

National wastewater environmental performance standards

Report on engagement

November 2025



Water Services Authority
Taumata Arowai

Executive summary

This report highlights the technical input and the public, iwi/hapū and stakeholder engagement activities carried out to inform the development of New Zealand's first national environmental performance standards for wastewater ("wastewater standards").

It reflects the Water Services Authority's (the Authority) commitment to transparency, sector collaboration and evidence-based regulation.

The Water Services Act 2021 sets out the mandate for establishing standards and prescribes a formal consultation process.

To develop the proposals for consultation, the Authority commissioned technical advice to understand the current state of wastewater treatment as well as economic, environmental and cultural dimensions of wastewater management in New Zealand. In particular, case studies and reports developed with and by iwi and hapū offered deep insights into mātauranga Māori and te ao Māori perspectives. For each of the case studies, the Authority also engaged with the relevant councils (both consent holders and consenting authorities) to understand broader perspectives. All reports are available on our website.

In addition, the Authority established a technical review group, bringing together expertise from across the sector – including regional and territorial authorities, the private sector, Water New Zealand, the Authority's Board, and its Māori Advisory Group (Te Puna). This group provided critical cross-sectoral advice on the feasibility, clarity and integrity of the proposed standards.

Formal consultation was based on a discussion document and sought written feedback. During the consultation, the Authority hosted 17 targeted webinars and Q&A sessions for key audiences such as network operators, consenting authorities, iwi and hapū. The eight-week public consultation process resulted in 151 submissions, including a strong response from iwi and hapū. Targeted stakeholder meetings further supported the consultation process.

There was broad support, especially from local government and industry, for establishing national standards to improve consistency and regulatory certainty. However, many submitters called for stronger environmental protections, clearer implementation guidance and fewer exceptions. Common themes included the need for more stringent limits, proportionate monitoring requirements and expanded standards to cover discharges to air, heavy metals and emerging contaminants.

Input from iwi and hapū emphasised the significant implications of the standards for freshwater environments and mahinga kai. Iwi expressed a strong preference for continuing with the site-specific approach to consenting wastewater treatment plants, and opposition to continuing discharge to water. There were higher levels of support for land-based discharge options that protect culturally and ecologically significant waterways. Iwi and hapū also called for more active partnership in the design, consenting and implementation of standards particularly in the Waikato-Waipā and Whanganui River catchments.

The engagement process directly shaped the final wastewater standards. In response, the Authority refined the standards, sought further technical advice and addressed many of the key concerns raised during engagement. Targeted testing of approaches continued during the development of the final standards. In future, the Authority can develop other standards as set out in section 138 of the Act. This might include considering additional environmental parameters such as discharges to air (including odour), heavy metals and other contaminants to further strengthen the environmental performance of wastewater treatment plants across New Zealand.

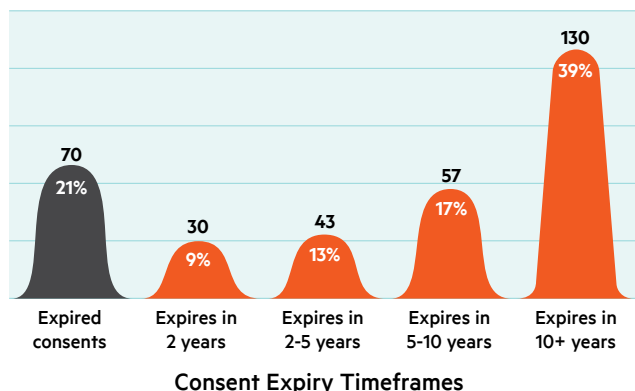
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1. Introduction

Upgrading and renewing New Zealand's aging public wastewater systems, which currently serve more than four million people, is one of the country's most urgent, costly and complex infrastructure challenges. Currently, wastewater treatment is inconsistent and characterised by aging infrastructure and unclear compliance and performance at a national level.

Figure 1 – Wastewater treatment plant consent expiry



In response, the Authority has developed an initial set of nationally consistent environmental performance standards for wastewater, aiming to streamline consenting, reduce regulatory burden and drive performance improvements across the country.

This report outlines how the standards have been developed and the findings of the formal consultation.

Overall, we have heard broad support for establishing national standards, particularly from local government and industry, and received many suggestions for improvement. Many submitters queried the adequacy of environmental protections and sought clarification on implementation. Where treatment limits were addressed, most submitters called for more stringent requirements. There were also requests for fewer exceptions and the development of additional standards to address discharges to air, heavy metals and emerging contaminants.

1.1. Purpose of this report

The purpose of this report is to provide:

- an overview of the engagement that supported development of the standards
- a summary of the submissions received, including areas where there were conflicting or diverse perspectives
- actions taken by the Authority to refine the standards.

1.2. Acknowledgements

The Authority recognises and thanks the many individuals and organisations who contributed to this important work through submissions, meetings and inquiries. The development of the wastewater standards has been strengthened by the high level of interest, discussions and input from across New Zealand. As well as working closely with our policy agency, the Department of Internal Affairs, we also recognise the ongoing and detailed support provided by central and local government agencies and peak bodies such as the Ministry for the Environment, Te Whatu Ora, territorial and regional councils, Water New Zealand, Local Government New Zealand and Te Uru Kahika – Regional and Unitary Councils Aotearoa. We also acknowledge the technical advice provided collaboratively by GHD, Beca, Stantec and MartinJenkins.

