



PALMERSTON NORTH CITY COUNCIL

AGENDA

SUSTAINABILITY COMMITTEE

9:00 AM, WEDNESDAY 16 APRIL 2025

COUNCIL CHAMBER, FIRST FLOOR
CIVIC ADMINISTRATION BUILDING
32 THE SQUARE, PALMERSTON NORTH

MEMBERS

Brent Barrett (Chair)
Kaydee Zabelin (Deputy Chair)
Grant Smith (The Mayor)

Roly Fitzgerald	Lorna Johnson
Patrick Handcock	Debi Marshall-Lobb
(ONZM)	
Leonie Hapeta	Karen Naylor

AGENDA ITEMS, IF NOT ATTACHED, CAN BE VIEWED AT

pncc.govt.nz | Civic Administration Building, 32 The Square
City Library | Ashhurst Community Library | Linton Library

Waid Crockett

Chief Executive | PALMERSTON NORTH CITY COUNCIL

Te Marae o Hine | 32 The Square
Private Bag 11034 | Palmerston North 4442 | New Zealand
pncc.govt.nz

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CITY

SUSTAINABILITY COMMITTEE MEETING

16 April 2025

ORDER OF BUSINESS

1. Karakia Timatanga

2. Apologies

3. Notification of Additional Items

Pursuant to Sections 46A(7) and 46A(7A) of the Local Government Official Information and Meetings Act 1987, to receive the Chairperson's explanation that specified item(s), which do not appear on the Agenda of this meeting and/or the meeting to be held with the public excluded, will be discussed.

Any additions in accordance with Section 46A(7) must be approved by resolution with an explanation as to why they cannot be delayed until a future meeting.

Any additions in accordance with Section 46A(7A) may be received or referred to a subsequent meeting for further discussion. No resolution, decision or recommendation can be made in respect of a minor item.

4. Declarations of Interest (if any)

Members are reminded of their duty to give a general notice of any interest of items to be considered on this agenda and the need to declare these interests.

5. Public Comment

To receive comments from members of the public on matters specified on this Agenda or, if time permits, on other Committee matters.

6. Local Water Done Well - Hearing of Submissions Page 7

7. Local Water Done Well - Summary of Submissions Page 11

Memorandum, presented by Olivia Wix, Manager Communications, Mike Monaghan, Manager 3 Waters and Julie Keane, Transition Manager.

8. Confirmation of Minutes Page 17

That the minutes of the Sustainability Committee meeting of 19 February 2025 Part I Public be confirmed as a true and correct record.

9. Annual Sector Lead Report: Environment Network Manawātū Page 21

Memorandum, presented by Amy Viles, Community Development Advisor.

10. Wastewater Treatment Plant - Nature Calls; Quarterly Update and Submission to Taumata Arowai on Draft Standards Page 49

Memorandum, presented by Mike Monaghan - Manager 3 Waters.

11. Committee Work Schedule Page 69

12. Karakia Whakamutunga

13. Exclusion of Public

To be moved:

That the public be excluded from the following parts of the proceedings of this meeting listed in the table below.

The general subject of each matter to be considered while the public is excluded, the reason for passing this resolution in relation to each matter, and

the specific grounds under Section 48(1) of the Local Government Official Information and Meetings Act 1987 for the passing of this resolution are as follows:

General subject of each matter to be considered		Reason for passing this resolution in relation to each matter	Ground(s) under Section 48(1) for passing this resolution

This resolution is made in reliance on Section 48(1)(a) of the Local Government Official Information and Meetings Act 1987 and the particular interest or interests protected by Section 6 or Section 7 of that Act which would be prejudiced by the holding of the whole or the relevant part of the proceedings of the meeting in public as stated in the above table.

Also that the persons listed below be permitted to remain after the public has been excluded for the reasons stated.

[Add Third Parties], because of their knowledge and ability to assist the meeting in speaking to their report/s [or other matters as specified] and answering questions, noting that such person/s will be present at the meeting only for the items that relate to their respective report/s [or matters as specified].

SUBMISSION FROM CONSULTATION

TO: Sustainability Committee

MEETING DATE: 16 April 2025

TITLE: Local Water Done Well - Hearing of Submissions

RECOMMENDATION(S) TO SUSTAINABILITY COMMITTEE



1. That the Committee receive the submissions and hear submissions from presenters who indicated their wish to be heard in support of their submission.
2. That the Committee note the Procedure for Hearing of Submissions, as described in the procedure sheet.

SUBMITTERS WISHING TO BE HEARD IN SUPPORT OF THEIR SUBMISSION

(link to submissions: [Local-Water-Done-Well-consultation](#))

Submission No.	Submitter
159	Susan Hodge
172	Steve Allan
186	Chris Teo-Sherrell
188	William Bent
194	Tom Santing
195	Janet Darragh
196	Christine Staples

ATTACHMENTS

1. Submissions - Local Water Done Well (attached separately) 
2. Tānenuiārangi Manawatū Charitable Trust submission (attached separately) 
3. Procedure Sheet [↓](#) 

Procedure Sheet Hearing of Submissions

Presenting your submission

You have indicated a wish to present your submission before a Committee of Councillors; you can do this either in-person or online. You may speak to your submission yourself or, if you wish, arrange for some other person or persons to speak on your behalf.

We recommend that you speak to the main points of your submission and then answer any questions. It is not necessary to read your submission as Committee members have a copy and will have already read it.

Questions are for clarifying matters raised in submissions. Questions may only be asked by Committee members, unless the Chairperson gives permission.

Time Allocation

10 minutes (including question time) will be allocated for the hearing of each submission. If more than one person speaks to a submission, the time that is allocated to that submission will be shared between the speakers.

Who will be there?

The Sustainability Committee will hear the submissions. The Committee comprises of Elected Members as identified on the frontispiece of the Agenda.

There will also be other people there who are presenting their submission. The Hearing is open to the media and the public.

Agenda

An Agenda for the meeting at which you will be speaking will be publicly available at least two working days prior to the meeting. It will be published on the Palmerston North City Council website ([Agendas and minutes](#)) and available to view at the Customer Service Centre. The Agenda lists the submissions in the order they will be considered by the Committee, although there may be some variation to this.

Venue

The meeting will be held in the Council Chamber, First Floor, Civic Administration Building, Te Marae o Hine, 32 The Square, Palmerston North.

The Council Chamber will be set out with tables arranged appropriately. You will be invited to sit at the table with the Councillors when called.

Tikanga Maori	You may speak to your submission in Maori if you wish. If you intend to do so, please contact us no later than four days before the date of the meeting (refer to the 'Further Information' section below). This is to enable arrangements to be made for a certified interpreter to attend the meeting. You may bring your own interpreter if you wish.
Visual Aids	A whiteboard, and computer with PowerPoint will be available for your use. We prefer you notify us before the day if you will require these.
Final Consideration of Submissions	Final analysis of submissions is expected to be at the full Council meeting on 7 May 2025. The media and public can attend these meetings, but it will not be possible for you to speak further to your submission or participate in the Committee deliberations.
Changes to this Procedure	The Committee may, in its sole discretion, vary the procedure set out above if circumstances indicate that some other procedure would be more appropriate.
Further Information	If you have any questions about the procedure outlined above please contact Natalya Kushnirenko, Governance Administrator, phone 06 356 8199 extension 7106 or email natalya.kushnirenko@pncc.govt.nz .

MEMORANDUM

TO: Sustainability Committee

MEETING DATE: 16 April 2025

TITLE: Local Water Done Well - Summary of Submissions

PRESENTED BY: Olivia Wix, Manager Communications, Mike Monaghan, Manager 3 Waters and Julie Keane, Transition Manager

APPROVED BY: Danelle Whakatihi, General Manager Customer & Community
Chris Dyhrberg, General Manager Infrastructure

RECOMMENDATION(S) TO SUSTAINABILITY COMMITTEE

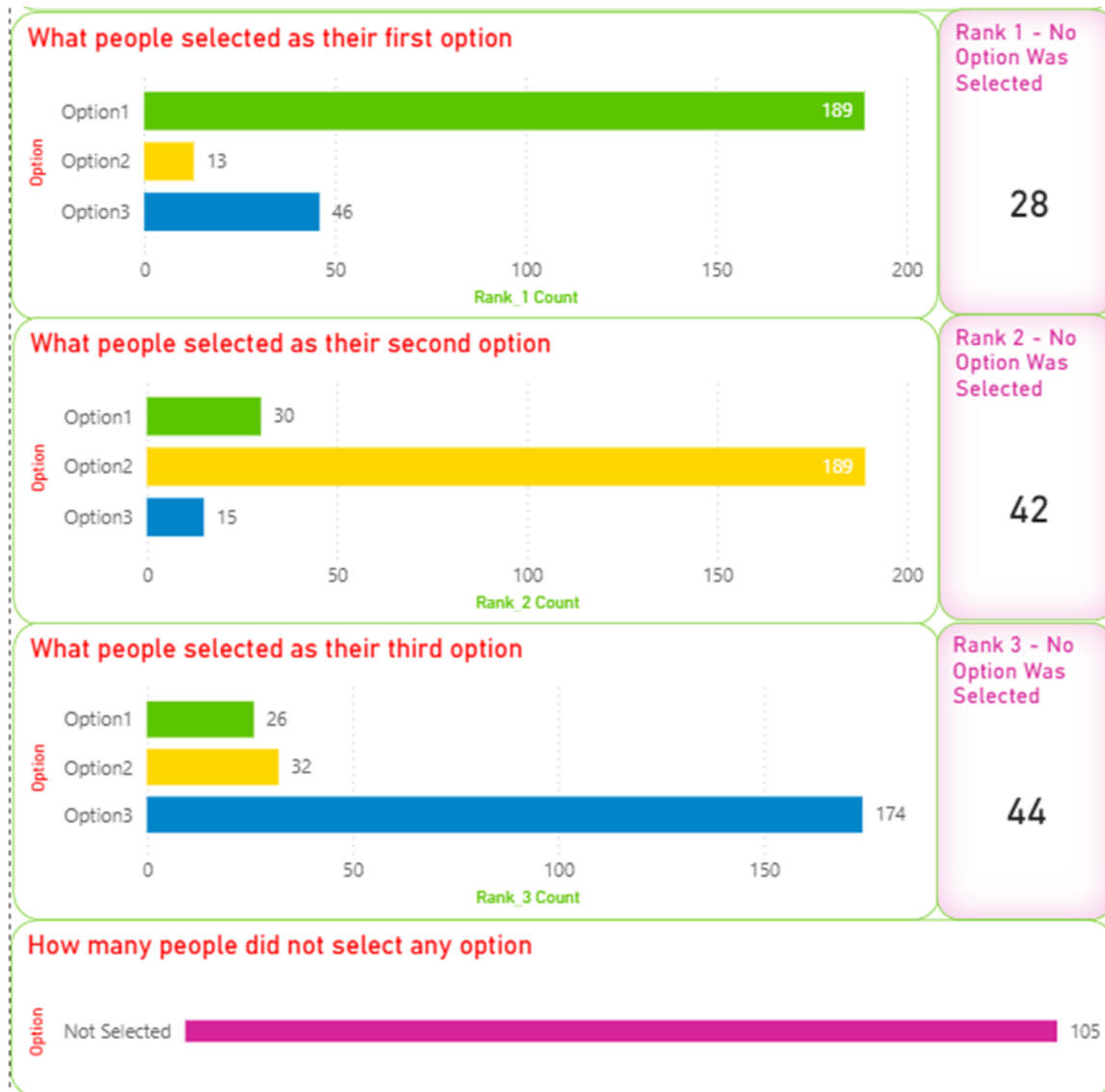
1. That the Committee receive the memorandum titled 'Local Water Done Well – Summary of Submissions,' presented to the Sustainability Committee on 16 April 2025.
 2. That the Committee note that deliberations will be referred to Council.
-

1. ISSUE

- 1.1 Council received 276 submissions on the Local Water Done Well Consultation on future delivery options for water services. Twelve submitters indicated they wish to make an oral submission.
- 1.2 This memorandum provides an initial summary of the key themes raised in the written submissions. A full analysis of the written and oral submissions is expected to be provided to Council in May.

