

31 March 2017

Nick Walmsley
Water New Zealand
Level 12
PO Box 1316
Wellington 6140

Sent By Email:
nick.walmsley@waternz.org.nz

Dear Nick Walmsley

Western Bay of Plenty District Council Comments on Draft Beneficial Use of Organic Waste Products on Land Guidelines

Thank you for overseeing the review of the guide, and for the opportunity to submit the following comments. Please note, they do not consider the technical support information document.

The guide review is an important document for the Western Bay of Plenty District Council (WBOPDC), primarily with regards to managing municipal bio-product. WBOPDC is supportive of the review and looks forward to further review opportunities as feedback on the changes bring to light new information.

Having attended the meeting held in Hamilton, on 21 February 2017, it was beneficial to consider the varied responses from different areas of the industry. We were there to consider the changes in respect to general solid waste management, our own application of human bio-product to land, and general organic waste management within our District.

Summary of key comments:

- It is evident the locus of control of the guide, and its review, are important considerations that need to be resolved in terms of who is responsible for the long term delivery of the guide and future iterations.

In the absence of any directive or funding from Central Government - one model that may be considered is a user pays/levy option; whereby the use and application of the standard and subsequent reviews of the guide see ALL stakeholders contribute financially to administer and advance its management for the future benefit of New Zealand.

- WBOPDC recognises there is an industry preference to use 'bio-product' nomenclature over any reference to 'waste' and agree this is also relevant to the incorporation of it's green waste management into similar land application operations in future.

There is a concern such a change will make the source of any human waste product less transparent with respects to monitoring and avoiding entry to the food chain.

A2874046



- We also recommend retaining the existing grading nomenclature; such changes seem superficial where considering the above specifically with respects to human bio-product processing.
- WBOPDC recognises the importance of monitoring emerging contaminants, due to the unknown effect they may have on the environment, and recognise the need for a robust monitoring system.

The potential addition of emergent contaminants is an important factor in our operational capacity to maintain long term land application. This is due to the unknown costs for lab analysis and run on effect to rate payers.


The resulting need to also establish a database to record such contaminants, and the uncertainty surrounding any actual requirements under an existing or future consent, would further add to these costs.

Therefore, WBOPDC believes further investigation on the financial impact and capacity of NZ based laboratories to be able to manage such testing would be recommended in addition to any further costs associated with managing the data.

WBOPDC look forward to further opportunities to meet and review the results of this round of commentary with Water NZ and the Steering Group to further ensure effective and achievable guidelines continue to remain in place.

If you have any queries relating to the above, please do not hesitate to contact me, by phone, on 07 571 8008 during business hours.

Kind Regards



Kelvin Hill
Utilities Manager



Trent Deakin
Technical Support Project Engineer

Item commented on	WBOPDC comment
<p>Use of the 'Waste' nomenclature and distinction between human and non-human waste</p>	<p>'Waste' should be avoided in nomenclature, where specifying non animal product the preference would be to use human bio-product</p> <ul style="list-style-type: none"> - We are predominantly an end user managing human waste so the limitations around how the product can be used are already restricted. From an MfE context, it is still a real concern that not referring to it as human waste may provide avenues for this product to inadvertently enter the food chain. - In a utilities context, we apply organic product of human origin to land. The inclusion of animal bio-products into the guide allowances sits outside our own end use as a local body therefore in principle have no direct objection to this change. - As a local authority we would be also be interested in relevant records of disposal related to primary industry, to allow the monitoring of trade waste components, linked to any discharge consents and how the product is disposed of. Therefore some oversight as a local authority would need to make use of any bio-product database developments both as a consent holder and for consent adherence.
<p>Grading system nomenclature</p>	<p>Our preference would be to retain the existing system to remain consistent with existing practises</p> <ul style="list-style-type: none"> - We consider a consistent nomenclature will allow us to maintain a clear and consistent track record of the grade of Bb product we are applying to land. - It is a concern that a change to the grade system could provide confusion either when resource consents catch up to the guideline changes, or when consent controllers apply the rulesets to grading when checking it against what has been applied to land historically. - We recognise however, such a change could be made with appropriate training, legislative updates to definitions, and pollution control monitors, but we do not see any real benefit to changing the label system.