Finally, we thank all the iwi and hāpu who supported this work, not only through the case studies but by providing greater levels of understanding and helping us to develop suitable ways forward to uphold Tiriti obligations.

1.3. The Authority's mandate

The Water Services Act 2021 (section 138) empowers the Authority to set wastewater standards following public consultation. These standards may include requirements, limits, conditions or prohibitions related to activities associated with wastewater networks including:

- discharges to land, air or water
- biosolids and other by-products from wastewater treatment
- energy use associated with treatment and conveyance
- waste introduced by third parties into a wastewater network (e.g. trade waste).

The Local Government (Water Services) (Repeals and Amendments) Act 2025 transitioned the power to set these standards from the Authority to regulations made by Order in Council, on the advice of the responsible Minister. The changes also expanded on and clarified how these standards influence decision-making under the Resource Management Act 1991 (RMA).

1.4. Focus areas of the standards

The wastewater standards apply to public networks (usually council- or Crown-owned), as defined in the Water Services Act. The standards do not apply to privately owned systems, such as septic tanks or on-site treatment systems, which are instead regulated under existing codes and standards (e.g. AS/NZS 1547:2012).

The proposed wastewater standards address the most common areas of wastewater consenting, covering:

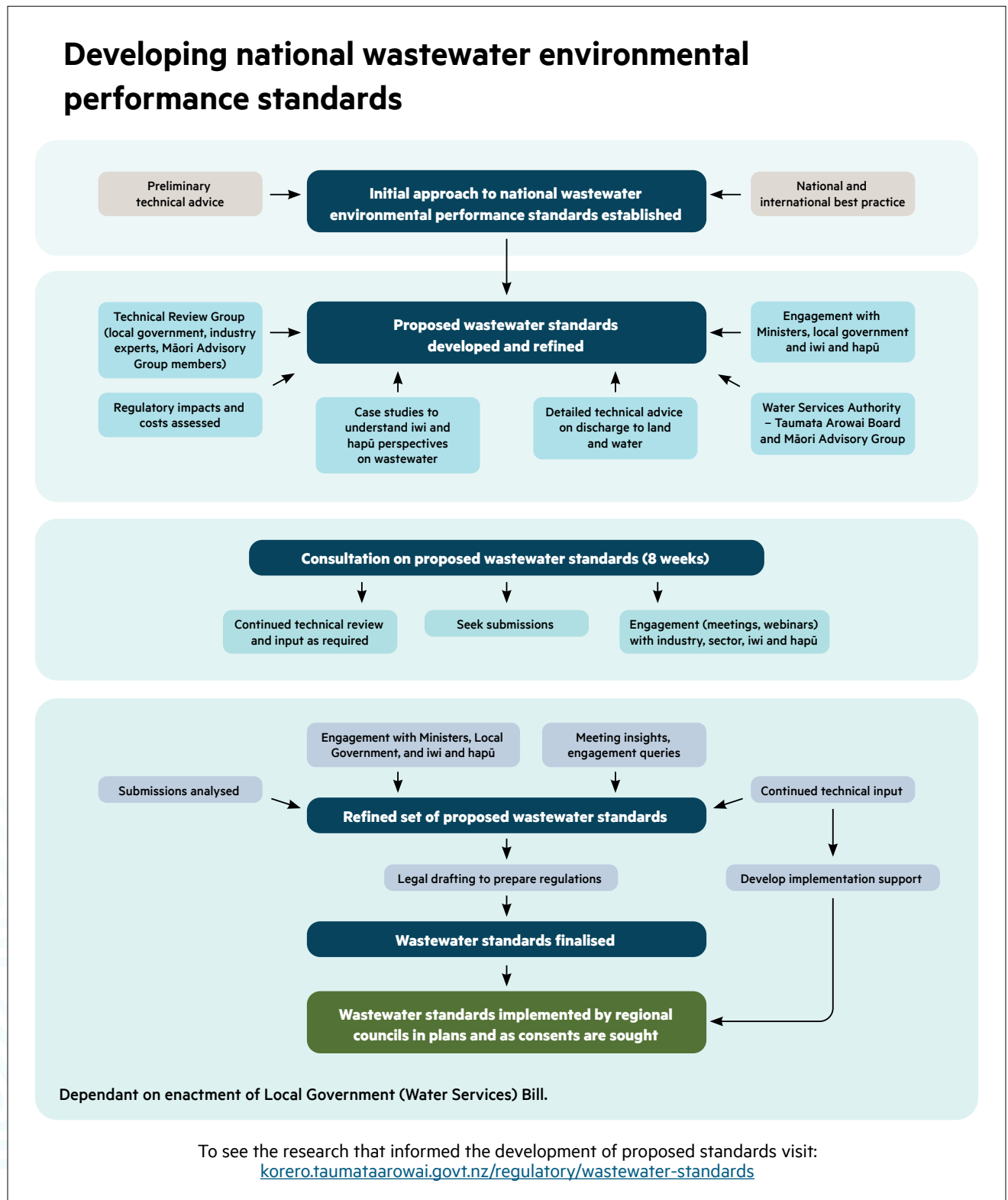
- discharges of treated wastewater to water
- discharges of treated wastewater to land
- beneficial reuse of biosolids to land
- management of overflows and bypasses.