2. BACKGROUND

- 2.1 On 5 December 2024, Council approved three options to take to public consultation on the future of Palmerston North's Water Service Delivery.
- 2.2 On 12 February 2025, Council approved the consultation document that outlined the options and additional information to assist with community understanding of Local Water Done Well policy.
- 2.3 The submission period was open from 27 February to 30 March 2025. Council received 276 written submissions during this time. The submissions are included in the Agenda.
- 2.4 Submitters overwhelmingly supported Option 1, to collaborate with Manawatu, Horowhenua and Kāpiti Coast District Councils. When asked for their second choice, Option 2 came out on top.



2.5 A large number of people chose not to rank the options. Through our conversations at engagement events we had a number of questions about what would happen if Kāpiti Coast or Manawatu didn't have collaboration as a preferred option, so they didn't know how they wanted to rank the options. We encouraged them to still submit so we could still capture their values and also their commentary on how they felt about options.

The form also gave submitters the ability to rank which values mattered most to them. They were able to choose 6 out of 11 options.



2.6 To ensure Elected Members have a thorough understanding of community views, at the Council meeting an extensive report will detail how different groups of submitters feel (eg. age groups, trade waste customers, connected to supply), as well as themes for each option and summaries of other comments.

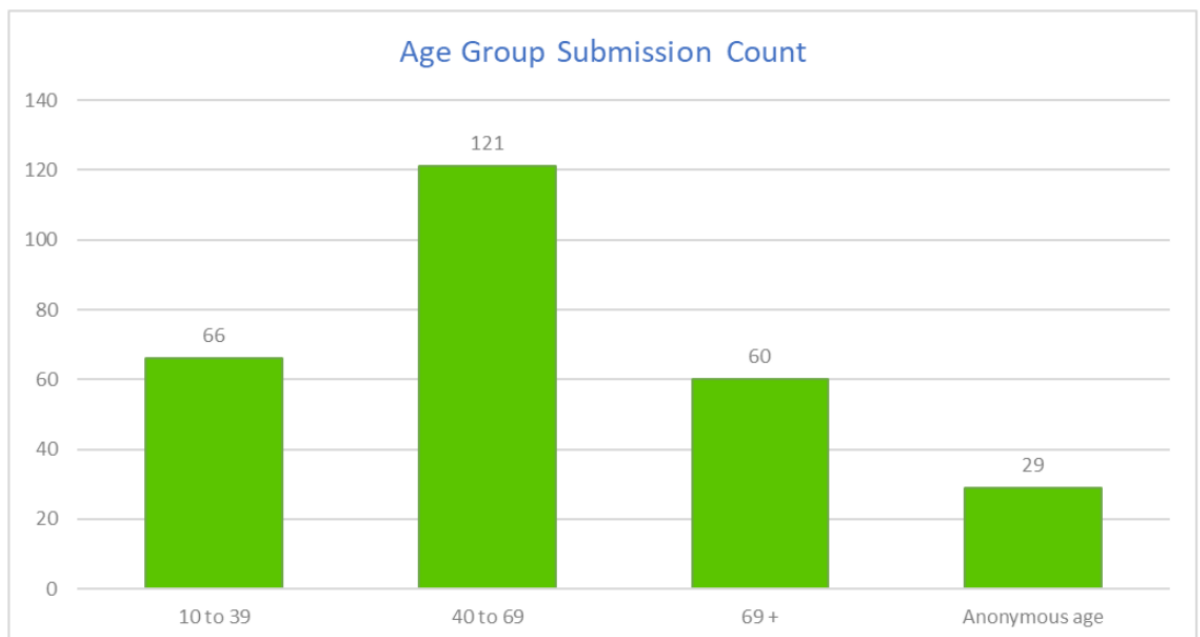
2.7 Overall key themes at this point are:

- That people want an affordable option for the future and are open to collaborating with any councils.
- Most view collaboration positively and recognise the importance of scale. However, some submitters are keen to see us work with a smaller number of councils, eg. 4 or 5, rather than a larger model for ease of governance.
- People are keen to see us collaborate with our closest neighbours as a priority – including Manawatu and Horowhenua. Some submitters are also keen to see us work with Tararua so we're working with all councils around our boundary.
- Some submitters have raised concerns about Kāpiti and Manawatu councils not having collaboration as their preferred option, and what that means for us.
- Many submitters think we should be continuing to deliver water services as we are now and are disappointed we cannot. Some also questioned why a Standalone CCO option had not been included in our options for consultation.

- There is some concern regarding lack of community input, and the timeframes involved for such a decision.
- There are also a number of comments supporting iwi involvement in any governance structure.
- Whilst not asking about water meters and water tanks specifically, a large number of submitters have made comments on the pros and cons of these.
- Some submitters are concerned about the use of fluoride in our drinking water.

2.8 Most submitters lived in our district and were connected to our water supply. We only had a small number of people from outside our district submit, and only a small number of people not connected to our supply submit. Based on our conversations with rural communities during consultation we expect this is because they don't see this as impacting them. We also had around ten of our trade waste customers make submissions.

2.9 We had a wide range of age groups submit during the consultation period. A breakdown is shown in the graph below.



Engagement

2.10 Throughout the consultation period there was a significant amount of community engagement, similar in scale to our Long-Term Plan. A full summary of the methods we used, sessions and themes from each of these will be provided in the report to Council.

2.11 Generally, people said they supported the preferred option and our reasoning, and many commented they wouldn't make a submission for that reason.

3. NEXT STEPS

3.1 Officers will provide analysis of all the issues raised in the written and oral submissions and provide advice and recommendations to Council.

4. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide?	Yes
Are the decisions significant?	No
If they are significant do they affect land or a body of water?	No
Can this decision only be made through a 10 Year Plan?	No
Does this decision require consultation through the Special Consultative procedure?	No
Is there funding in the current Annual Plan for these objectives?	Yes
Are the recommendations inconsistent with any of Council's policies or plans?	No
The recommendations contribute to: Whāinga 4: He tāone toitū, he tāone manawaroa Goal 4: A sustainable and resilient city	
The recommendations contribute to this plan: 13. Mahere wai 13. Water Plan The objectives are: <ul style="list-style-type: none"> • Provide safe and readily available water • Manage city wastewater 	
Contribution to strategic direction and to social, economic, environmental and cultural well-being	Water services have undergone significant reform in the past few years. The National-led Government has repealed the previous government's Three Waters programme and replaced it with 'Local Water Done Well'. The Government is still working through the details of what this reform involves including the finalising of key policy, but it does include local government retaining ownership of water assets. Councils are being encouraged to form regional groupings (to get the benefit of scale) and Council-Controlled Organisations (to be able to borrow funds without affecting Council balance sheets).

ATTACHMENTS

Nil

PALMERSTON NORTH CITY COUNCIL

Minutes of the Sustainability Committee Meeting Part I Public, held in the Council Chamber, First Floor, Civic Administration Building, 32 The Square, Palmerston North on 19 February 2025, commencing at 9.01am

Members Present: Councillors Brent Barrett (in the Chair), Kaydee Zabelin, Roly Fitzgerald, Patrick Handcock, Leonie Hapeta, Lorna Johnson, Debi Marshall-Lobb and Karen Naylor.

Non Members: Councillors Vaughan Dennison and Lew Findlay.

Apologies: The Mayor (Grant Smith) (late arrival, early departure on Council business), Councillor Roly Fitzgerald (early departure).

The Mayor (Grant Smith) entered the meeting at 9.21am during consideration of clause 3. He was not present for clauses 1 and 2.

Karakia Timatanga

Councillor Brent Barrett opened the meeting with karakia.

1-25 Apologies

Moved Brent Barrett, seconded Kaydee Zabelin.

The **COMMITTEE RESOLVED**

1. That the Committee receive the apologies.

Clause 1-25 above was carried 10 votes to 0, the voting being as follows:

For:

Councillors Brent Barrett, Kaydee Zabelin, Roly Fitzgerald, Patrick Handcock, Leonie Hapeta, Lorna Johnson, Debi Marshall-Lobb, Karen Naylor, Vaughan Dennison and Lew Findlay.

2-25 Confirmation of Minutes

Moved Kaydee Zabelin, seconded Patrick Handcock.

The **COMMITTEE RESOLVED**

1. That the minutes of the Sustainability Committee meeting of 4 December 2024 Part I Public be confirmed as a true and correct record.

Clause 2-25 above was carried 8 votes to 0, with 2 abstentions, the voting being as follows:

For:

Councillors Kaydee Zabelin, Roly Fitzgerald, Patrick Handcock, Leonie Hapeta, Lorna Johnson, Karen Naylor, Vaughan Dennison and Lew Findlay.

Abstained:

Councillors Brent Barrett and Debi Marshall-Lobb.

3-25

Deliberations report on Te kaupapahere mō te tūwhita me te manawaroa o te kai Food security and resilience policy

Report, presented by Julie Macdonald, Strategy and Policy Manager.

The Mayor (Grant Smith) entered the meeting at 9.21am.

Moved Kaydee Zabelin, seconded Patrick Handcock.

The **COMMITTEE RECOMMENDS**

1. That the Committee recommend Council adopt *Te kaupapahere mō te tūwhita me te manawaroa o te kai* Food security and resilience Policy, Attachment 2 of this memorandum.

Clause 3-25 above was carried 10 votes to 0, with 1 abstention, the voting being as follows:

For:

Councillors Brent Barrett, Kaydee Zabelin, Roly Fitzgerald, Patrick Handcock, Leonie Hapeta, Lorna Johnson, Debi Marshall-Lobb, Karen Naylor, Vaughan Dennison and Lew Findlay.

Abstained:

The Mayor (Grant Smith).

4-25

Wastewater Treatment Plant - Nature Calls: Quarterly Update

Memorandum, presented by Mike Monaghan, Manager Three Waters and Anna Lewis, Project Manager – Wastewater Discharge Consent Programme.

Officers noted an error in the Budget Table in the report (page 48). The amended table follows (figures in red are correct):

Cost Line	FY Revised Budget	Committed	Forecast	Actual
FY25 TOTAL	\$2,100,000	\$1,214,937	\$1,640,000	\$529,910
BPO	1,213,857	933,880	1,170,000	302,600
Biosolids Strategy	343,143	1,899	100,000	42,354
Project Management	543,000	279,158	370,000	184,956

Moved Brent Barrett, seconded Kaydee Zabelin.

The **COMMITTEE RESOLVED**

1. That the Committee receive the report titled 'Wastewater Treatment Plant – Nature Calls: Quarterly Update' presented to the Sustainability Committee on 19 February 2025.

Clause 4-25 above was carried 11 votes to 0, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Brent Barrett, Kaydee Zabelin, Roly Fitzgerald, Patrick Handcock, Leonie Hapeta, Lorna Johnson, Debi Marshall-Lobb, Karen Naylor, Vaughan Dennison and Lew Findlay.

5-25

Committee Work Schedule

Moved Brent Barrett, seconded Kaydee Zabelin.

The **COMMITTEE RESOLVED**

1. That the Sustainability Committee receive its Work Schedule dated February 2025.

Clause 5-25 above was carried 11 votes to 0, the voting being as follows:

For:

The Mayor (Grant Smith) and Councillors Brent Barrett, Kaydee Zabelin, Roly Fitzgerald, Patrick Handcock, Leonie Hapeta, Lorna Johnson, Debi Marshall-Lobb, Karen Naylor, Vaughan Dennison and Lew Findlay.

Karakia Whakamutunga

Councillor Brent Barrett closed the meeting with karakia.

The meeting finished at 9.46am

Confirmed 16 April 2025

Chair

MEMORANDUM

TO: Sustainability Committee

MEETING DATE: 16 April 2025

TITLE: Annual Sector Lead Report: Environment Network Manawatū

PRESENTED BY: Amy Viles, Community Development Advisor

APPROVED BY: Danelle Whakatihi, General Manager Customer & Community

RECOMMENDATION(S) TO SUSTAINABILITY COMMITTEE

1. That the Committee receive the memorandum titled 'Annual Sector Lead Report: Environment Network Manawatū' presented to the Sustainability Committee on 16 April 2025.
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1. ISSUE

- 1.1 Environment Network Manawatū (ENM) is delivering its third annual report (January–December 2024) as a Sector Lead organisation, which is appended to this memorandum as Attachment 1.
- 1.2 Reporting to Council is required under the Sector Lead Partnership Agreement structure.
- 1.3 Analysis of the performance of ENM against agreed activities and outcomes is included in this memorandum below.