Nitrogen & Metal contaminants loadings	<p>We agree that N loading is a good base line to calculate loading rates for land application</p> <ul style="list-style-type: none"> - We are pleased no changes are proposed here and that the N loading is being considered. Any restrictions to the minimum limits will affect land application capabilities directly, particularly where contaminant levels are tightened. The available land and associated costs to manage such changes would increase. - What is not consistent is monitoring requirements for Phosphates applied to land. While mineralisation and soil incorporation of Phosphates fits inside the Nitrogen levels, consent requirements can be unclear on the level of reporting for Phosphates – including it in the concentration limit tables seems a reasonable practice.
Protection of water supply and aquifers	<p>Better understanding of links to water supply and aquifers and the proximity to public and private bores</p> <ul style="list-style-type: none"> - Reciprocal knowledge and an understanding of the locality of bores relative to disposal areas would be worthwhile, while included in the resource consent documentation it would be good practice for regional bodies to notify consent holders of new bores, particularly if they are to be added to the same catchment or water take.
Emerging Contaminants and Lab Analysis	<p>Testing should not be mandatory, however we recognise it is likely to be best practice to at least benchmark an initial record of the land being used for future reference.</p> <ul style="list-style-type: none"> - It currently costs \$1,500+GST per test for Dioxins and while it is referred to in the guide, our current resource consent does not require this to be tested for. If it became mandatory to test, the increased costs would negatively effect the cost/benefit for land application <ul style="list-style-type: none"> o Providing a baseline record is a good practice, but once established, particularly on historically banned contaminants, we believe dropping the need to monitor historic toxins is logical – dropping the need to continually monitor dioxins is a good example of this;

	<ul style="list-style-type: none"> ○ Regarding the inclusion of new contaminants, if adopted, we would suggest a gradual voluntary opt in to any database or establishment to initial monitoring regime. ○ In our situation, this would include a composite soil test and composite sludge sample to be a minimum best practice. - To meet any resulting consent conditions, we would also suggest requirements consider whether such tests can in fact be made in NZ labs to reduce the cost, and logistical issues in providing valid samples: <ul style="list-style-type: none"> ○ Some consistency in the lab analysis component to ascertain the real costs of monitoring such contaminants would be recommended; ○ We would consider a database of any bio-product activities to be good practice. Currently we are required to maintain our own records and present them when required to a regional authority, however, if a central database was available this would enable all stakeholders with access to review as required; ○ The primary use of any such database would be to retain an accurate record of the origin, destination, determinant levels of product recorded and required by consent.
<p>Guide Structure and practical guidance at operational levels of land application</p>	<p>Having the guide broken into two sections is reasonable but further consistency through the provision of exemplars relevant to a given activity would also provide an avenue for peer review, and for central, regional and local agencies to benchmark relevant activities across NZ</p> <ul style="list-style-type: none"> - Practical guidance on land application is only outlined in this document; - Further guidance on H&S considerations with respects to handling human bio-products is suggested; as a PCBU a minimum recommended immunisation regime may include Tetanus and Hepatitis A & B.

Central database management	<p>WBOPDC see the advantages of a database managed centrally and would generally support further development</p> <ul style="list-style-type: none"> - Sale of land in the future and noting application to land locations on the property file is an internal process but oversight at a national level is considered a good practice; - To align with regional or district plans in terms of land use; - Would be inclined to join if a relevant and consistent records management system was applied nationally.
Table 5-6 Common production practices	<p>Consideration and potential inclusion of dewatering processes on pathogen reduction, stabilisation and VAR matters where temporary / practical storage of solids prior to disposal to land – particularly with reference to dewatering such as a screw-press or similar dewatering plant operations.</p> <ul style="list-style-type: none"> - This may be relevant where operations include the use of a holding area for bio-solids processed in this manner destined for later disposal to land; - Consideration on the volume of polymer dosing is also likely relevant to the previously mentioned contaminant loading.