Section 4 covers in more detail each of the standards as proposed and feedback from submitters. For more on what was proposed, refer to the consultation discussion document.

2. Development of the wastewater environmental performance standards

The Authority has developed New Zealand's first set of wastewater standards using a collaborative, evidence-informed policy process. This process took over 18 months and is summarised in the figure below.

Figure 2 – Wastewater standards development process



2.1 Technical advice

The Authority commissioned technical advice on how environmental performance standards could apply to the commonly consented activities for wastewater treatment. The aim was for a clear, implementable and enforceable approach that balanced treatment costs with risks and was informed by current practice in New Zealand. The higher the risk to receiving environments, the stronger the protections.

Key inputs and technical advice to the development process are available on our website [Information on proposed wastewater standards | Taumata Arowai](#) and outlined below.

- A review of previous work, such as the *New Zealand Wastewater Sector Report* (2021), commissioned by the Ministry for the Environment, and technical papers produced for the Department of Internal Affairs.
- Commissioning of technical reports to identify and explore potential areas and the framework for standard-setting, including the definitions of receiving environments, supported by in-depth scientific and engineering analysis.
- An interim and final Regulatory Impact Statement (RIS)
- Targeted technical advice on discharge standards for both water and land-based systems following consultation.
- An independent review by Kāhu Environmental focused on the cultural acceptability, technical robustness and intergenerational implications of the proposed treatment limits and receiving environment categories.

To support and test the development of these proposals, the Authority convened a technical review group comprising experts from across the wastewater system. The group met 11 times over 12 weeks, providing critical cross-sectoral advice on the feasibility and integrity of the proposed standards. Read [more information on the technical review group](#).

2.2 Case studies and insights from Māori

The Authority engaged with mana whenua and local councils to co-develop six case studies of wastewater treatment plants – in Gisborne, Taipā, Rotoiti-Rotomā, Cambridge, Pukekohe and Porirua. Developed in close partnership with local iwi and hapū, the case studies provide valuable insights into their experiences with the resource consenting process as well as the cultural values and aspirations that underpin their views on wastewater treatment.

The case studies reflect a wide range of experiences across varied geographic and demographic contexts, including urban and rural settings, communities with large and small population bases and environments with differing ecological sensitivities and treatment challenges. Read the [case study overview report](#).

Each study contributed uniquely to an understanding of the role of Māori in wastewater planning. Some key insights emerged from this work.

- At Rotoiti-Rotomā, technological innovation was central to the approach, with on-site pretreatment systems implemented to achieve higher levels of wastewater treatment.
- In Porirua, mana whenua expressed strong interest in advancing technological solutions to address capacity constraints within the treatment plant, particularly in response to rapid urban growth.
- Both the Taipā and Rotoiti-Rotomā studies demonstrate how targeted use of technology can help reduce the risk of adverse environmental effects.
- In Cambridge, the case study captured the engagement of Ngaati Hauaa, Ngaati Korokii Kahukura, and Waikato-Tainui, showcasing how early and sustained collaboration with mana whenua, combined with the adoption of advanced treatment technologies, supported the development of wastewater solutions that align with iwi aspirations and values.

Some common themes emerged from this engagement, including:

- There is a strong preference for ‘at-place’ decision-making that enables iwi and hapū to actively participate across the full lifecycle of wastewater systems — from design through to monitoring and reporting.
- Human waste is recognised as tapu, requiring whakanoa (cleansing) before re-entering the environment. This principle has informed preferences for discharge to land and other approaches that align with mātauranga Māori.
- There is a clear expectation for the highest possible treatment standards, whether discharge is to land or water, to ensure protection of the taiao (natural environment) and the communities connected to it.
- There is a preference for land-based discharges, though this is not always practical due to land suitability, economic constraints or the scale of infrastructure required.
- Challenges in resource consent processes often stem from inconsistent engagement by councils and under-resourcing, preventing iwi and hapū from participating effectively.

Find out how [iwi and hapū insights informed the proposed national standards](#).



3. Formal consultation process

Following the wide-ranging research, engagement and technical advice set out above, the Authority began formal public consultation on the draft wastewater standards. Public consultation ran from 25 February to 24 April 2025. This section covers the engagement undertaken during this period.

3.1 Webinars

In parallel with technical development, the Authority undertook extensive engagement to support and strengthen public consultation. Key to this effort were 17 webinars and Q&A sessions tailored to key audiences such as network operators, consenting authorities and iwi and hapū. These sessions attracted 320 live participants and the recordings have subsequently been viewed 479 times. Following an initial presentation by the Authority, the webinars provided opportunities for direct and detailed discussion and clarifications. They established an ongoing relationship between the Authority and key stakeholders, fostering continued meaningful dialogue and collaboration.

This proactive approach to engagement not only communicated the intent and scope of the proposed wastewater standards but also signalled the sector's interest and commitment to shaping the new regulatory framework. It helped to build trust and strengthen transparency in the consultation process and ensured that a broad range of voices – technical, cultural and operational – were heard and reflected in the evolving policy.