2. BACKGROUND

- 2.1 On 8 June 2022, Council resolved to engage ENM as a Sector Lead organisation.
- 2.2 The Sector Lead Partnership model was trialled from 1 July 2022 – 30 June 2023, and was approved to continue, as per Council's resolution of 18 December 2023:

'That Council approve the continuation of the Sector Leads Partnership model in principle, as per the Support and Funding Policy 2022, and note that appropriate budget will be established for Sector Lead partners within the draft 2024-2034 Long-Term Plan.'

- 2.3 A three-year Partnership Agreement commenced between ENM and the Council in July 2022. The Agreement stipulates that activities funded

contribute to the achievement of priorities 1-3 within the Council's 2021-2031 Eco City strategic direction.

- 2.4 Reporting requirements within the Agreement include an annual report to Council covering the activities delivered and outcomes achieved in the preceding period.

3. ANNUAL REPORT ANALYSIS

- 3.1 ENM are the central environment member-led organisation in the Manawatū. They provide vital leadership, capability and capacity building opportunities for the Palmerston North environmental community and the public, with a particular focus on collective community action with environmental groups. ENM also provide advice, information, advocacy and human resources for the environmental sector within the wider Manawatū.
- 3.2 ENM have 65+ member groups and are currently funded by Council to deliver two key initiatives (Manawatū Food Action Network and Manawatū River Source to Sea) and to administer the Environmental Initiatives Fund (EIF). Manawatū Food Action Network (MFAN) leads and supports community-led initiatives to address food resilience building in the Manawatū. Manawatū River Source to Sea (S2S) incorporates a network of initiatives focused on the biodiversity of the Manawatū River catchment community.
- 3.3 Under the ENM Strategic Framework 2024-2027, four pou or key priorities have been identified for future focus and development, introducing a formal widening of scope and include: Climate Action, Biodiversity Protection and Enhancement, Community Food Sovereignty and Circular Economy. The four new pou of ENM align with and sit broadly across Council plans in the 2024-2034 Long-Term Plan including: Climate Change and Sustainability, Biodiversity and the Manawatū River, Resource Recovery plans.
- 3.4 ENM allocates a portion of their Sector Lead Partnership funding to fund the Environmental Initiatives Fund (EIF), which is administered by ENM to support Palmerston North based community initiatives that improve environmental outcomes. Small grants (up to \$1,000) and large grants (between \$1,000 to \$12,000) are available for projects that align with Council's 2021-2031 Eco-City Strategy. The EIF also now includes an additional \$30,000, allocated to the fund through the Long-Term Plan for kai resilience initiatives, as per Council's resolution of 29 May 2024:

'That Council increase the funding provided to Environment Network Manawatū through the Sector Lead Partnership Agreement for the Environmental Initiatives Fund by \$30k per annum to support food security projects and inform the development of a city-wide food security and resilience policy.'

- 3.5 Additional to Council funding, ENM receives multiple and diverse sources of funding across their initiatives, including funding from the Department of Internal Affairs (Lotteries), Ministry for the Environment, Environment Hubs

Aotearoa, Horizons Regional Council and Eastern and Central Community Trust (ECCT). ENM works towards meeting several different investment outcomes through its activities and, therefore, their report includes activities that are not solely funded by Council.

- 3.6 While the Sector Lead Agreement specifically covers initiatives that focus on the city of Palmerston North, staff acknowledge that work completed by ENM initiatives have far broader impacts on the wider Manawātū Region. ENM provide sector leadership in both a citywide and regional capacity.
- 3.7 The amount of funding ENM receives through the current Sector Lead Partnership Agreement is \$165,000 per annum (plus GST). Funding has been adjusted for inflation in years two and three, with an additional pro rata allocation of funding in year three from the increased Strategic Priority Grant funding allocated by Council through the Long-Term Plan 2024-2034 deliberations. Funding for the current financial year totals \$189,849.

Assessment of agreed activities

Strategic Alignment	Activity	Comment	Assessment (Not met; developing; or met)
Eco City Activities			
Priorities 1, 2 & 3	Facilitate a membership network of environmental groups and deliver environment related education initiatives.	ENM are performing well in this area. ENM continue to maintain a strong membership base and to grow their reach into the community. Rebalancing the focus within the membership base is being prioritised in the ENM Strategic Framework 2024-2027.	Met
Priorities 1, 2 & 3	Umbrella two collective action networks: Manawātū River Source to Sea and Manawātū Food Action Network.	ENM continues to demonstrate strong performance and focus on the Manawātū Food Action Network. Due to limited resourcing, the focus and demand of the Food Action Network has impacted on the ability of ENM to share equal focus on Source to Sea (evidenced by satisfaction of the Source to Sea membership in the annual reported data. See analysis for further commentary). Securing and maintaining sufficient funding to ensure ENM can deliver on	Developing

		all priority outcomes is an ongoing challenge. However, ENM have a strong focus on the development and retention of volunteers to support organisational stability.	
Priorities 1, 2 & 3	Administer the Environmental Initiatives Fund in support of community-led environment initiatives.	ENM are performing well in this area. With additional funding from Council, ENM have been able to ensure the scope of the EIF continues to grow. ENM have expressed aspirations to grow the EIF into a regional fund, which is in line with their Sector Leadership.	Met
Sector Leadership activities			
Priority 1, 2 & 3	Provide capacity-building and support for other community organisations to develop and connect;	ENM are performing well in this area. ENM work with other environmental organisations in Palmerston North, across neighbouring regions and nationally through the Environment Hubs Aotearoa (EHA) network and other national networks to support the development and promotion of environmental initiatives. ENM continues to deliver the quarterly MFAN hui as an opportunity for food organisations to gather and work collaboratively and have plans to extend this model of collaboration to their other areas of focus (pou) in their strategic plan.	Met
Priorities 1, 2 & 3	Deliver the highest level of expertise and highest quality service;	ENM are performing well in this area. ENM have a commitment in their 2024-2027 Strategic Framework to refocus their resourcing on providing the 'scaffolding' for project development of member groups rather than delivery and implementation. Strong partnership collaboration. Some examples include leading the Kai Resilience Squad for Ora Konnect and providing advice on a community-led development project at Ahimate Reserve.	Met

Priorities 1, 2 & 3	Think, work and advocate strategically;	ENM are performing well in this area. ENM are a subject matter expert for the environment and provide sound information and advice to Council on a regular basis. In the last year this included the consultation for the Ashhurst Domain, the development of Te kaupapahere mō te tūwhita me te manawaroa o te kai Food Security and Resilience Policy and the Food Scraps Collection trial.	Met
Priorities 1, 2 & 3	Have robust strategic and business plans in place.	ENM are performing well in this area. Development of their Strategic Framework 2024-2027, in collaboration with member groups, has formed the foundation of an Action Plan to guide the organisation now and in the future, with a focus on Sector Leadership, building capacity and capability and creating community.	Met

- 3.8 Alongside an annual report which provides information on the agreed activities, Sector Lead organisations are required to provide six-monthly performance measure data for a range of indicators related to their activities.
- 3.9 The measures are based on a Results Based Accountability approach, where impact of effort is demonstrated by measurement of who is 'better off' as a result of the activities or services, as well as 'how much' of the activity or service was delivered and 'how well' it was delivered. This performance measure data provides an evidence base to support the information in the annual report. Performance measure data for the period 1 January 2024 to 31 December 2024 is appended to this memorandum as Attachment 2.
- 3.10 Staff have combined the reporting of other additional funding ENM have received from Council (Resource Recovery and Waste Minimisation funding) into the Sector Lead Partnership Agreement. The purpose of this move was for ENM to have one reporting mechanism for all forms of funding from Council, and for Council to be able to monitor and evaluate funded outcomes fully and consistently.
- 3.11 Concerns raised by staff in the last annual report that the number of respondents to ENM surveys was insufficient to allow for adequate data analysis for many of the 'How well' and 'Better off' measures has been addressed by ENM and has improved in the last year. Staff will continue to work with ENM going forward to support improved data collection for the

next round of funding. ENM are also adapting their data collection methods to be responsive to feedback from participants and ENM members.

- 3.12 An issue that has been raised from the biodiversity membership base of ENM (and raised for discussion at the last ENM AGM) is also evidenced in the satisfaction data in the last two reporting periods. ENM has been working hard to balance the exponential growth of the organisation with the grass roots foundational values that formed the genesis of ENM. ENM acknowledge that the focus on MFAN and kai resilience initiatives has provided less time and resourcing to focus on other core initiatives of ENM. The board and ENM staff are working to address this balance through their 2024-2027 Strategic Framework and the development and allocation of resourcing for their four pou. Council staff acknowledge that it is testament to the strength of the organisation that ENM members have the foundation to challenge the board and ENM staff on the direction and value base of ENM and that their concerns are heard and responded to, which is balanced with the need for the organisation to deliver an outcomes focus (with accountability to a variety of funders) and steer ENM towards growth and a future focus.
- 3.13 The performance measure data does demonstrate, however, a steady delivery of events, another significant increase in MFAN membership and project delivery, a sound uptake in the Environmental Initiatives Fund and ongoing collaboration with a range of partners achieving a broad range of outcomes.
- 3.14 Concern for securing long-term funding for organisational stability and key initiatives continues to be a challenge for ENM (which is a financial challenge not particular to ENM and is familiar to most for-purpose organisations), however the organisation continues to grow their organisation and reach into the community, locally, regionally and nationally. Overall, ENM continue to go from strength to strength in the delivery of their Strategic Framework.

4. CONCLUSION

- 4.1 This memorandum has provided background to and comment on the annual report of Environment Network Manawātū (ENM) for 2024.
- 4.2 Staff have assessed that ENM are performing well against their agreed activities across the board. The organisation continues to demonstrate significant growth in response to community demand, provide strong advocacy on environmental issues, and has demonstrated that building collaboration across environmental initiatives is a core strength.

5. NEXT STEPS

- 5.1 Staff will continue to support ENM to deliver the wide-ranging activities and initiatives covered by the Sector Lead Partnership Agreement.
- 5.2 In September 2024, staff completed an evaluation to determine continued partnership with ENM as a Sector Lead organisation. It was confirmed that

ENM continue to demonstrate the six criteria of sector leadership, and they were invited to submit a proposal and budget for negotiation of their 2025-2028 Sector Lead Partnership Agreement. Their proposal details their contribution to achieving outcomes that align with Council's goals and outcomes in the Oranga Papaioea City Strategy 2024-2034.

5.3 Staff expect to complete negotiation of the 2025-2028 Partnership Agreement with ENM by the end of March 2025, with the new agreement to begin from 1 July 2025.

5.4 ENM will present its next Annual Report in the first quarter of 2026. Further staff commentary on progress will also be provided at that time.

6. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide? If Yes quote relevant clause(s) from Delegations Manual Clause 4.4: Receive or note any report or memorandum or other information submitted to the Committee.	Yes
Are the decisions significant?	No
If they are significant do they affect land or a body of water?	No
Can this decision only be made through a 10 Year Plan?	No
Does this decision require consultation through the Special Consultative procedure?	No
Is there funding in the current Annual Plan for these objectives?	Yes
Are the recommendations inconsistent with any of Council's policies or plans?	No
The recommendations contribute to: Whāinga 4: He tāone toitū, he tāone manawaroa Goal 4: A sustainable and resilient city	
The recommendations contribute to this plan: 10. Mahere āhuarangi hurihuri, toitūtanga 10. Climate Change and Sustainability Plan 11. Mahere mō te kanorau koiora me Te Awa o Manawatū 11. Biodiversity and the Manawatū River Plan 12. Mahere taumanu para 12. Resource Recovery Plan The objective is: Encourage and promote sustainable best-practice in Council activities and the wider community; Support and fund for-purpose organisations and local communities working to help achieve nature conservation outcomes; Provide support for for-purpose organisations and local communities to recover,	

reuse, repurpose or regenerate products.	
Contribution to strategic direction and to social, economic, environmental and cultural well-being	Sector Lead Organisations contribute to the achievement of Council's strategic direction, particularly Goals 2, 3 and 4, which seek to enhance the social, economic, environmental and cultural wellbeing of the community.

