SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT ON THE
“ACTION FOR HEALTHY WATERWAYS” CONSULTATION
31 October 2019

Allied Concrete Limited and AML Limited

Personal details removed

Allied Concrete Limited is part of the HW Richardson Group Limited, which is a family owned business proudly based in Southland. The original foundations of the company were based within the building industry but over the years have grown to include ready mixed concrete, transport, fuel distribution, road construction and maintenance as well as sand, aggregates and lime.

AML Limited is a joint venture between Allied Concrete Limited and Holcim New Zealand Limited, to facilitate expansion in the North Island. This business called AML Limited, trades as Allied Concrete (AC) and is managed within the Allied Concrete structure.

The HW Richardson group employs over 2,000 staff.

The primary focus of this submission relates to the provisions for stormwater management.

1.1. Key Messages

1. AC supports the government’s vision of halting any decline in the quality of New Zealand’s freshwater bodies, and steadily improving freshwater quality over time.

2. Sustainability is important to AC and for the communities where we work and live.

3. AC sites have very limited discharges and do not contribute nitrogen, phosphorus, or E-Coil to environment. A limited amount of sediment is discharged. Many of AC sites recycle their contaminated stormwater back into concrete manufacture, with discharge to the receiving environment only occurring in events greater than a 10 year event.

4. There is significant variation in the approaches used by Regional Councils and City/District Councils who are stormwater system operators to document and report on how they manage risks to the environment, people and property.
This means there is significant variation between regions as to the standard of stormwater management required from AC sites across the country making it difficult to efficiently consent the discharges from our sites. Some Councils to not appear to account for the very infrequent discharges that may occur from some of the AC sites.

5. Balancing the many interests affected by the proposals will be complex. We are concerned that the proposals, as drafted, might result in disproportionate costs and compliance burdens on industry to manage the risk of environmental harms to which they have not contributed and will not contribute.

**Allied Concrete Submission:**

1. AC supports the development of nationally consistent stormwater regulations and methods.

2. AC supports the requirement for stormwater network operators to prepare a risk management plan (RMP).

3. AC supports the introduction of nationally consistent monitoring and reporting with the proviso, that the resulting water quality standards are tailored to the water body type and frequency of discharge so that a single standard is not set for all discharges, and water bodies receiving standards.

4. AC seeks that if end-of-pipe limits are established, that these take into account green infrastructure involved with the discharge system and the sensitivity of receiving catchment and most importantly, the frequency that the discharge may occur.

5. AC seeks that in the establishment of the new Water Services Act, provision is made to require MFE to work with industry as the stormwater regulations are further developed so that the lowest common denominator (worst case) is not applied to all. The RMA direction of looking at the receiving environment and assessing the effects and designing a system to avoid, remedy or mitigate must be maintained.

6. AC supports the implementation of water sensitive design and green infrastructure, with the provision that direct discharges during high intensity events (i.e. over 1:10 year return period) are not excluded.

7. AC supports the development of guidance at a national scale to provide consistency in green infrastructure good practice and therefore reduce the need for individual councils to 'reinvent the wheel'.

Signed: ___________________________ Date: 30th October 2019