3.2 Targeted engagement (local government and industry)

Alongside wider engagement with the sector, the Authority undertook significant targeted engagement with key stakeholders throughout the development of the draft standards. We engaged at various levels, including at chief executive, senior leadership and project team levels. Engagements ranged from pre-consultation meetings and phone calls to specific key stakeholders, including 27 mayors and regional and territorial authority chief executives, to focused high-level discussions at face-to-face meetings with councils and presentations to specific sector groups, workshops and conferences.

Groups we engaged with included Local Government New Zealand, Water Utilities Association, Land Treatment Collective, Water Services Managers Group and Papa Pounamu (Māori Planner's Association). Targeted meetings were held with others, including Christchurch City Council, Taītuarā, Te Uru Kahika, Infrastructure Commission, Āpōpō, Watercare, Citycare, the Selwyn, Southland, Manawatū and Ōpōtiki district councils and several regional councils. In areas of Treaty settlements, we engaged with iwi and their councils.

There was significant ongoing engagement to test the proposals as they were finalised and the consent conditions as they were drafted. We will continue to seek opportunities for collaboration during the implementation phase.

This engagement has strengthened the policy development process and ensured that the final standards are practical and implementable.

3.3 Iwi and hapū engagement

The Authority has a legislative obligation to engage ‘early and meaningfully’ with Māori. This is set out in section 18 of the Water Services Authority – Taumata Arowai Act 2020.

Additionally, Treaty settlement obligations impose a duty on the Authority under the Water Services Act 2021 to have regard to Treaty settlement arrangements that exist and cover the Waikato-Waipā, Whangaehu and Whanganui River catchments.

The Authority sought to recognise Māori rights and interests through a three-tiered engagement approach with the following groups.

1. Group One: Iwi with Treaty settlement arrangements that impose statutory obligations on decision-makers in the Waikato, Waipā, Whangaehu and Whanganui River catchments.
2. Group Two: Iwi and hapū who have formal resource management arrangements relating to water services, including iwi participation arrangements under the RMA, Customary Marine Title holders or who hold co-governance or joint management arrangements over water bodies or coastal areas.
3. Group Three: All other iwi, hapū or Māori groups, both settled and non-settled, or individuals.

A range of mechanisms were used to support iwi and hapū engagement, including:

- 15 webinars for iwi and hapū to learn about the wastewater standards work and broader wastewater standards project
- 68 engagement meetings with the Authority
- extensive email and phone communications with iwi, hapū and other entities.

These engagements have informed advice to the Minister of Local Government on how the standards could apply where there are Treaty settlement or other relevant obligations – including specific provisions in the regulations to provide for such obligations.

3.4 Formal submissions

During the public consultation, the Authority received 151 submissions from across New Zealand, including 40 from local government and 39 from iwi and hapū.

Overall, there was broad support – particularly from local government and industry – for establishing national standards to improve consistency and clarity. However, many submitters raised concerns about the adequacy of environmental protections and sought clarification on implementation. Where treatment limits were addressed, most submitters called for more stringent requirements. There were also requests for fewer exceptions and the development of additional standards to address discharges to air, heavy metals and emerging contaminants.

Individual submissions will be available on our website (where submitters have agreed to publication).

Territorial authorities and council-controlled organisations (CCOs) were strong supporters of the standards. In particular, they backed efforts to standardise infrastructure design and the consenting process and highlighted ways the standards could apply to more treatment systems.

Regional councils, iwi and environmental advocates

acknowledged the challenges that wastewater treatment infrastructure faces but some preferred a more localised approach, tailoring consents to each community and catchment. There were concerns about long-term consents (e.g. 35 years) – a change made through the Local Government (Water Services) (Repeals and Amendments) Act 2025 – without regular updates. These concerns centred on whether all councils could transition in time and that cultural considerations had not informed the technical advice to categorise receiving environments. Still, there was clear support for consistent consent conditions and stronger compliance mechanisms.

Iwi submissions expressed strong concern about the potential impact of the proposed standards on mahinga kai and consistently called for wastewater to be discharged to land, where it can be naturally filtered by Papatūānuku, the Māori term for earth mother.

The next section is a condensed summary of submissions and the responses we took to inform the drafting process and final decisions.

4. Summary of submissions

4.1 Discharge to water

The proposed approach was to establish a discharge to water environmental performance standard that:

- categorises water bodies into seven receiving environments based on sensitivity and sets treatment limits for specified contaminants or 'parameters' that vary depending on category of receiving environments
- imposes monitoring and reporting arrangements for treatment requirements
- provides that, where a consent applicant can demonstrate they will meet treatment requirements imposed by the standard, the consent authority must issue a discharge consent with a 35-year timeframe
- sets separate treatment requirements that are tailored to small wastewater treatment plants (oxidation ponds) that service very small populations and have a minimal impact on the receiving environment.