ATTACHMENTS

1. ENM Annual Sector Lead Report [↓](#) 
2. ENM Performance Measure Data 1 January 2024 to 31 December 2024 [↓](#) 

Connecting and inspiring communities for environmental action

ENM Sector Lead Report

For PNCC - March 2025

About ENM

We are the environment hub for the Manawātū region providing sector leadership, building capacity and capability, and creating community.

Understanding that all life is part of a thriving, self-sustaining ecosystem our vision is that the ecological and human communities in the Manawātū River catchment, are living in harmony.

Our Motivations:

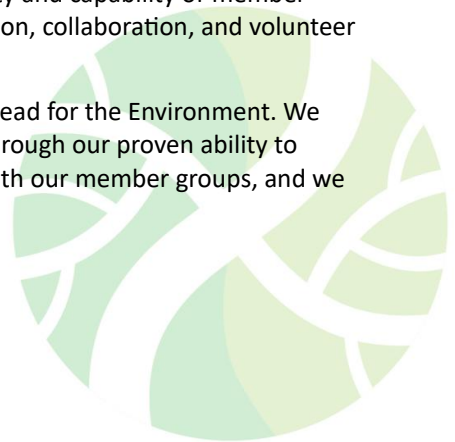
- Our responsibility to care for the earth and each other
- Becoming better Te Tiriti partners
- Collaboration and inclusivity
- A belief that small actions can have a big impact

Our Roles

Our organisation prides itself in our proven ability to create community by bringing together groups from a variety of backgrounds to work towards a common goal. We support emerging and established environmental and food-resilience focussed initiatives to thrive. We encourage strong community connections and provide networking opportunities. We facilitate conversations to identify community needs and provide space and support for community-led solutions to flourish.

ENM has a clear focus on environmental sustainability and recognises that maintaining organisational sustainability will ensure we are functional and effective. We work toward unlocking resourcing for our sector and building the capacity and capability of member groups and the communities we work with through education, collaboration, and volunteer coordination.

ENM is Palmerston North City Council's designated Sector Lead for the Environment. We demonstrate best practice as a member-led organisation through our proven ability to coordinate, communicate, and advocate in collaboration with our member groups, and we support and enable them in their mahi.



Our Pou

Our four pou are the key priorities that guide everything we do at ENM. By focusing on these, we believe we can achieve our vision and make a real difference. These pou, and their actions are outlined in our 2024 – 2027 strategic plan.

Climate Action

Climate action involves taking steps to slow down climate change, such as reducing emissions, reducing wastefulness and overconsumption, having clean air, pushing for climate-friendly policies, and helping build sustainable, living cities. Our goal is to raise awareness about climate issues and help to hold both local and central governments accountable.

We recognise that climate action is closely connected to the other pou, but it needs special attention because it's so important.

Biodiversity Protection and Enhancement

Biodiversity protection and enhancement focus on preserving and restoring the natural environment in our region. Our network in this area, including the Manawatū River Source to Sea (S2S), is working together to improve the health of the Manawatū River catchment—the area of land where rainwater and streams flow into the Manawatū River. We aim to protect and increase native birds, insects, and plants, while also improving the river's water quality.

Community Food Sovereignty

Community food sovereignty is about ensuring that communities have the right to healthy, culturally appropriate food that is grown locally and sustainably. Our network in this area, including the Manawatū Food Action Network (MFAN), works together to help communities grow their own food, make healthy food more accessible, reduce food waste, and provide free or affordable food to people. Our goal is to ensure everyone has access to healthy food that is grown in sustainable ways.

Circular Economy

A circular economy is built around three main ideas: reducing waste and pollution, using only sustainable and biodegradable materials, and reusing things until they can be composted. Our network is working together to promote moving away from plastics, having less, fixing things when we can, finding new homes for good-quality products, and turning used materials like cotton and aluminium into something useful again.

Our Key Functions

Ensuring ENM is being efficient and effective in these key functions is pivotal and underpins all our other roles across the four Pou.

ENM prioritises strengthening relationships with mana whenua and exploring our role as Tangata Tiriti, working towards becoming trusted partners. We focus on supporting and equipping our

membership, providing connection, training, and promotion. We help to scaffold projects in their initial stages, while supporting the development of their long-term financial viability. We distribute the Environmental Initiatives Fund and aim to progress the vision for an Environmental Centre, improve volunteer coordination, and advocate for environmental change. We need to increase our financial resilience and maintain and improve our systems and processes while continuing to collaborate and build relationships within our membership and beyond.

Our Achievements

[Our annual report](#) was published in October 2024 for the 2023/24 year. It provides an in-depth look at our achievements and acknowledges PNCC as a critical enabler of this work. Additional achievements in the period 1 July – 31 December 2024 are outlined below.

“Since we moved to the Manawātū a year ago, my partner and I have been able to participate in some fabulous ENM educational workshops and some fun inspiring volunteering opportunities. I've met new people this way too. I enjoy receiving the newsletter updates.”

Climate Action Pou

Our team has been upskilling by attending workshops aimed at crafting more compelling and impactful change-making communications.

We are encouraging climate action through education and behaviour change programmes. For example, our Future Living Skills programme took place 3 times in 2024, with a total of 26 sessions. These interactive workshops and practical opportunities are designed to help whanau become more sustainable in their daily life. Participants hear from council and community experts on a range of sustainability-based topics, each with their own learning guide, and share their own ideas, challenges, and tips. The group learns from each other through engaging topics such as waste minimisation, gardening, water, energy and travel. We had 92 participants over the course of the year and we've had a lot of positive feedback from people.

“I've been co-facilitating on the Future Living Skills programme and see an amazing sense of community and knowledge sharing being built around sustainable living.”

We also developed and piloted a classroom resource on Bokashi. Composting food waste with the bokashi process does not produce methane. Whereas food waste going to landfill produces methane and contributes to global warming and climate change. Whereas outdoor

aerobic composting is not suitable for dealing with meat and dairy products, or for those with little or no garden, bokashi composting is ideal for both.

Biodiversity Protection & Enhancement Pou

We have worked closely with Arapera Paewai, of Te Kāuru Manawatū Eastern Hapū Collective in the development of the next phase for the Ruahine Kiwi Project. The project has been in a transition phase since the end of the Department of Conservation Jobs for Nature based resourcing at the end of June. Thanks to Icon Project funding and biodiversity team planning support from Horizons Regional Council, we have hired a new Project Lead, Robert Gibb who started on the 6th of January 2025.

A national organisation, Trees for Survival is planning to start working with 5 schools in the region this year, and we've been able to connect them with Te Ao Turoa, who will undertake local seed collection and nursery services to provide up to 1,000 plants per school per year.

In 2024, to address declining attendance at Manawatū River Source to Sea meetings, the members decided to reduce the frequency of the meetings to bi-monthly. However, this change has not significantly improved attendance. Those who do attend say they value these opportunities to connect and want to see them continue. We held a membership meeting in November focussed on how to best support biodiversity groups.

At this membership meeting, we discussed ENM's engagement with our members, and how it could be improved, along with elements of our we could best implement the new strategic plan. There was a desire from the attendees to have more opportunities to engage with each other, with a focus on creating and maintaining connections between the groups. Participants noted that they would like to give feedback in an easier way, as they find repetitive surveys to be tedious and they struggle to see the value in them. Members wanted to hear directly from ENM staff more – through phone calls, rather than only receiving emailed notices.

We acknowledged there has been great support in the past few years for community food sovereignty groups, as we have enjoyed good resourcing and greater capacity for this area, but not as much support available for members in other areas. We discussed balancing out the distribution of resources and capacity toward having a coordinator supporting membership in each pou and aiming towards having at least one hui for each pou every year.

Feedback from the meeting has helped to inform further development of our plans for membership engagement and support going forward, particularly for those in the Biodiversity pou.

We have continued to provide support for biodiversity member groups who approach us often with requests for information, connections or promotion. In addition, we have been approaching our membership in this area to consult with them individually to inform how we can best meet their needs.

Community Food Sovereignty Pou



"MFAN makes real change and brings the means of the most essential production to the people of Palmerston North. I am proud to devote my time and energy to the organisation as I see the benefits in real time."

We have collaborated with Te Tihi on developing and facilitating the Kai Sovereignty Squad and partnered with Ora Kōnnect to develop a joint submission to the PNCC Food Security and Resilience Policy.

We have developed new relationships with Kore Hiakai, investigating the potential delivery of their mana-to-mana session as an upskilling opportunity for kai support workers.

Our ongoing support for food sovereignty leaders has resulted in several initiatives aimed at strengthening and sustaining local projects. MFAN has facilitated hui with Growing Gardens and Communities (GGAC) to discuss the future of their project and share the workload for long-term sustainability. Meetings with community leaders in Roslyn have laid the groundwork for a future community information day, while collaboration with Turitea School's groundskeeper supported their environmental projects. MFAN also assisted PPCT's community garden project by organizing site meetings and connecting them with suppliers for quotes. Additionally, a resource and information kit is being created to provide practical tools and support for food sovereignty leaders.

"A huge positive impact with connections to other people, resources and support with sharing the burden that can overwhelm at times"

Whaea Roberta Kaiwai-Paterangi, the tumuaki (principal) of Te Kura Kaupapa Māori o Manawatū was brought to tears of joy recently thanks to a gardening refresh undertaken by MFAN in collaboration with Growing Gardens and Communities, Kāinga ora, Tahuri Whenua and Guardian Tree Services. Roberta has been wanting to get the kura gardens back up and running for a number of years but had run into many barriers. It was such a privilege to give support the kura community and coordinate this event. It was amazing to see her reaction to the mahi that was done by the end of the day, both with the resultant beautiful garden and with the involvement and energy from the Tamariki of the kura. As the icing on the cake, a raukura (former student) of the kura, now working in media, attended and produced this amazing news piece: <https://www.facebook.com/tereoteuru/videos/889923116282933>

Bringing likeminded organisations and volunteers together to connect, plan and take ideas forward is key to our role, especially within the food resilience space. The Manawatū Food Action Network Hui continue to be well attended, and well received.



- We hosted 3 seasonal Hui during the year and 123 people participated.
- A session for community gardeners was run at the July MFAN Hui, representatives from community gardens contributed to charting the essential resources currently available at each community garden for sharing resources amongst the network.
- During the 2024 Spring Hui, ENM ran a session on the importance of policy, with Kaydee and Bronny Ferry leading an engaging discussion that received positive feedback from attendees.

In addition to engaging with MFAN members through these hui, we have begun consulting one on one with local food sovereignty leaders to better understand their needs, and to inform our future support services. We are checking in on their activities and gathering feedback on areas such as: positives, constraints, resources, communication needs, and more.

"I have gained connections in the food resilience sector and have been inspired to make changes to our physical environment and systems to improve the service we offer our customers."

Support continues to be provided to community gardens through Let's Grow Palmy sessions, other opportunities to impart education and advice, and provision of resources including the seed libraries, tool libraries and Friday morning working bees.

Our MFAN team supported 31 projects during 2024 including advocacy, communication, community education, community composting, Every Bite development, community gardens support, sharing resources including our van and trailer, tools and seed libraries, and encouraging community connections. We assisted Growing Gardens and Communities with 70 garden installations, 62 new gardeners, plus 8 additional visits that included more compost, plants, or garden beds for gardeners we've previously helped. We also installed approximately 10 Kāinga Ora gardens.

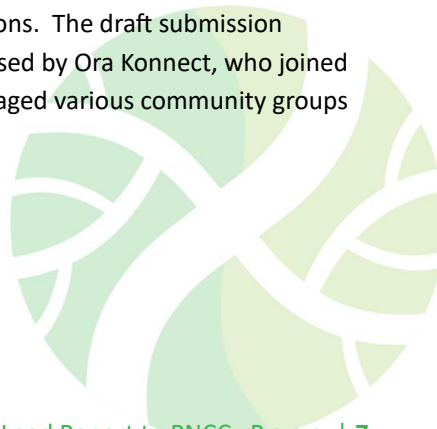
We are pleased to have enticed Cam, a keen and capable volunteer to manage and maintain our seed libraries at five locations on a regular schedule. With his help, we're now able to collect clear data about the uptake of this service. This year, we



have seen a significant increase in the number of people visiting our office to access the seed bank. Over the course of the year, seed packets have been distributed, with recording beginning in September. Since then, 690 seed packets have been distributed.

