27.7%	Complies

Notes on the assessment:

- Several results sit at or near the laboratory limit of detection, in particular dissolved cadmium and mercury. The 90th percentile values for those metals are therefore reporting artefacts of the detection limit rather than measured concentrations.
- Weekly metals sampling was undertaken from 2021 to December 2025, originally to investigate the effect of Otaihanga landfill leachate entering the plant. Weekly sampling was discontinued on cost grounds, at approximately $900–$1,000 per sampling round. Council is reinstating quarterly influent and effluent metals monitoring in conjunction with the Otaihanga landfill sampling programme.
- Aluminium was not included in the historical testing programme. Council is adding total and dissolved aluminium to the September 2026 sampling round so that an evidence base is established ahead of any limit taking effect.

4.3 Matters Council asks the Authority to address

While Council supports the proposals, the following matters would materially improve workability:

- Detection limits. For dissolved cadmium and mercury, the proposed limits approach standard commercial laboratory detection limits. The Authority should specify required detection limits and the treatment of non-detect results in percentile calculations, so that compliance is assessed consistently across operators and laboratories.
- Dissolved aluminium. Council supports inclusion of dissolved aluminium in principle. However, dissolved aluminium is not commonly included in historical wastewater monitoring programmes and Council has not previously monitored dissolved aluminium at the PWWTP effluent compliance point. A lead-in period is therefore required to establish a representative baseline and assess compliance implications before any enforceable limit takes effect.
- Percentile basis and data sufficiency. The Authority should confirm the minimum number of samples per year required to calculate a valid annual 90th percentile, and how compliance is assessed where monitoring frequency changes during a consent term. The Authority should also provide guidance on how much data is required to demonstrate compliance prior to seeking resource consent.

- Risk classification transparency. The method by which discharge risk and receiving environment risk are assigned, and the process for review of that classification, should be published so operators can plan and budget with certainty.
- Relationship to trade waste. Metals loads are strongly influenced by trade waste inputs. The Authority should confirm how source control through trade waste bylaws and consents is recognised in the risk assessment and in compliance pathways.

5. Proposed standard for discharges to air (odour)

5.1 Council supports the proposed framework

Consultation question: Do you consider the proposed discharge to air standard clear, practical and proportionate for wastewater treatment plants with different risk profiles?

Council supports the proposed framework, under which plants are classified by risk and the level of control is matched to that risk. Council agrees that odour can have a significant effect on people's use and enjoyment of homes, marae, schools, parks and other community spaces, and that a national approach makes expectations clearer for communities, councils and operators.

The proposed minimum requirements – odour management, complaints recording, regular site inspections, staff training, equipment maintenance and annual reporting – are already substantially met by Council through existing resource consent conditions and operational practice. Council therefore does not anticipate material additional cost in meeting the minimum requirements and supports them being applied nationally as a baseline.

Neither the PWWTP nor the Ōtaki WWTP currently has an odour issue. Council's comments on this standard are accordingly directed at clarity and workability rather than at the stringency of the requirements.

5.2 Other airborne matters

Consultation question: Should other airborne matters, such as dust from treatment processes, be included in the proposed discharge to air standard?

The proposed discharge to air standard expressly excludes spray drift, on the basis that spray drift is managed through the discharge to land standards. Council does not consider that position to be correct in practice. Spray drift is an airborne discharge and is assessed as a discharge to air effect: the relevant variables are release height, droplet size, wind speed and direction, and the microbial quality of the effluent, and the relevant effects are on people and property beyond the site boundary. Managing it under a discharge to land standard directed at soil and groundwater outcomes leaves a regulatory gap.

Council has direct experience of the consequences. Progressing upgrades to the Ōtaki WWTP LDTA has been protracted in significant part because spray drift is assessed on a bespoke, site-by-site basis with no national reference point. A specialist air quality assessment for the site concluded that at release heights of up to one metre most droplets and aerosols deposit within 10–20 metres of the discharge, that at the wind speeds predominantly anticipated at the site aerosols are unlikely to be transported beyond the site boundary, and that any aerosols so transported are very unlikely to contain pathogenic microbes. Notwithstanding that evidence, the absence of a national framework has added cost, time and uncertainty.

Council recognises the risk that a poorly calibrated spray drift standard could be onerous for land discharge plants, including Ōtaki. Council seeks clarification as to how spray drift effects are intended to be addressed under the proposed framework. If spray drift is not to be managed through the discharge-to-air standard, Council recommends that guidance clearly identify the appropriate assessment pathway and provide a nationally consistent approach to

assessment and management. Rather than establishing numeric national limits, Council recommends publication of guidance and recognised management-plan pathways to promote consistency between regions and reduce the need for bespoke assessment. Council believes that the current ambiguity leaves operators still having to work through air discharge consent requirements beyond what's covered by the current WEPS and tranche 2.