Receiving environments for discharge to water

Submitters and shared groupings	What we heard through submissions	Comment
Territorial authorities and regional councils	<p>Some submitters requested clarity and additional guidance about how the seven categories of receiving environments will be defined and applied through resource consent applications.</p> <p>Some territorial authorities suggested refinements to how the open ocean category is determined. This included adding a category for inshore coastal areas, which are relatively common receiving environments in existing resource consents.</p>	<p>The Authority provided examples of suggested refinements to the relevant technical advisors. This feedback was also used to develop guidance to support implementation.</p> <p>The Authority commissioned further technical advice on the receiving environment categories in question to make sure they reflect the treatment required for those locations.</p>
Iwi and hapū	<p>Some submitters were concerned that using dilution alone to differentiate receiving environments would not sufficiently consider cumulative effects on receiving environments.</p> <p>There were concerns that cultural considerations had not informed the receiving environment categories.</p>	<p>The process and responsibilities for considering cumulative effects on receiving environments remain with regional councils and may also be addressed through changes to the resource management system.</p>
Territorial authorities	<p>Many territorial authorities supported increasing standardisation to deliver enhanced cost-efficiencies and certainty, including:</p> <ul style="list-style-type: none"> • ensuring that standards cover the largest range of receiving environments possible, e.g. very low dilution receiving environments • standardise additional risk assessment requirements such as the periphyton risk assessment for hard bottom streams • standardisation of monitoring and reporting requirements, with consideration of the practicality of requirements for continuous monitoring. 	<p>The Authority commissioned further technical advice to inform changes based on proposals of this nature, with an intent for standardisation to cover as wide a range of treatment arrangements as possible.</p>

Exceptions to the discharge to water standard

Submitters and shared groupings	What we heard through submissions	Comment
Territorial authorities and regional councils	<p>Many submitters suggested additional exceptions, often to correspond with categories of water bodies that are managed through existing planning instruments. Examples include:</p> <ul style="list-style-type: none"> • catchments with existing nutrient budgets • outstanding freshwater bodies • aquaculture areas • water bodies with water conservation orders. 	The Authority considered opportunities for additional exceptions. There was a high threshold for additional exceptions to maximise the benefits of the standards.
Iwi and hapū	Iwi and hapū asserted that exceptions were insufficient and proposed additional carveouts for pristine water bodies or sites of cultural significance. There were requests to involve iwi and hapū if an exception for pristine water bodies was added.	
Territorial authorities	A subset of territorial authorities requested that the list of exclusions be reduced to further streamline the consenting process and ensure the full benefits of the standards.	The Authority considered opportunities to cover as wide a range of treatment arrangements as possible and standardise as far as is possible the resource consenting process.

Small plant discharge to water standard

Submitters and shared groupings	What we heard through submissions	Comment
Territorial authorities	There was in-principle support to establish a small plant standard, given the unique characteristics of these treatment arrangements. There were requests for standardised technology solutions and package-type arrangements to enable councils to move away from relying on consultants to design small plants.	<p>The Authority commissioned additional technical advice about the details of the small plant standard, with a focus on treatment requirements for pathogens.</p> <p>The Local Government (Water Services) (Repeals and Amendments) Act 2025 enables the Authority to develop infrastructure design solutions to support implementation of wastewater standards. This feedback will inform priorities for that programme.</p>
Territorial authorities and industry bodies	These submitters suggested alternative ways of defining small wastewater treatment plants to ensure they are practical and easy to apply (e.g. by population or connections rather than influent load). There were also requests to develop tailored requirements for very small plants as well as small plant arrangements that discharge to land.	<p>The Authority worked with interested councils to test qualifying criteria for the small plant standard.</p> <p>Existing arrangements in the discharge to land standard will already allow for small plant arrangements – no further work was required.</p>
Iwi and hapū, consenting authorities	Submitters expressed concern about the cumulative effects on water bodies, and that reduced treatment requirements may incentivise a proliferation of small treatment plants, particularly in situations where larger plants and more advanced treatment are appropriate.	The small plant standard will be available only to existing treatment plants that meet the definition of small plants. This will limit the number of plants operating under the small plant standard. It will also ensure the number reduces over time as plants are replaced or the population they serve exceeds 1,000.

Treatment limits

Submitters and shared groupings	What we heard through submissions	Comment
Industry bodies, consenting authorities, iwi and hapū	<p>There were requests for more stringent treatment limits and additional parameters to be included in the open ocean receiving environment. There was a view that the treatment limits for the open ocean receiving environment category were not stringent enough and would not adequately protect the environment.</p> <p>Some submitters strongly objected to less stringent <i>E. coli</i> limits for smaller communities, especially where discharging to low-dilution rivers and streams. Similarly, there were requests to re-examine <i>E. coli</i> and enterococci limits for all receiving environments and understand how they relate to recreational bathing guidelines.</p>	The Authority commissioned additional technical advice on this topic to test our approach and ensure that the standards will pragmatically balance cost-effectiveness, operational efficiency and environmental outcomes.
Territorial authorities, consenting authorities, iwi and hapū	<p>There was widespread support for using quantitative microbial risk assessments to determine pathogen limits in shellfish gathering sites. Submitters requested clarification on when these assessments are triggered and explicit direction about how communities, including iwi and hapū, will be involved. There were also requests to expand risk assessment requirements to include historic and future shellfish beds and to review risk assessments at regular intervals.</p>	The Authority has considered how to structure and expand quantitative microbial risk assessment requirements.
Territorial authorities, consenting authorities, iwi and hapū	<p>Some submitters supported using site-specific assessments to determine nitrogen and phosphorous treatment requirements for hard-bottomed, algae-prone rivers and streams.</p> <p>There were requests to further standardise the proposed approach by using a risk matrix with fixed limits depending on periphyton growth.</p>	The Authority has refined the proposed standards to support standardisation as far as possible.
Industry bodies, territorial authorities, consenting authorities	<p>Various submitters recommended the discharge to water standard is expanded to include additional metrics alongside the existing concentration limits. Suggestions included establishing daily maximum limits and introducing seasonally variable limits.</p>	The Authority considered how to use additional metrics to support the existing concentration limits.