A garden shed and a 1000L water tank were installed by our Friday working bee volunteers and staff at Te Patikitiki Library maara kai at the end of November. Rainwater can now be diverted from the shed roof into the water tank to provide a water supply that is more accessible for watering the garden than the existing locked tap, especially after hours.

Following several years of advocacy and awareness raising around food sovereignty issues, we were pleased to actively support the PNCC consultation on the Draft Food Resilience and Security Policy, co-hosting one of the key consultation sessions. The draft submission garnered strong community support and was further endorsed by Ora Konnect, who joined us in submitting a joint response. Additionally, ENM encouraged various community groups to submit their own support for the policy.



"I just wanted to thank you and ENM for your contribution to this policy development process. We (Council) benefited from your collective wisdom."

Julie Macdonald, PNCC Manager Strategy and Policy

We acknowledge those within the policy development team who worked hard to ensure this policy was developed in a meaningful way, and the elected representatives who agreed to adopting and implementing this policy following public consultation.



PNCC also approved the new Community Gardens Guide at the Sustainability Committee meeting on Wed 4 Dec. The initial feeling from the community is that this is a hugely positive step towards making Community Gardens easier to develop on public land. We are proud of the community connections we have provided and the input we were able to provide to support the development of this new and improved guide.

Circular Economy Pou

We have invited mana whenua involvement and input into our work in this space. Our initial conversations with mana whenua indicate a mutual willingness for ongoing kōrero. We have offered support where we can, with our team providing equipment and participating in Whakapai Hauora team's environmental days.

With support of Horizons Freshwater Fund, and with input from the Te Ao Turoa team, we have been developing a new Guide for Stream Cleanups – aimed to provide information, resources, planning documentation and support links to encourage and support community members who want to get their friends, whanau or colleagues out to clean up the streams.

"I've learnt a lot about gardening with growing gardens and communities and I have changed many aspects of my life through information gained at

Future Living Skills... Manawatū Food Action Network hui are great for learning what is happening. The Rubbish clean up you did a few months back has sparked my daughter's new year resolution to go park cleaning every weekend or two for the year. There is much more I'm forgetting also."

Our partnership with Menzshed and Supergrans Manawatū in running the Palmerston North Repair Café continues to go from strength to strength, attracting 15-20 regular volunteers, who enjoy using their skills to repair people's valuable belongings. 217 repairs were made during the year. Repair Café visitors continue to increase as people become aware of the service, and both Menzshed and Supergrans have enjoyed increased volunteer engagement and interest in their services through their presence at the repair café. As well as diverting waste from landfill, the Repair Café also increases community cohesion, and whanau financial wellbeing.

The café committee continue to appreciate ENM's support through administration, communications and coordination which has enabled them to become a strong group who are making a large impact in the community. A small rebrand has been implemented to create stronger brand recognition and systems have been improved for logistics and reporting.

This year, we have also trialled delivering workshops alongside the repair café to help educate participants on how to fix some of their own items, which have proven to be popular and effective. An overlocker and sewing machine workshop attracted 24 participants, while 'Getting the right glue' saw 15 people attend.

As a result of the Repair Café, we were approached by a representative from a Whanganui based library who we could connect with our bookmender, Anne toward working with her to upskill in this area. Our impact is beyond our region, and there is the opportunity for specialist skills to be shared further afield, providing a practical example of ENM's sector leadership role in this space.



We also met with both local PNCC MP, Tangi Utikere, and Manawātū District MP Suze Redmayne regarding the Repair Café and the Right to Repair Bill, which we encouraged their understanding and support of.



This year, we have discontinued our Terracycle recycling service, but have developed a lids collection service, inviting the public to drop off 2, 4 and 5 plastic lids as well as metal lids, which can all be processed locally. Bottle top sorting is moving towards being self-sustaining with regular volunteers who understand what they are doing helping to organise and lead the sorting sessions. There is a lovely hub of activity and friendly conversation in the showroom every Thursday. Between July and December 11kg of plastic bottle tops,

24kg aluminium and 17kg steel were collected.

Through our community composting trial, delivered in partnership with Go-Bio, and through conversations at Manawātū Food Action Network hui, we've identified that Community Composters would benefit from being better connected and supported. We are fostering this emerging interest through continuing to support food waste collection points at Te Whare Koha and Jireh Food Hub. The process is simple, effective, and scalable citywide. We trialled instructional signage for the composting bays to ensure aerobic composting rich in organic matter. The network was also promoted to the Esplanade Gardener's Group through a presentation.

Additionally, we have re-homed a solar powered composting unit designed by Go-Bio to PN Girls High School for use by their sustainability club, and delivered a Bokashi composting session at Central Normal School, providing equipment and resources and child-friendly instructions that can now be lent out for similar school sessions.



Key Functions Progress

Strategic Focus

Following a strategy review, the ENM Board and staff developed a robust action plan through a series of workshops and discussions. A working draft of the ENM Strategic Plan was circulated to members in August 2024 and discussed at the 2024 AGM, with feedback

incorporated into the final version. ENM Staff and Board are now working to implement the 2024-27 ENM Strategic Framework.

In reviewing our role within the sector, we recognised that ENM has increasingly been involved in project delivery. However, we believe we can have a greater strategic impact by focusing on our core roles: sector leadership, building capacity and capability, and fostering community within our priority pou: climate action, biodiversity protection and enhancement, community food sovereignty, and the circular economy.

Tangata Tiriti

The ENM Board has regular conversations on how to be an effective Tangata Tiriti organisation with a focus on consolidating and building relationships with mana whenua to better support them in achieving their environmental priorities.

ENM promoted and supported the Toitū Te Tiriti movement and hikoī through our communications channels and was a signatory for Te Pū Harakeke's submission opposing the Treaty Principles Bill.

We continue to upskill staff to learn how to better understand what Te Tiriti means, as well as providing opportunities to explore ideas of colonial culture, privilege, values, beliefs, power dynamics, and ways to work toward a more equitable society.

Environmental Initiatives Fund

We are in the 5th year of administering the Environmental Initiatives Fund and have distributed over \$224k since 2020, with 20 grants distributed throughout the 2024 calendar year.

A summary of some of the grants made in 2024 is available on our website: [ENM's 2024 Environmental Initiatives Fund](#). It is great to see that the EIF continues to attract applications from both established organisations as well as new or emerging initiatives.

One of the successful applicants was Just Zilch, who received a large grant which enabled them to increase their storage capacity, from 14 tonnes to nearly 20 tonnes, allowing them to store more food on-site and get it out quickly and efficiently.

In addition to distributing the funds, we also support people to be able to successfully access the EIF. For example, we were able to support an individual who was struggling with the application process. Her goal was to help her local community have access to more food and a space to share any surplus. Through our support and connections with Menzshed, who will undertake the building work, her application for a small grant to install a Pātaka Kai on Highbury Ave was successful.

Communications, Promotion and Education

We are continuing to grow our following through our communications, promotion and education. This year, our reach has increased, with 337 additional followers on social media,

10k more visits to our website than last year. In the past year, our Facebook posts reached 56.5k people, and we gained 190 newsletter sign-ups.

“ENM newsletters are crucial to keeping all Manawatū groups with an environmental focus up to date with all that is happening in the wider environment space.”

We have undertaken a review of our website, and developed a plan for creating an updated, engaging, user-friendly website that provides member groups and community users information that is relevant and useful. We have started to implement some minor changes to the current website with a new look front page, updates to some of the project information pages and removal of any duplicate information.

We’ve developed communications plans for the four pou that prioritise telling member stories. We are creating social media posts about upcoming events and sharing member group posts during the week. We have updated the layout of our showroom so visitors can more easily access information about the four pou and find out how they can get involved in membership activity within these areas.

Bringing People Together

ENM held its AGM on the 24th of October, celebrating the many achievements of our now 66 member groups.

ENM supported the development of a new group, Natural Burials Manawatū through providing initial communications, coordination and hosting of a public meeting. Participants were invited to a follow-up meeting



hosted at our office, allowing those who were keen to see the idea flourish work together to form a group. The group, which continues to use the ENM Office space to meet regularly to organise their efforts, has been very active in advocating for a local natural burial site and was particularly vocal in the recent review of the Ashhurst Domain. Thanks to these efforts, a natural burial site has been included in the draft plan.

Membership Support

ENM’s effective sector leadership is demonstrated through the support we provide for our members. Supergrans Manawatū and Wildlife Foxton Trust have both expressed

appreciation to ENM in our support for their funding aspirations. Nola Fox said, “Wildlife Foxton was successful in getting a free subscription for the GEM grants calendar and it looks really interesting to support work down here in the estuary.” Joanne Baird said, “Just want to thank you again for your help with my grant application. I know you were very busy so do appreciate you taking the time. I think I probably can't say no to your next request!!!”

The next 12 months; insights, challenges, and opportunities ahead

We are working towards implementing our strategic plan. Please see it attached for our 3-year goals in detail.

Climate Action

Over the next three years, we aim to develop the climate action pou by supporting advocacy campaigns, strengthening our partnerships with local government and community groups, and securing funding for dedicated climate action coordination. This will enable us to build a proactive network of member groups focused on climate advocacy and sustainability initiatives.

This is an emerging area for us and as we move into action the workstreams will likely develop further.

Biodiversity Protection and Enhancement

To support Manawatū River Source to Sea (S2S) to achieve its strategic goals, we need more capacity to provide support, and we’re working at finding solutions to resourcing this.

After years of dedicated service, Vicky has stepped down from the chairperson’s role for S2S. We’re engaging with S2S members to better serve the needs of our Biodiversity Groups. Our recent survey indicates that people want to keep meeting, and we have pencilled in at least two Biodiversity Pou meetings for 2025.

We have been working with Trees for Survival towards a potential partnership, which will provide us with a contract to provide facilitation services to schools in the programme. The plan is to use the associated income as a start point toward funding a Biodiversity Lead.

In addition, the current conversations toward additional Environmental Initiatives Fund resourcing (see note under Key Functions below for detail) have had a focus on needing enough resource to coordinate/facilitate and support groups to access and utilise the fund – in the hope this generates sufficient resource for a Biodiversity Lead role.

The Ruahine Kiwi Project lead will work with ENM and Te Kaūru to help re-invigorate a strong governance team to build the project’s sustainability. Horizons are supportive of the approach we are taking to establish a strong foundation for the project.

Community Food Sovereignty

Nationally, we're seeing rising food demand and decreasing supply, with even established groups like Just Zilch, Te Whare Koha, and Te Pātaka Kai 4412 noticing the impact. There's also a concerning rise in vandalism and theft of trees and plants across the city. While we understand times are tough, we must help communities address security and reduce these incidents.

It is pleasing to have additional resourcing to distribute through the Environmental Initiatives Fund to groups working toward Community Food Sovereignty.

To support gardeners, we'll promote the free resources available, such as ENM's shared van, tools, and seed libraries, and encourage community groups to use the community gardens guide.

We will be working on impact research and collaborating with Massey academics over the coming year to develop food sovereignty resources for the region.

Circular Economy

With a new role beginning at the start of 2025, we have increased capacity to further develop this Pou. We aim to establish and support a strong and proactive network of member groups who use best practice solutions and are focused on promoting and educating our community about living according to a circular economy.

We are about to launch a stream cleanup toolkit and guide soon, and will undertake a promotion campaign to encourage people to carry out their own clean-ups and become kaitiaki of sections of the streams.

A key concern raised by the community is the inability to recycle soft plastics, despite services being available in Masterton, Levin, and Whanganui. It would be beneficial if there was a local solution to this.

Key Functions

We have significant membership consultation to undertake this year, as we move into a phase of reviewing our constitution to ensure that we comply with the 2022 Incorporated Societies Act.

We are working toward developing a financial resilience plan by the middle to end of 2025. Once developed, this will provide a framework for implementation and assessment of our organisation's resilience, and relevant experience, which we hope to share with members.

We are in talks aimed at expanding the scope and reach of the Environmental Initiatives Fund. With additional resourcing from additional partner/s, we aim to increase the amount of funds available and make them available beyond the Palmerston North City boundaries, expanding to include ENM's whole rohe - the Manawātū River catchment area.

We have not yet had the capacity to clearly define our vision for an environmental centre. We aim to prioritise this through our Pou conversations in the coming year, which will help create a community-led vision, outline key priorities, and identify “stepping stones.” We will also continue to advocate for council support in a feasibility study.

