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Measuring Up: Environmental Reporting – A Discussion Document

SUBMISSION OF WATERCARE SERVICES LIMITED

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1.0 CONTACT DETAILS

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2.0 INTRODUCTION

Watercare Services Limited ("Watercare") is New Zealand's largest water and wastewater company. Established in 1992, Watercare is a council organisation under the Local Government (Auckland Council) Act 2009. As a result of the recent Auckland reorganisation, Watercare is now wholly owned by the Auckland Council and will become a council-controlled organisation from 1 July 2012.

As a result of the creation of the Auckland Council on 1 November 2010, Watercare now provides integrated water and wastewater services to around 1.3 million people in the Auckland region. In addition to its existing bulk water and wastewater network, Watercare assumed the water and wastewater assets and responsibilities of all the previous Auckland territorial authorities (except Papakura District Council which has a franchise agreement with United Water).

Water supply and wastewater services are essential for the health and wellbeing of the community. As such, Watercare works to ensure that the people of Auckland, both those living here today and the future generations enjoy dependable water supply and wastewater services. In particular, Watercare has a legal obligation under the Local Government (Auckland Council) Act 2009 to manage the business efficiently. This requires keeping the overall costs to customers collectively at minimum levels while still maintaining the long term integrity of assets and meeting compliance requirements.

Watercare currently holds hundreds of resource consents, many of which are discharge consents for wastewater treatment plants and overflows. Conditions attached to these consents require that Watercare monitor the quality of the discharge and the effects on the receiving

environment and ecology. The amount and type of monitoring depends upon the conditions of the particular discharge consent. Watercare is also involved in monitoring freshwater water ecology around our water supply dams and has an active "trap and haul" programme for native fish.

In addition, Watercare operates Watercare Laboratory Services (WLS), a commercial analytical laboratory. WLS carries out environmental analytical work for three regional councils as well as a significant number of city and district councils and commercial organisations. WLS' air quality monitoring operation is the largest provider of ambient air quality monitoring in New Zealand and is estimated to carry out 70-80% of all monitoring.

3.0 GENERAL SUBMISSION

This section provides Watercare's feedback on selected questions set out in the Discussion Document.

3.1 Question 2 - Are there any issues that need to be considered?

Watercare agrees with developing an Environmental Reporting Bill to amend the Environment Act 1986 to give the Parliamentary Commissioner for the Environment the role of requiring five yearly state of the environment reports. Watercare agrees that, if well drafted and implemented, the proposed Bill will have the potential to achieve the following:

- a. clarifying who is responsible for regular state of the environment reporting
- b. providing state of the environment reporting that would be independent of government
- c. providing high quality environmental statistics to underpin state of the environment reporting and environmental policy making.

Watercare also generally agrees with the assessment criteria proposed to be used to assess the best option. These criteria will help to ensure a high quality, independent set of information at the national level, while at the same time achieving efficiencies in its collection, collating and use. The criteria are listed in the discussion document as:

- a. providing certainty for the state of the environment reporting
- b. dispelling any perception of lack of independence
- c. being a natural fit with legislated responsibilities
- d. achieving high quality, consistent environmental monitoring
- e. being cost efficient.

3.2 Question 12 – Is five year reporting an appropriate timeframe?

For comprehensive reporting, five years is appropriate. However, data sets could be made available yearly. This would enable these data sets to be more readily available and useful for entities that want to use this information for research, consent applications, and other matters.

3.3 Question 14 - Outline any problems you perceive with the proposed RMA amendment?

Watercare currently undertakes water quality testing and monitoring related to its resource consent compliance responsibilities. Watercare wishes to ensure that the proposed national environmental reporting legislation will result in the following outcomes:

- a. There will be greater environmental reporting efficiencies and an avoidance of unnecessary increases or duplications in monitoring and reporting requirements. The key issue is to ensure that the information is usable.
- b. That the substantial amount of information that Watercare already compiles as part of its consent monitoring responsibilities can be better utilised as part of the proposed national reporting legislation.
- c. The information that is compiled as a result of the proposed national reporting requirements can be effectively used to provide baseline information that is often required to be supplied as a part of a resource consent application or a Notice of Requirement.

3.4 Question 15 - Have we accurately reflected the high level costs and benefits arising from the proposals for An Environmental Reporting Bill?

Watercare recognises that there are implementation costs but also longer term benefits provided that the data sets are readily usable for other purposes.

4.0 ADDITIONAL COMMENTS

As mentioned above, Watercare Laboratory Services (WLS) is a commercial analytical laboratory owned by Watercare which undertakes environmental analytical work for Watercare as well as a significant number of regional, city and district councils and commercial organisations. WLS has the following comments to make on the discussion document:

- a. With the establishment of a reporting bill, it is likely that there will be a need to develop standard analytical testing programmes and methods to support the objectives of the bill. As a major player in providing these services WLS can offer considerable experience in assisting with development of such standards.
- b. While analytical laboratories are not 'reporting partners', WLS would like to be included in the development of variables and methodologies. This will ensure that there is early communication so that laboratories, including WLS, are ready to meet standards when they are imposed.
- c. WLS has invested considerably in equipment, method development and staff expertise to bring methods from the research arena into routine production for use in environmental testing. In some cases, WLS is the only commercial laboratory offering certain types of testing. It would be helpful if WLS could be involved in the decision making about future standards so that the availability of such testing is not overlooked. Examples of this are virus enumeration by tissue culture, helminth identification and enumeration and enumeration of a range of pathogens in shellfish and marine sediments.
- d. WLS is continuing to invest in equipment and method development for emerging testing, at the behest of regional councils. WLS would be concerned if standards were established that excluded the potential for such testing to be introduced.

Examples of this are endocrine disruptors, microbial source tracking and pharmaceutically reactive compounds.

- e. It is desirable to ensure that new technologies which offer improved detection limits and efficiencies are included in the standards or alternatively that old technologies are not allowed that are not capable of meeting modern expectations.

5.0 Conclusion

Thank you for the opportunity to provide feedback on the discussion document. Watercare, together with Watercare Laboratory Services, wishes to be kept informed of other stages in the process and may wish to be involved in these later stages.

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