4.2 Discharge to land

The proposed approach was to establish a discharge to land environmental performance standard that:

- sets out a risk-based framework to determine what types of land treated wastewater may (or may not) be discharged to
- sets out treatment requirements to reflect each risk category for wastewater that is discharged to land
- imposes monitoring and reporting arrangements
- provides that, where a consent applicant is able to demonstrate that they will meet treatment requirements imposed by the standard, the consent authority must issue a discharge consent with a 35-year timeframe.



Exclusions to the discharge to land standard

Submitters and shared groupings	What we heard through submissions	Comment
Iwi and hapū	Baseline assessments will be used to determine attributes of land to avoid compromising cultural heritage, traditional land-use practices and respect the values of local communities. These submitters sought clarification on what exclusions apply and suggested the matters covered in a baseline assessment be expanded to identify areas of cultural significance. Where sites of cultural significance are found, treated wastewater should not be discharged.	<p>The Authority confirmed which sites are captured by the exclusions to ensure language used is consistent with community expectations and include land-based mahinga kai, marae (as a descriptor of housing) and sites of significance such as wāhi tapu and urupā.</p> <p>The Authority will continue to work with stakeholders to develop guidance on considerations when determining site selection and applying a tikanga-led exclusions framework.</p>
Consenting authorities	Submitters from this group support the exclusion of category five land from the standards. In situations where potential sites are deemed unsuitable for discharging treated wastewater, this should be managed by consenting authorities through the default resource consenting process.	The Authority will work with consenting authorities to ensure consistency across exclusions and their responsibilities.

Baseline and site-specific risk assessment

Submitters and shared groupings	What we heard through submissions	Comment
Territorial and consenting authorities	Suitable sites will progress to more detailed risk screening and site-specific assessments. Submitters offered technical advice and suggestions around specifics of discharging to land. This included feedback on how to align requirements with existing limits (e.g. nitrogen).	The Authority shared the suggested refinements with technical advisors. Feedback will also inform implementation support and guidance for the pre-consenting process for discharges to land (to determine site suitability).
Territorial authorities, iwi and hapū	Territorial authorities and iwi submitters alike shared a strong desire for more guidance and tools to support pre-consenting and risk assessment stages.	
Industry bodies	Submitters from this group provided examples of existing guidance to support the discharge to land standard and its implementation.	Implementation guidance will be aligned with existing advice where relevant, e.g. approaches to managing emerging contaminants in land.

Treatment and application limits

Submitters and shared groupings	What we heard through submissions	Comment
Industry bodies	<p>Submitters suggested additional clarity to ensure parameters and limits in the standard reflect local attributes and are aligned with other settings and parameters (e.g. caution against taking a blanket approach for hydraulic loading for all soil types in New Zealand – a maximum could be applied).</p> <p>Broadly, submitters thought the nutrient loads, limits and hydraulic loading were too permissive.</p>	Examples provided by submitters were reviewed by technical advisors. This will ensure the standards appropriately balance cost-effectiveness, operational efficiency and environmental outcomes.
Iwi and hapū, territorial authorities	Network operators echo the submissions of iwi and hapū in providing ability for local factors to be monitored effectively and changing conditions to be accommodated on a case-by-case basis. Additionally, the proposed standards also do not set daily or annual limits and do not account for other influencing factors such as heavy rainfall events.	<p>The finalised standards confirm monitoring requirements, what actions are taken where monitoring returns poor results and who is responsible for enforcement.</p> <p>Consenting authorities retain responsibility for enforcing consents (and the wastewater standards).</p>
Territorial authorities	Councils operating rapid infiltration schemes proposed the expansion of standardisation to cover them, and proposed ways to do this based on their existing operations and available information about environmental impact.	The Authority commissioned further technical advice on appropriate treatment limits for rapid infiltration schemes.

Management and operations plans

Submitters and shared groupings	What we heard through submissions	Comment
Iwi and hapū	Submissions raised the importance of incorporating existing arrangements in the management and operations planning process required by a discharge to land standard (e.g. regional, catchment and iwi/hapū management plans).	The Authority will consider examples and existing practice when developing guidance to support the discharge to land standard.
Territorial authorities, consenting authorities	Council submissions noted that similar plans already exist for discharges to land and could be used as a starting point for what is required by the standard.	The Authority will consider existing national guidance and similar existing plans when finalising the list of requirements.

4.3 Beneficial reuse of biosolids

The proposed approach was to establish an environmental performance standard for beneficial reuse of biosolids, including:

- setting out a grading system for processing biosolids, with corresponding activity status under the RMA for how and where biosolids can be reused
- imposing additional requirements where biosolids have a lower grade
- imposing monitoring and reporting requirements to reflect the grade of biosolids.