Our website is a valuable tool, and we plan to improve it further. However, updating it is costly, so we are seeking additional funding to support this work.

Implementing the 2024-27 ENM Strategic Plan is our key focus. To support this, we are designing a version of the Plan that clearly communicates our goals to a wider audience. To deliver the plan, we need a Lead role for each of the four Pou and increased capacity to support our Key Functions workstreams. We are working toward increasing resourcing to enable successful delivery of the plan over the next two and a half years.



ENM Performance Measure Data for period 1 Jan 2024 to 31 Dec 2024

[NB: Additional performance measures added in this reporting period, align with the ENM Sector Lead contract variation (added in year three of the fund), which includes Resource Recovery/Waste Minimisation funding for the Repair Café and Future Living Skills programme and \$30K of additional funding, allocated by Council in the Long-Term Plan to the Environmental Initiatives Fund (EIF) for kai resilience projects.]

RBA	Performance Measure	1 July 2022 - 31 Dec 2022	1 Jan 2023 – 30 June 2023	1 July 2023 – 31 Dec 2023	1 Jan 2024 - 30 June 2024	1 July 2024 - 31 Dec 2024
'How much'	Total number of members of ENM	65	66	68	65	66
	Total number of events and/or activities delivered for members of ENM	9	9	12	11	13
	Total number of Manawatū Food Action Network (MFAN) members	45	267	352	427	457
	Total number of projects supported by MFAN	12	16	24	26	27
	Total number of Manawatū River Source to Sea (S2S) members	34	34	34	33	34
	Total number of projects supported by S2S	20	10	16	10	10
	Total number of Environmental Initiatives Fund (EIF) grants allocated (current new funds)	3	16	5	13	7
	Total number of ENM volunteers across the organisation	171	277	142	263	73
	Total number of EIF grants allocated for Kai Resilience projects					7 EIF grants allocated (6 Kai resilience projects, 3 of those new)
	Total number of visitors to the Repair Café					324 (across 5 Repair Cafes)

	Total number of Future Living Skills workshops delivered					8
34 'How well'	Percentage of ENM members who report they were highly satisfied/satisfied with ENM activities	86.4% (19/22)	90.9% (10/11)	91.6% (11/12)	100% (19/19)	69.2% (9/13)
	Percentage of members who report they are highly satisfied/satisfied with S2S activities	87.5% (7/8)	83.3% (5/6)	80% (4/5)	69.2% (9/13)	40% (4/10)
	Percentage of members who report they are highly satisfied/satisfied with MFAN activities	86.2% (25/29)	82.1% (23/28)	85% (17/20)	76.4% (26/34)	86.9% (20/23)
	Percentage of participants at ENM events who report being highly satisfied/satisfied with the event	92.1% (35/38)	95.1% (39/41)	97.2% (35/36)	90.9% (50/55)	92.3% (36/39)
	Percentage of the EIF supporting new Kai Resilience projects					42.86% (3/7)
	Total number of items repaired at Repair Cafe					217
	Total number of participants at Future Living Skills workshops					128 participants (32 individuals across 8 workshops, some participants attending multiple workshops)
'Better off'	Percentage of participants who report they learnt something new as a result of attending an ENM event	100% (37/37)	87.8% (36/41)	85.3% (35/41)	88.5% (62/70)	88.5% (62/70)

	Percentage of ENM members who report they feel better connected to other environmental groups as a result of ENM	91.3% (21/23)	90.9% (10/11s)	91.6% (11/12)	94.7% (18/19)	76.9% (10/13)
	S2S: Percentage of members who report they are better connected to other river action groups as a result of S2S	75% (6/8)	66.6% (4/6)	80% (4/5)	46.1% (6/13)	60% (6/10)
	MFAN: Percentage of members who report they are better connected to other food resilience groups as a result of MFAN	86.2% (25/29)	78.5% (22/28)	86.2 (19/25)	84% (42/50)	92.5% (50/54)
	Percentage of EIF recipients who report they were able to successfully deliver their initiative as a result of the grant (reporting on previously administered grants)	100% (5/5)	100% (10/10)	100% (5/5)	100% (12/12)	8
	Number and percentage of EIF Kai Resilience recipients report that they were able to successfully deliver their initiative as a result of the grant	-	-	-	-	62.5% (5/8)
	Estimated amount (in kgs) of waste diverted from landfill for the Repair Cafés	-	-	-	-	520 kg
	How confident do participants feel about applying their learnings in their everyday lives	-	-	-		17/17 of survey responses (100%)

MEMORANDUM

TO: Sustainability Committee

MEETING DATE: 16 April 2025

TITLE: Wastewater Treatment Plant - Nature Calls; Quarterly Update and Submission to Taumata Arowai on Draft Standards

PRESENTED BY: Mike Monaghan - Manager 3 Waters

APPROVED BY: Chris Dyhrberg, General Manager Infrastructure

RECOMMENDATION(S) TO SUSTAINABILITY COMMITTEE

1. That the Committee receive the report titled 'Wastewater Treatment Plant – Nature Calls; Quarterly Update' presented to the Sustainability Committee on 16 April 2025.
2. That the Committee note the matters to be included in the submission on the Draft National Wastewater Standards.

1. ISSUE

- 1.1 The Nature Calls Project Team completed the concept design and development of the resource consent application to Horizons Regional Council (Horizons) in late 2022. This was the culmination of four years of work developing the Best Practicable Option (BPO), which comprises highly treated wastewater being discharged to the Manawatū River or to land.
- 1.2 Quarterly updates for the project were requested by Council. This report provides an update on the project for the period from December to April 2025.

2. SUMMARY

- 2.1 The Project Team have reviewed the Draft Wastewater Standards ('draft standards') released by Taumata Arowai in February 2025 and have assessed these in relation to the Nature Calls Projects.
- 2.2 A submission on the draft standards is being prepared to be submitted to Taumata Arowai by 24 April 2025 (Attachment 1).
- 2.3 The project team met with Horizons this quarter to discuss future options for the disposal of biosolids.

3. BEST PRACTICABLE OPTION (BPO) UPDATE

Submission to Taumata Arowai on Draft Standards

- 3.1 The draft standards were released on 26 February 2025. Submissions on the draft standards are due 24 April 2025 to Taumata Arowai (TA).
- 3.2 Given the significance of the Draft Wastewater Standards, the draft submission has been presented to this Committee for consideration. The draft submission is included as Attachment 1. Due to timing, the final submission will be approved by the Chief Executive, taking into account any feedback received.
- 3.3 A summary of the key matters that the submission will focus on, and the initial response, is outlined below (note that TA has requested feedback around key questions).
- 3.4 *Agreement with the first set of draft standards*
Overall, it is recommended to support the draft standards as they provide a clear and consistent approach to provide regulatory certainty, allowing Council to plan for future infrastructure investments. However, the draft standards currently do not provide for:
 - A streamlined consenting pathway – the project team encourage TA to consider providing a clearer framework (particularly in the Nature Calls situation when considering discharge to water in hard-bottomed rivers); or
 - A proactive approach to consider future wastewater technology for managing emerging organic contaminants and other pollutants.
- 3.5 *How factors such as climate change, population growth, or consumer complaints be addressed when considering a 35-year consent term*
 - Council suggests an adaptive management approach could be considered that allows for periodic reviews and adjustments of wastewater management practices over time. This approach would:
 - Encourage integration of emerging technologies and evolving community expectations into long-term planning; and
 - Ensure infrastructure investments remain viable and effective considering climate change and population growth.
 - Customer complaints and public health concerns should be considered as key indicators for reviewing system performance and a structured feedback mechanism would allow councils to address issues proactively.

3.6 *Discharge to water standards*

Overall, Council supports the strategy of defining sensitive receiving environments and setting appropriate discharge standards for them. Council is comfortable in the main with the thresholds suggested, but there are concerns with the lack of any thresholds for open ocean discharges. Further, we seek clarifications for the following:

- Flow monitoring measurements;
- How the standard would apply when considering dual discharge seasonally (i.e. discharge to water in high flows (winter) and to land in low flows (summer));
- The lack of identifying a consenting activity status for discharges to land and water;
- How discharges to land and water would be managed (i.e dual discharges) and the regulator retaining discretion for both discharges under the proposed standards; and
- How compliance with the wastewater standards will be integrated with the 'other' matters and will be managed by the regulator (e.g. emerging contaminants).

3.7 *Managing periphyton*

Council understands the consideration given to hard-bottomed rivers in the draft standards, however, the submission seeks clarification on the following:

- The periphyton risk assessment – guidance from TA is requested to provide a consistent approach to be used and how the regulator could assess this;
- How the risk assessment for periphyton integrates with the proposed amendments to the Resource Management Act (RMA) noting that the regulator cannot grant a resource consent for discharges that do not meet the standards; and
- Clarity on how this approach could be considered annually to consider seasonal variability.

3.8 *Discharge to land standards*

Overall, Council supports the consideration of discharge to land standards. However, there is very little information available to support this standard as currently drafted. Additional clarity is required on the following matters:

- The risk assessment approach proposed for land discharge – guidance from TA is requested to provide a consistent approach to be used and how the regulator could assess this;

- The lack of identifying a consenting activity status for discharges to land and water;
- How discharges to land and water would be managed (i.e dual discharges) and the regulator retaining discretion for both discharges under the proposed standards;
- How the risk assessment for land discharge integrates with the proposed amendments to the Resource Management Act (RMA) noting that the regulator cannot grant a resource consent for discharges that do not meet the standards; and
- How compliance with the wastewater standards will be integrated with the 'other' matters and will be managed by the regulator (e.g. emerging contaminants).

3.9 *Biosolids grading system best practice and barrier to implement*

Overall, Council recognises the biosolids standards have been in production for a number of years and supports the consideration and approach to biosolids in the proposed standards. However, additional clarity is required on:

- The definition of biosolids vs compost; and
- When a biosolid is no longer considered a biosolid.

3.10 *Whether the proposed monitoring and reporting requirements for overflows are sufficient*

Overall, Council supports the risk-based approach to managing overflows and the proposal for all overflows (that meet the criteria) as a controlled activity. Council does request that TA specifies the matters that the regulator will retain control over and consequently impose conditions on.

3.11 *Implementation and Compliance*

There are no matters recommended to submit on relating to implementation and compliance.

4. **HORIZONS REGIONAL COUNCIL**

4.1 The project team met with Horizons Regional Council to discuss the use of biosolids at Awapuni southern slopes on 27 February 2025. It was agreed that the application of composted biosolids on the Awapuni southern slopes is within the current consent.

4.2 A quarterly update was provided to Horizons on 21 March 2025.

5. IWI INVOLVEMENT

- 5.1 Regular meetings continue with representatives from Rangitāne, Te Tūmatakahuki and Ngāti Whakātere. The focus has been on understanding the draft standard release and the general progress of the project.

6. BIOSOLIDS STRATEGY UPDATE

- 6.1 The project team has met with Horizons and confirmed that the southern slope can be used within the current consent. Work is being prepared to design and scope the construction required on the slope to allow safe and compliant disposal of composted biosolids.

7. ORGANISATIONAL STRUCTURE

- 7.1 Work has continued to set up technical services independent from the delivery team to support the Project Oversight Committee. The independent advice will be used to provide assurance of project strategy and delivery as required.

8. RISK

- 8.1 The following top risks have been identified and are being actively managed by the project team.