6. Implementation, transition and workability

The Authority has invited general feedback on the workability of the wastewater standards. Council raises the following matters.

6.1 Interaction with reconsenting already underway

Council's PWWTP replacement application has been lodged and is on hold while Council decides whether to continue with it or lodge under the wastewater standards. Several other operators are in a comparable position. Council requests that the proposed Standards can apply to resource consent applications that are already in progress, in a manner that is consistent with the approach taken for WEPS (first tranche). Where new metals monitoring is required, Council requests that an applicant be able to satisfy the requirement through a monitoring and improvement condition rather than through pre-application data that cannot practicably be generated within the consenting timeframe.

6.2 Lead-in period and cost

Changes to monitoring suites, analytical methods and laboratory contracts take time and money to implement and must be reflected in long-term plan budgets. Council requests clarification regarding the amount of data required to demonstrate compliance with the new Standards for heavy metals. In particular, as Council is going through a reconsenting process, Council would like to ability to rely on the new standards throughout this process, even where a dataset may be incomplete at the time of application (e.g. for dissolved aluminium). Council suggests a pragmatic approach might be to provide a lead-in time for developing datasets.

6.3 Consistency of implementation by regional councils

The standards are given effect through resource consent conditions set by regional councils. Council requests that the Authority issue implementation guidance, including model consent conditions for odour management and metals monitoring, to reduce the risk of divergent interpretation between regions that would erode the national consistency the standards are intended to deliver. This request also applies to the WEPs that have already been enacted.

6.4 Te Mana o te Wai and mana whenua interests

Cultural values are central to discharges from both the PWWTP and OWWTP. Council supports the standards expressly recognising that a national baseline does not displace Te Mana o te Wai or the ability of mana whenua to seek additional site-specific outcomes through the consenting process and asks that guidance make that relationship explicit.

7. Recommendations

Council recommends that the Authority:

R1. Proceed with a risk-based national standard for metals in discharges to water, retaining the moderated copper and zinc values for low and very low dilution freshwater environments.

R2. Confirm how historical total metals monitoring may be used as supporting evidence and provide a defined transition to dissolved metals monitoring.

R3. Specify required laboratory detection limits, the treatment of non-detect results in percentile calculations, and the minimum sampling frequency for a valid annual 90th percentile.

R4. Provide a lead-in period for dissolved aluminium monitoring and guidance on accounting for aluminium dosing used in phosphorus removal.

R5. Publish the method for assigning discharge risk and receiving environment risk, and the process for reviewing a classification.

R6. Confirm how trade waste source control is recognised in the metals risk assessment and compliance pathway.

R7. Proceed with the proposed risk-based odour management framework and minimum requirements.

R8. Clarify how spray drift effects are intended to be addressed under the proposed framework, such as national guidance, accepted risk assessment methodologies and management-plan pathways to promote consistent treatment by regional councils, rather than relying solely on bespoke site-by-site assessment.

R9. Apply proposed Standards to resource consent applications that are already in progress, in a manner that is consistent with the approach taken for the WEPS (first tranche). Provide clarification regarding the amount of data required and frequency of dataset to demonstrate compliance with the standards.

R10. Make explicit in guidance that the standards provide a national baseline and do not displace Te Mana o te Wai or site-specific outcomes sought by mana whenua.

8. Publication and contact details

Council consents to this submission being published.

Submission contact: Ramesh Pillai, Manager Water and Wastewater Services | Te Kaiwhakahaere Ratonga Wai me te Parakaingaki, Kāpiti Coast District Council | Te Kaunihera o Kāpiti; 04 296 4731; ramesh.pillai@kapiticoast.govt.nz.

Appendix One: Basis of the metals assessment

The assessment in section 4.2 is based on Paraparaumu WWTP effluent monitoring undertaken by Council's laboratory between November 2021 and March 2024, comprising approximately 130 sampling rounds analysed for arsenic, boron, cadmium, chromium, copper, lead, manganese, mercury, nickel and zinc as total metals. Maximum and 90th percentile values were calculated across the full record and compared against the proposed limits for very low dilution freshwater environments.

Limitations of the assessment:

- Sampling was not evenly distributed across each calendar year, so the calculated 90th percentile is an indicative record-wide value rather than a compliance calculation on an annual basis.
- Results at or below the laboratory limit of detection have been included at the reported detection limit value.
- Aluminium is not included because it was not part of the historical monitoring suite. Total and dissolved aluminium are being added from the September 2026 sampling round.

Council would be pleased to provide the underlying dataset to the Authority on request.