Submitters and shared groupings	What we heard through submissions	Comment
Consenting authorities, territorial authorities, iwi and hapū, industry bodies	<p>Submitters generally supported the proposed grades for biosolids.</p> <p>Some submitters suggested alternate arrangements for activity status across categories (e.g. provision of odourless biosolids should receive permitted activity). Iwi and hapū support removing permitted activity status for all biosolids applications or at least including limits on contaminants, application rates and monitoring requirements.</p> <p>Other suggestions to improve the standards include clearly defined grades, site accumulation limits and exclusion zones.</p>	<p>The Authority will take on advice to work closely with Water NZ and industry stakeholders to further clarify criteria and define grades of biosolids in guidance.</p> <p>The Authority will work with the Ministry for the Environment to ensure the appropriate activity class is consistent with future resource management system changes.</p> <p>The additional work will also include reviewing and testing of controls that should apply to sites and the incorporation of tikanga in risk assessment.</p>
	<p>Concern was widely raised about the cumulative effects and catchment-scale impacts of nutrient loading in discharge to land standard.</p> <p>In reference to that concern, submitters across the system raised the need for clarification regarding contaminant thresholds crossing regional boundaries and how they might be monitored.</p>	<p>The Authority will work with regional councils to determine the best method for tracking biosolid use and application.</p> <p>Consideration also needs to account for cumulative effects and a precautionary approach to avoid creating unintended impacts for consenting authorities.</p> <p>Monitoring requirements and loading limits may need to be reviewed.</p>
	<p>There was support for removing permitted activity consenting pathways for all biosolid applications to ensure cultural and community values are respected and upheld and contaminants of emerging concern are captured.</p>	<p>The standards are aligned with Water NZ guidance on re-use of biosolids including planning controls.</p>
	<p>Submitters expressed the need to ensure the standards provide discretion for exclusion zones for the level of contaminants and testing, monitoring and reporting on these as well as controls on odour. They suggested that maintaining controlled or restricted discretionary consent conditions was a way to maintain this.</p>	<p>The Authority considered the appropriateness and viability of planning controls for consenting authorities.</p>
	<p>Submitters supported a future work programme to address biosolid contaminants of emerging concern.</p>	<p>The Authority will need to work with other agencies (e.g. Environmental Protection Authority) to develop a future work programme for additional standards and triggers for amendments to satisfy an approach to emerging contaminants, heavy metals and long-term public health impacts and risk assessments.</p>

4.4 Management of overflows and bypasses

The proposed approach was to establish risk-based planning, monitoring and reporting arrangements for wastewater network overflows and bypasses from wastewater treatment plants, including:

- requiring network operators to use wastewater risk management plans to identify where risks of overflows are, and how they should be managed, controlled, monitored and eliminated
- imposing monitoring and reporting requirements for overflows from wastewater networks
- making all overflows a controlled activity under the RMA, consistent with recent changes through the Local Government (Water Services) (Repeals and Amendments) Act 2025.



Risk-based approach

Submitters and shared groupings	What we heard through submissions	Comment
Territorial authorities, consenting authorities, iwi and hapū	<p>There was widespread support for managing overflows and bypasses through a risk-based approach, as it enables territorial authorities to prioritise managing overflows within their resource constraints.</p> <p>While there was support for a risk-based framework, consenting authorities emphasised network operators should not be able to defer or avoid minimum requirements. These include developing wastewater risk management plans and obtaining resource consents.</p>	The standard sets mandatory requirements for all territorial authorities.
Iwi and hapū, territorial authorities	A small number of submitters suggested the standard should limit the frequency of overflows or introduce limits for acceptable levels of inflow and infiltration in a network.	<p>While the Authority may introduce these requirements in future, the first step in managing overflows is to create a clear picture of where, when and how often overflows occur.</p> <p>The Authority will develop key messages about how overflows and bypasses will be managed over time, using other tools such as targets.</p>

Controlled activity status

Submitters and shared groupings	What we heard through submissions	Comment
Consenting authorities, territorial authorities	<p>A large number of submitters supported making overflows a controlled activity. Overflows are a reality of wastewater management in New Zealand and internationally, particularly at times of rainfall or asset failure.</p> <p>Submitters requested clarity on how the proposed approach aligns with proposed changes to the resource management framework to remove controlled activity status.</p>	The Authority will continue to work with the Ministry for the Environment to refine the proposals and confirm which activity status should apply as transitional considerations become clearer.
Iwi and hapū, consenting authorities	Submitters said it is more appropriate to manage overflows and bypasses as a restricted discretionary activity. This would allow regional councils to decline consents where overflows and bypasses pose an unreasonable risk to the health of the receiving environment.	
Iwi and hapū, consenting authorities	Submitters believed the standard should require territory authorities to hold a single, global consent for overflows and bypasses in a wastewater network.	The Authority considered whether the standard should require global consents for overflows and bypasses. Consenting authorities retain the ability to require global consents if they wish.
Iwi and hapū, industry bodies	A smaller group of submitters were concerned that managing overflows and bypasses as a controlled activity fails to adequately manage the effects. Overflows and bypasses should not be an accepted part of wastewater network management, particularly where they are created by constrained capacity.	The Authority is developing guidance on how overflows and bypasses will be reduced over time. The priority is understanding where, when and how often overflows are happening, ahead of using stricter tools such as targets.