Risk	Risk Level	Mitigations	Residual Risk
Long-Term Plan budget The project may fail to secure funding or be unable to proceed due to exceeding the Long-Term Plan FY24-34 budget allocation.	VERY HIGH	<ul style="list-style-type: none"> Introduce fatal flaw screening on estimated option cost. Adjustment of weighting of BPO selection considered with input from EMs. 	HIGH
Ratepayer affordability The project may face public opposition, delays, or inability to proceed due to ratepayers being unable to afford the proposed scheme. This could lead to reputational damage for the Council.	VERY HIGH	<ul style="list-style-type: none"> Council has set Long-Term Plan budget cap, with instructions to reduce further if possible. BPO process introduced fatal flaw screen based on budget and BPO selection weightings to be adjusted. 	HIGH

Risk	Risk Level	Mitigations	Residual Risk
National Wastewater Standards Additional cost and time incurred due to standards release. Standards could affect how the project can be consented and require high levels of rework to options.	HIGH	<ul style="list-style-type: none"> Rework programme timeline and accept time delays, continuing with no regrets works only. Analyse impact of draft standard. 	HIGH
Iwi relationships The project risks damaging relationships with Iwi and breaching obligations under the Treaty of Waitangi, potentially leading to reputational harm and project disruptions.	HIGH	<ul style="list-style-type: none"> Iwi represented on Project Oversight Committee. Iwi involvement and consultation in operational project activities to be determined by Council and Iwi agreement. 	HIGH
Programme Delays Additional costs (overhead and project management) may be incurred due to schedule slippages. Some slippages are outside the control of the project team.	HIGH	<ul style="list-style-type: none"> Planning possible programme scenarios. Conversations with governance about available slots this year. Booked in relevant Council Meetings. 	MEDIUM

9. BUDGET

- 9.1 At the end of February 2025, a total of \$571,706 has been spent YTD from the revised \$1.82M Nature Calls budget for 2024/25.
- 9.2 Prior to the Long-Term Plan 24-34 budget set in June 2024 the project has spent \$11.7M which includes \$5.8M of operational costs and \$5.9M of capital costs incurred between FY17/18 and FY23/24

10. COMPLIANCE AND ADMINISTRATION

Does the Committee have delegated authority to decide?	Yes
Are the decisions significant?	Yes
If they are significant do they affect land or a body of water?	Yes
Can this decision only be made through a 10 Year Plan?	No
Does this decision require consultation through the Special Consultative procedure?	No
Is there funding in the current Annual Plan for these objectives?	Yes
Are the recommendations inconsistent with any of Council's policies or plans?	No
The recommendations contribute to: Whāinga 4: He tāone toitū, he tāone manawaroa Goal 4: A sustainable and resilient city	
The recommendations contribute to this plan: 13. Mahere wai 13. Water Plan The objective is: Lodge resource consent application for future discharge of Wastewater Treatment Plant.	
Contribution to strategic direction and to social, economic, environmental and cultural well-being	Lodging for resource consent allows Council to continue to provide its wastewater services and allows for future proofing the city.

ATTACHMENTS

- Palmerston North City Council Draft Response to Wastewater Standards [↓](#) 

Palmerston North City Council Submission on the Draft National Wastewater Environmental Performance Standards

1. Introduction

Palmerston North City Council (PNCC) welcomes the opportunity to provide feedback on the Proposed National Wastewater Environmental Performance Standards as outlined by Taumata Arowai (TA). PNCC supports the objective of creating a consistent regulatory framework that enhances environmental outcomes while ensuring practical and cost-effective compliance measures for territorial authorities.

Wastewater management is a crucial aspect of sustainable urban planning and environmental protection. Given the aging state of infrastructure across New Zealand, the number of consents expired or about to expire, and increasing population pressures, it is vital to establish regulatory guidelines that promote efficiency, affordability, and resilience. PNCC is committed to ensuring that the national wastewater standards align with the long-term sustainability goals of local governments, strengthen our relationships with Iwi and hapū while addressing the needs of both current and future generations.

2. Scope of the Proposed Wastewater Standards

Consultation Question: Do you agree with the areas the first set of standards are proposed to cover? What areas should be prioritised in future?

PNCC Response:

PNCC agrees with the areas that the draft standards propose to cover, particularly in relation to discharges to water and land. These two aspects are fundamental to ensuring that wastewater management aligns with environmental sustainability goals while maintaining practical and achievable compliance measures for local authorities. Establishing clear and consistent standards for these discharges will provide much-needed regulatory certainty, enabling councils to plan infrastructure investments efficiently and make informed decisions on treatment plant upgrades, operational expectations and maintenance requirements to meet the discharge standards.

However, PNCC requests that TA provides the following –

- A streamlined consenting pathway –PNCC encourage TA to consider providing a clearer framework for discharge to water (particularly regarding the wastewater discharge situation PNCC face regarding discharge to water in hard-bottomed rivers)
- A proactive approach to account for the future introduction of wastewater technology necessary for managing emerging organic contaminants and other pollutants.

These points are addressed in further detail below.

Streamlined Consenting Pathway

PNCC wishes to highlight the importance of an efficient consenting process. Given the complexity of the current Resource Management Act (RMA) process and the substantial number of wastewater treatment plants requiring re consenting in the coming decade, it is critical that the new standards streamline the process rather than introduce further delays. A clear and well-defined framework is necessary to ensure that territorial authorities and water service organisations can navigate the consenting process with confidence, reducing administrative burdens and preventing unnecessary bottlenecks that could hinder progress in efficiently upgrading and maintaining wastewater infrastructure.

A Proactive Approach to Managing Emerging Technology

PNCC encourages TA to consider future developments in wastewater treatment, particularly regarding emerging organic contaminants and other constituents of concern, such as endocrine disruptors, pharmaceuticals, and microplastics. These pollutants are increasingly recognised as having potential environmental and human health impacts, and national standards should evolve to address them as scientific understanding and treatment technologies advance. A proactive approach to these contaminants will help ensure New Zealand remains at the forefront of sustainable wastewater management and environmental protection.

New Zealand's wastewater infrastructure is aging, and a significant proportion will require renewal over the next decade. The proposed standards aim to provide regulatory certainty, streamline consenting processes, and improve network performance reporting.

Wastewater infrastructure investments require long-term planning, as they involve significant capital and operational expenditures. It is important that these standards allow for adaptability to new technologies and innovations in wastewater treatment. Additionally, factors such as environmental sustainability, resource efficiency, and climate resilience must be considered when designing and implementing these national standards.

3. Environmental and Infrastructure Context

Consultation Question: How should factors such as climate change, population growth, or consumer complaints be addressed when considering a 35-year consent term?

PNCC Response:

Overall, PNCC suggests that these matters could be considered by -

- Incorporating an adaptive management approach that allows for periodic reviews and adjustments of wastewater management practices over time. This approach would –
 - Encourage integration of emerging technologies and evolving community expectations into long-term planning

- Ensure infrastructure investments remain viable and effective by accounting for climate change and population growth
- Customer complaints and public health concerns are key indicators for reviewing system performance and a structured feedback mechanism would allow Councils to address issues proactively

These matters are outlined in more detail below.

Adaptive Management Approach

PNCC recognises that climate change, population growth, Iwi partner expectations and consumer concerns are evolving challenges that require a flexible and adaptive management approach. The 35-year consent term presents an opportunity to incorporate continuous improvement initiatives that ensure wastewater infrastructure remains resilient and responsive to long-term environmental and societal changes.

PNCC advocates for an adaptive management approach that allows for periodic review and adjustment of wastewater management practices over time. This would encourage water service providers to integrate emerging technologies, new scientific findings, and evolving community and cultural expectations into their long-term planning and operational strategies. By embedding review mechanisms within the consent framework, wastewater treatment plants can progressively enhance their environmental performance without being focused on a 35-year horizon. This would also help to address the current approach evident in wastewater discharge consenting of major “step changes” every second generation or so.

Climate change is expected to bring increased rainfall variability, rising sea levels, and higher temperatures, all of which could significantly impact wastewater treatment efficiency and discharge quality. Similarly, population growth—particularly in urban areas—will place additional demands on existing infrastructure, necessitating scalable and future-proofed solutions. An adaptive management framework would ensure that infrastructure investments remain viable and effective despite these uncertainties.

Consumer Complaints

Consumer complaints and public health concerns should be considered as key indicators for reviewing system performance. A structured feedback mechanism would allow councils to address issues proactively, improving transparency and public trust in wastewater management decisions.

Summary

Overall, PNCC supports the concept of long-term consents but stresses the importance of incorporating adaptive management principles to ensure that wastewater treatment systems remain effective, compliant, and aligned with best practices over time. We encourage TA to develop guidance on how periodic assessments and technological upgrades can be

seamlessly integrated into the regulatory framework to promote resilience and sustainability and remove the shock factor of an upgrade every 35 years.

4. Discharge to Water Standards

The draft proposes a tiered approach based on the receiving environment's sensitivity, with varying treatment requirements for lakes, rivers, estuaries, and coastal waters. The framework also introduces enhanced monitoring and reporting obligations.

It is essential that the standards provide clear guidelines on acceptable limits of contaminants and the expected treatment processes required. This will help ensure that discharges into sensitive aquatic environments do not cause significant ecological or public health concerns. The tiered approach is an effective way to balance the need for high water quality while considering the economic feasibility of wastewater treatment plants across different locations.

Consultation Question: Are the treatment limits, and monitoring and reporting requirements proportionate to the potential impacts of the different discharge scenarios?

What benefits and challenges do you anticipate in implementing the proposed approach? Are there particular matters that could be addressed through guidance material?

PNCC's feedback in relation to this question is provided in relation to the following matters:

- Use of 7day MALF to calculate dilution ratio
- How the standard would apply when considering dual discharge seasonally (i.e. discharge to water in high flows (winter) and to land in low flows (summer))
- The lack of identifying a consenting activity status for discharges to land and water
- How discharges to land and water would be managed (i.e. dual discharges) and the regulator retaining discretion for both discharges under the proposed standards
- How compliance with the wastewater standards will be integrated with the 'other' matters being managed by the regulator (e.g. emerging contaminants).

These are outlined in more detail below.

The use of 7day MALF

It is not clear from the consultation document whether the 7-day MALF figure used for calculating the dilution ratio that applies to a discharge is a fixed figure at a particular point in time or could vary across the term of a consent. As TA will be aware a 7 day MALF is calculated on a continuous flow record. Depending on both long term and seasonal changes over the term of a consent the 7-day MALF may change and could foreseeably alter the

dilution ratio for a discharge. Additional clarity in the final wastewater standards would help ensure consent applicants know upfront the standards they must meet.

In addition, as the consultation document notes, a number of wastewater discharges around New Zealand take advantage of higher flows at times of the year to discharge to water, where effects on water quality may not be as adverse as during times of low flow. It is conceivable that a wastewater treatment plant operator would also change treatment applied to wastewater to reduce OPEX at times of higher flow when less high-quality treated wastewater may be able to be discharged. As currently drafted, the standards appear to suggest that neither of these situations will be possible, with the wastewater standard that applies being set on the basis of low flows and on the assumption that that quality needs to be met year round, even when river flows are higher.

PNCC requests that TA reconsider this approach and identify standards that could apply at different river flows during a year, to enable flexibility for wastewater treatment operators while still maintaining consistent environmental protection.

Lack of activity status for consenting discharges

Unlike the draft standards for biosolids and overflows and bypasses, the consultation document does not identify an activity status for discharges of wastewater to water or to land. This has the effect of leaving the regulator with potentially wide ranging discretion in processing consent applications. The activity status of a discharge will be determined by the rules in the relevant regional plan. The activity status in plans is mainly discretionary or non-complying. Relying on plan classifications has the potential to result in disputes and runs the risk of other plan provisions being applied to the consent process. This may work against the stated desire for a more efficient and streamlined consenting process, depending on the activity status contained in existing regional plans.

Regulator Discretion for Assessing Dual Discharges

It is not clear from the consultation document how compliance with the wastewater standards would be integrated with the other matters that have been left with the regulator to determine. Clarity in relation to this would assist consent applicants and regulators.

There needs to be a “one stop shop” for the consenting of wastewater discharges. This could best be achieved by the standards classifying wastewater discharges to water as controlled activities and clearly setting out the specific matters over which the consent authority retains control and therefore the ability to impose conditions. For example, the matters of control could relate to monitoring and reporting, standards for TN and TP for discharges to hard bottom rivers. A controlled activity status means that discharges that meet the standards cannot be declined.

Dual discharge points

PNCC is in a situation where the river to which treated wastewater is currently discharged has, within a relatively short distance, both hard and soft bed material. In these situations, a potential option is to discharge at two locations, to manage potential adverse effects. Clear guidance on which wastewater standards apply, when, and where should be included in the final wastewater standards

Matters not covered by the standards

The consultation document notes that a series of matters are not intended to be covered by the first wastewater standards, including volume of the discharge, cumulative effects, toxicity of metals, and the presence of artificial contaminants. While the consultation document notes that the regulator will retain discretion over these matters, it is not clear how this will occur. This has the risk of creating additional complexity for applicants and could result in the perverse outcome of a discharge being partially consented i.e. the contaminants subject to the standard consented and the contaminants/ matters not covered by the standard declined. It would be useful for how regulators are to deal with these effects to be clearly stated in the final wastewater standards in order to provide an efficient consent process that has only the level of complexity required to manage environmental effects.

How Compliance with the wastewater standards will be integrated with the 'other' matters being managed by the regulator

The technical document which supports the consultation document also notes that a number of the contaminants specified in the wastewater standards will act to control contaminants that are not specified in the standard. The Technical Advice refers to this as a “co-regulation” approach to the management of these “other” contaminants which appears to assume that compliance with the contaminants subject to the Standard will result in sufficient regulation of the other contaminants that can comprise wastewater discharges. This approach is supported and would remove the risk of the perverse outcome of only parts of a discharge being consented as discussed above. This approach could be a short term measure until TA produces standards for these “other” contaminants.

PNCC recommends explicitly identifying in the wastewater standards which “other” contaminants are to be addressed through the control of listed contaminants, ensuring the regulator cannot impose additional standards.

Consultation Question: What feedback do you have for managing periphyton in hard bottomed or rocky streams or rivers?

What detail should be covered in guidance to support implementing this approach for managing periphyton?

PNCC's feedback in relation to this question is provided in relation to the following matters:

- The periphyton risk assessment – guidance from TA is requested to provide a consistent approach to be used and how the regulator could assess this
- How the risk assessment for periphyton integrates with the proposed amendments to the Resource Management Act (RMA) that the regulator cannot grant a resource consent for discharges that do not meet the standards
- Clarity on how this approach could be considered annually to consider seasonal variability

Site-Specific Risk Assessment

The site-specific risk assessment required to determine total nitrogen and total phosphorus standards for discharges to hard-bottom rivers and streams potentially poses large risks to wastewater treatment operators where, even with the highest possible levels of treatment, it is not possible to avoid the risk of periphyton accumulation.

PNCC requests that TA provide guidance on how this risk-based approach is carried out to provide a clear framework for councils to follow. It would also be useful to understand whether historic data could be used when undertaking any risk assessments, particularly if council's have progressed consent documentation for new discharge consents already.

Guidance is also requested on how the regulator will assess these risk-based assessments. It is unclear from the draft standards how the current policy framework from existing regulatory documents would be interpreted by the regulator.

RMA Amendments

The periphyton risk-based approach appears to conflict with the requirement we understand will be inserted into the Resource Management Act 1991 that regional councils will not be able to grant resource consents for discharges that do not meet wastewater standards. In the case where a standard is not specified (for example, where a site-specific risk assessment is required to set the standard) it is not clear how the link between that and the requirements of the Resource Management Act 1991 will be managed. Clarity in the final wastewater standards in relation to this is essential.

Seasonal Variability

Additional clarity is also requested regarding the potential for nutrient levels to fluctuate seasonally based on the risk to periphyton growth.

5. Discharge to Land Standards

The standards introduce a site-specific risk assessment framework to determine suitable land discharge locations and necessary treatment measures.

Land application of treated wastewater can provide significant benefits in terms of nutrient recovery and soil moisture enhancement. However, it is necessary to ensure that these discharges do not lead to long-term soil degradation or groundwater contamination. PNCC

supports the implementation of robust monitoring requirements to ensure that land-based discharge practices are environmentally responsible and sustainable.

Consultation Question: Are the proposed methods for assessing land application risks appropriate? Should additional safeguards be considered?

PNCC's feedback in relation to this matter include the following matters:

- The risk assessment approach proposed for land discharge – guidance from TA is requested to provide a consistent approach to be used and how the regulator could assess this
- The lack of identifying a consenting activity status for discharges to land and water
- How discharges to land and water would be managed (i.e. dual discharges) and the regulator retaining discretion for both discharges under the proposed standards
- How the risk assessment for land discharge integrates with the proposed amendments to the Resource Management Act (RMA) that the regulator cannot grant a resource consent for discharges that do not meet the standards

Risk Assessment Proposed for Land Discharge

It is difficult to provide feedback on this approach as currently drafted due to the limited information available. PNCC request the opportunity to input into how the land application risk assessment would be applied once further information is available and prior to the final standards being decided.

PNCC requests guidance on how this risk-based approach will be implemented to establish a clear framework for councils.

In the information provided in the draft standards example criteria are provided (in Appendix Four of the consultation document) for assessing site capability for discharges of treated wastewater to land. One of the listed criteria is 'natural hazards', which makes reference to flooding. From the example criteria provided to date it is not clear what reference to 'very high' natural hazard risks and flood prone land means. PNCC suggests that TA clarify this. In addition, PNCC requests that TA considers what the implications of flood prone land are for mixed discharge systems, where discharge to land in summer is being proposed. It is not clear whether flood prone land would be a risk during summer discharges and therefore would need to be avoided.

Guidance is also required on how the regulator will assess these risk-based assessments. It is unclear from the draft standards how the current policy framework from existing regulatory documents would be interpreted by the regulator.

Lack of activity status for consenting discharges

Unlike the draft standards for biosolids and overflows and bypasses, the consultation document does not identify an activity status for discharges of wastewater to land and to

water. This has the effect of leaving the regulator with potentially wide ranging discretion in processing consent applications. The activity status of a discharge will be determined by the rules in the relevant regional plan. The activity status in plans is mainly discretionary or non-complying. Relying on plan classifications has the potential to result in disputes and runs the risk of other plan provisions being applied to the consent process. This may work against the stated desire for a more efficient and streamlined consenting process, depending on the activity status contained in existing regional plans.

Regulator Discretion for Assessing Dual Discharges

It is not clear from the consultation document how compliance with the wastewater standards would be integrated with the other matters that have been left with the regulator to determine. Clarity in relation to this would assist consent applicants and regulators.

There needs to be a “one stop shop” for the consenting of wastewater discharges. This could best be achieved by the standards classifying wastewater discharges to water as controlled activities and clearly setting out the specific matters over which the consent authority retains control and therefore the ability to impose conditions. A controlled activity status means that discharges that meet the standards cannot be declined.

RMA Amendments

The land discharge risk-based approach appears to conflict with the requirement we understand will be inserted into the Resource Management Act 1991 that regional councils will not be able to grant resource consents for discharges that do not meet wastewater standards. In the case where a standard is not specified (for example, where a site-specific risk assessment is required to set the standard) it is not clear how the link between that and the requirements of the Resource Management Act 1991 will be managed. Clarity in the final wastewater standards in relation to this would be useful.

6. Beneficial Reuse of Biosolids

A grading system for biosolids is proposed, determining their permitted use based on quality and treatment levels.

Biosolids can serve as valuable soil amendments and contribute to the circular economy by returning nutrients to agricultural and forestry land. It is critical that the standards ensure that only safe and well-treated biosolids are applied to land, reducing potential health and environmental risks and meets our Iwi partners requirements. PNCC encourages further research and innovation in biosolid treatment technologies to improve the quality and usability of these materials.

Consultation Question: Does the proposed biosolids grading system align with best practice? Are there any barriers to its implementation?

Overall, PNCC supports the consideration and approach to biosolids in the proposed standards. However, additional clarity is required on –

- The definition of biosolids vs compost
- When a biosolid is no longer considered a biosolid.

7. Management of Overflows and Bypasses

The draft standard mandates risk-based planning and monitoring for wastewater overflows, requiring all existing overflow points to be consented.

Uncontrolled overflows can pose severe environmental and public health risks, particularly in urban areas where stormwater and wastewater networks are closely linked. The introduction of proactive monitoring and early warning systems will help mitigate risks associated with overflows. PNCC supports a strategic approach that prioritises infrastructure resilience, including investment in improved capacity and emergency response measures. This, however, needs to be managed and prioritised against other more pressing infrastructure investments that will be identified by the implementation of the wastewater environmental performance standards.

Consultation Question: Are the proposed monitoring and reporting requirements for overflows sufficient? Should additional controls be included?

For the management of wastewater network overflows and bypasses, PNCC supports TA's risk based approach to give network operators the tools to prioritise addressing overflows and bypasses based on the risk, impact and likelihood of overflows, within their means. The risk based approach must recognise that reducing the risk requires a long term approach due to the ability to identify, plan and fund the works required and mitigate the effects of climate change.

PNCC supports TA's proposal to make all overflows from wastewater networks, together with bypasses from a wastewater plant, a controlled activity as part of the wastewater standard. The standard will also need to clearly set out the specific matters over which the consent authority retains control and therefore the ability to impose conditions. Given the long term approach that is required to reduce the risk of these types of discharges, the standard should specify that the term of these consents will be 35 years.

8. Implementation and Compliance

Regional councils will remain responsible for enforcement, with the proposed standards incorporated into resource consents. The document suggests that standardised infrastructure solutions could be developed to assist smaller communities.

Effective implementation of wastewater standards requires adequate resources, training, and enforcement mechanisms. PNCC supports an approach that fosters collaboration between local authorities, industry professionals, and regulatory bodies to ensure efficient utilisation of resources and seamless compliance. Clear guidance, templates, and further case studies will be valuable in helping councils navigate the implementation process.

Consultation Question: What challenges do you foresee in implementing the proposed wastewater standards? Are additional resources or guidance required?

PNCC have no comments in relation to implementation other than those outlined specifically in previous questions.

9. Conclusion

Overall, Palmerston North City Council supports the introduction of these wastewater standards and looks forward to working collaboratively with TA and other stakeholders to refine and implement them in a way that balances environmental outcomes with practical implementation for local authorities.

PNCC is generally supportive of national wastewater standards that provide consistency and regulatory certainty. We acknowledge the need for further refinement in specific areas and look forward to working with TA to ensure the standards are practical and beneficial for all stakeholders.

Future iterations of the standards should consider technological advancements, population growth trends, relationships with Iwi, and emerging contaminants. By maintaining a continuous review process, New Zealand can ensure its wastewater infrastructure remains resilient, sustainable, and aligned with global best practices.

COMMITTEE WORK SCHEDULE

TO: Sustainability Committee

MEETING DATE: 16 April 2025

TITLE: Committee Work Schedule

RECOMMENDATION TO SUSTAINABILITY COMMITTEE

1. That the Sustainability Committee receive its Work Schedule dated April 2025.

SUSTAINABILITY COMMITTEE WORK SCHEDULE – APRIL 2025

Estimated Report Date	Subject	Officer Responsible	Current Position	Date of Instruction & Clause number
16 April 2025	Annual Sector Lead Report: Environment Network Manawātū	General Manager Customer & Community	Deferred to allow for adequate data collection	Terms of Reference
16 April 2025	Local Water Done Well – hearings	General Manager Infrastructure		Terms of Reference
	Local Water Done Well – deliberations	General Manager Infrastructure	Council 7 May	
16 April 2025 18 June 2025	Wastewater Treatment Plant - Nature Calls: Quarterly Report	General Manager Infrastructure		Council 29 May 2024 Clause 95.11 - 25 (rec 2)
As required	Manawātū-Whanganui Climate Joint Action Committee Update	General Manager Strategic Planning	Subject to agenda of Joint Committee or any changes at a national level	Climate change plan ongoing

18 June 2025	Draft community-focused city-wide climate action plan	General Manager Strategic Planning		Climate change plan ongoing action #5 16 October 2024 Clause 34-24
18 June 2025	Resource Recovery Services Review	General Manager Infrastructure		21 August 2024 Clause 28-24
	PNCC Organisational Emissions Inventory 2024/25 Annual Report	General Manager Strategic Planning	Council 8 October	Climate change plan ongoing action #1
	Waste management and minimisation plan 2019 - annual progress update for 2024/25 FY	General Manager Infrastructure	Council 8 October	9 Sept 2020 Clause 17-20
	Citywide Emissions Inventory 2024 Annual Report	General Manager Strategic Planning	Council 8 October	Climate change plan ongoing action #3
	Low Carbon Fund Allocations 2024/25	General Manager Strategic Planning	Council 8 October	21 August 2024 Clause 24-24
2025	Options to enable inclusion of organisational and community-wide sustainability indicators in the 2026 Sustainability Review	General Manager Strategic Planning/ General Manager Customer & Community		22 May 2024 Clause 15
2025	Progress report on the city-wide stormwater strategy	General Manager Strategic Planning		16 October 2024 Clause 42-24

TBC 2026	Develop a city-wide stormwater strategy	General Manager Strategic Planning	Prior to the development of 2027 FDS	Council 29 May 2024 Clause 95.7 -24 2F(3)
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