Risk management plans

Submitters and shared groupings	What we heard through submissions	Comment
Territorial authorities	<p>Submitters supported tailoring risk management planning to the size and scale of network operations and overflows.</p> <p>There was some concern from smaller councils about the affordability of additional investigations, consenting, monitoring and reporting that would be required.</p>	The Authority considered how phasing in networks of different scale and complexity will impact the implementation of wastewater standards, taking account of how to maintain consistency with the broader risk-based approach.
Consenting authorities and industry stakeholders	Risk management plans should inform the consent application and the consenting conditions should inform how the risk management planning is implemented.	The Authority will develop guidance on implementing risk management planning, including clear indications of the general regulatory and risk-based approach over time.
Territorial authorities, iwi and hapū	Submitters agreed the risk management process should be developed in partnership and align with other planning processes and risk assessments.	<p>Guidance developed for risk management planning will include best practice early engagement advice and expectations of alignment and integration with long-term infrastructure, stormwater flood risk and regional plans.</p> <p>The Authority will also seek advice on developing a risk matrix (including cultural risk assessment) and response protocols.</p>

4.5. Transition and implementation

Around 20% of public wastewater treatment plants in New Zealand are currently operating on expired consents under section 124 of the RMA. This provision allows network operators to continue discharging under the conditions of an expired consent if a renewal application has been lodged within statutory timeframes. In practice, this has resulted in plants operating on expired consents for an average of five years. In some cases, the period is significantly longer. One plant has been operating under an expired consent for 24 years.

This situation creates uncertainty for councils, communities and the environment, as the lack of defined performance expectations delays necessary upgrades and undermines consistency across regions.

Managing expired consents and the role of section 124 of the RMA

The proposed wastewater standards sought to establish a clear, nationally consistent approach to managing expired consents. Specifically, the standards will introduce a maximum timeframe of two years for treatment plants to operate under section 124, to take effect three years following the standards coming into force. The rationale behind this five-year lead in time is that with national standards in place, treatment requirements will be clear and councils will be better equipped to make timely decisions and plan investments.

Feedback from submissions

Submissions on the proposed two-year cap under section 124 reflected a wide range of perspectives.

- Many submitters supported a time limit in principle, recognising the need to avoid indefinite operation on expired consents.

- Some submitters suggested a shorter transition period (less than five years), particularly if mechanisms for staged or risk-based compliance could be built into the consenting framework.
- Others raised concerns that a fixed two-year limit, even with a delayed start, could create bottlenecks in consenting, increase compliance risk and challenge the ability of councils to design, fund and implement upgrades within a short timeframe.
- Several recommended a staggered or risk-based approach, allowing more flexibility for lower-risk plants or phased implementation over time.

On balance, the Authority considers that retaining the proposed two-year limit, to take effect three years following the enactment of the standards (i.e. a five-year transition period), strikes an appropriate balance. It incentivises timely action, ensures national consistency and provides operational flexibility to support successful implementation.

Local Water Done Well and broader reform context

The development of the wastewater standards is a key part of Local Water Done Well – the Government’s approach to addressing long-standing challenges in water service delivery. During the consultation process, a package of RMA reform proposals was announced, signalling some major changes in planning and resource management.

Submissions on broader policy issues (out of scope)

A substantial number of submissions raised concerns or suggestions about broader water reforms and legislative changes, particularly those in the Local Government (Water Services) Bill, which was in a select committee process at the time of engagement and indicated amendments to resource management and planning.

The following topics were among those raised by submitters but fall outside the scope of the standards-setting process

- **Use of “absolute” standards:** Many submitters opposed a “one-size-fits-all” approach, instead calling for minimum standards that allow communities to exceed baseline requirements based on local values or plant performance. This setting is a change through the Local Government (Water Services) Act.

- **35-year consent duration:** Concerns were raised about long-term discharge consents with limited review opportunities, and the implications for responsiveness to future changes in environmental conditions or technology.
- **Overlap with pending legislative reforms:** Some submitters questioned whether it was appropriate to progress standards while other foundational changes (e.g. RMA reform and Three Waters governance) are still under development. Particular concerns were raised about the proposal for the standards to set activity statuses, which may be affected by future legislative changes.
- **Questions about RMA sections 105 and 107:** Submitters sought clarity on whether these provisions, which guide the assessment of discharge effects and standards for water quality, would continue to apply alongside the final standards.

As these topics relate to legislative or regulatory changes outside the Authority’s mandate, no changes have been made to the wastewater standards in response.

Areas for future work

Many submitters identified topics they believed should be addressed in future regulatory development or guidance, including:

- discharges to air from treatment facilities
- emerging and persistent contaminants, such as PFAS, and heavy metals like iron and aluminium
- infrastructure design standards and resilience planning
- guidance on implementation pathways, including staged compliance, affordability considerations and Māori values integration.

These submissions offered valuable insight into sector priorities and community expectations. They helped inform the Authority’s future work programme, including possible extensions of the standards, implementation support materials and technical guidance.

[Find out more about Local Water Done Well on the Department of Internal Affairs’ website](#)

5. Next steps

The Authority is planning for implementation, with a strong emphasis on how best to support councils, network operators, iwi, hapū and other stakeholders in preparing to meet the new regulatory requirements.

Clear guidance, collaborative engagement and practical support will be central to the approach.





Water Services Authority
Taumata Arowai

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