

Rārangi Take Kauhihera
Whanokē

Extraordinary Council Agenda

To hear submissions on the Trade Waste Bylaw

Monday 13 May 2024 at 2 pm
Council Chamber, Albion Street, Hāwera



Ngā Mema o te Komiti / Committee Members



Phil Nixon
Mayor



Andy Beccard
Councillor



Mark Bellringer
Councillor



Celine Filbee
Councillor



Te Aroha Hohaia
Councillor



Robert Northcott
Deputy Mayor



Leanne Horo
Councillor



Aarun Langton
Councillor



Steffy Mackay
Councillor



Tuteri Rangihaeata
Councillor



Diana Reid
Councillor



Bryan Roach
Councillor



Brian Rook
Councillor



Racquel Cleaver-Pittams
Councillor



Heather Brokenshire
*Community Board
 Representative*



Karen Cave
*Community Board
 Representative*



Jacq Dwyer
*Community Board
 Representative*



Monica Willson
*Community Board
 Representative*

Apatono / Delegations

The primary role of the Policy and Strategy Committee is to allow free and open debate whilst policies are being developed. The membership of the Committee is made up of all Councillors. The Council invites one representative from each Community Board to attend the meetings where they have speaking rights only.

Policy is usually initially developed within the portfolio groups. It is then passed to the Policy and Strategy Committee who will discuss the policies and make recommendations for additions or amendments. Once the Policy and Strategy Committee is happy with the policies the policy is taken to the Full Council meeting for adoption.

Huinga Tāngata / Attendance Register

Date	25/10/22	08/02/23	20/03/23	01/05/23	12/06/23	24/07/23	04/09/23	16/10/23	27/11/23	07/02/24	18/03/24
Meeting	O	O	O	O	O	O	O	O	O	O	O
Andy Beccard	✓	✓	✓	✓	✓	✓	✓	✓	✓	A	✓
Mark Bellringer	✓	✓	✓	✓	✓	✓	A	✓	✓	✓	A
Celine Filbee	✓	X	✓	✓	A	✓	✓	✓	A	✓	✓
Te Aroha Hohaia	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Leanne Horo	X	✓	✓	✓	✓	✓	✓	A	✓	A	✓
Aarun Langton	✓	✓	✓	✓	✓	✓	✓	✓	A	A	✓
Steffy Mackay	✓	✓	✓	✓	✓	✓	✓	✓	A	✓	✓
Phil Nixon	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Robert Northcott	✓	✓	✓	✓	✓	✓	✓	A	✓	✓	✓
Tuteri Rangihaeata	A	✓	A	✓	✓	✓	✓	A	✓	A	✓
Diana Reid	✓	✓	✓	✓	A	✓	✓	✓	✓	✓	✓
Bryan Roach	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Brian Rook	✓	✓	A	✓	A	✓	✓	✓	✓	A	✓
Racquel Cleaver-Pittams	-	-	✓	✓	✓	✓	✓	✓	✓	✓	✓
Heather Brokenshire		✓	✓	A	✓	A	✓	✓	✓	✓	✓
Karen Cave		✓	✓	A	✓	✓	✓	✓	A	✓	✓
Jacq Dwyer		✓	A	A	✓	✓	A	✓	✓	✓	✓
Monica Willson		✓	A	A	X	✓	✓	✓	✓	A	✓

Key

- ✓ Attended
- AO Attended Online
- Was not required to attend
- A Apology
- Y Attended but didn't have to attend
- X Did not attend - no apology given

Types of Meetings

- O Ordinary Council Meeting

He Pānga Whakararu / Conflicts of Interest

Members are reminded of the need to be vigilant to stand aside from decision making when a conflict arises between their role as an elected member and any private or other external interest they might have.

He Karere Haumarū / Health and Safety Message

In the event of an emergency, please follow the instructions of Council staff.
If there is an earthquake – drop, cover and hold where possible. Please remain where you are until further instruction is given.



Rārangi Agenda

Extraordinary Council To hear submissions on the Trade Waste Bylaw Monday 13 May 2024 at 2 pm

1. **Karakia**
2. **Matakore / Apologies**
3. **Tauākī Whakarika / Declarations of Interest**
4. **Submissions**

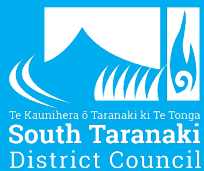
Speaking

- | | | |
|-----|---|---------|
| 4.1 | Rana, Dinesh | Page 12 |
| 4.2 | Conley, Peter (ANZCO Foods) | Page 45 |

Non Speaking

- | | | |
|-----|---|---------|
| 4.3 | Olckers, Philip (Hāwera Hospital and Dental) | Page 8 |
| 4.4 | Houghton, Robin (Houghtons Plumbing, Heating and Gas) | Page 15 |
| 4.5 | Duthie, Kevin (Eltham Presbyterian Campsite) | Page 21 |
| 4.6 | Johnson, Tim (All Things Automotive) | Page 25 |
| 4.7 | Tai, KenFee | Page 30 |
| 4.8 | Jeffries, Laura (Fonterra Limited) | Page 36 |

5. **Karakia**



Karakia

1. Karakia

Ruruku Timata – Opening Prayer

(Kia ururu mai ā-hauora,
ā-haukaha, ā-hau māia)

Ki runga

Ki raro

Ki roto

Ki waho

Rire rire hau

Paimārire

*(Fill me with vitality)
strength and bravery)*

Above

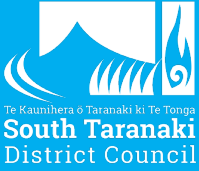
Below

Inwards

Outwards

The winds blow & bind us

Peace be with us.



Matakore Apologies

2. Matakore / Apologies

Leave of Absence: *The Board may grant a member leave of absence following an application from that member. Leave of absences will be held in the Public Excluded section of the meeting.*



Ngā Whakaputanga

Declarations of Interest

3

3. Tauākī Whakarika / Declarations of Interest

Notification from elected members of:

- a) Any interests that may create a conflict with their role as an elected member relating to the items of business for this meeting; and
- b) Any interests in items in which they have a direct or indirect pecuniary interest as provided for in the Local Authorities (Members' Interests) Act 1968.

Declarations of Interest: Notification from elected members of: Any interests that may create a conflict with their role as an elected member relating to the items of business for this meeting; and Any interests in items in which they have a direct or indirect pecuniary interest as provided for in the Local Authorities (Members' Interests) Act 1968

Submitter Details

Submission Date: 20/03/2024
 First name: Philip Last name: Olckers
 Organisation: Hawera Hospital and Dental Clinic
 Preferred method of contact Email

Postal address: [REDACTED]
 Suburb:
 City: [REDACTED]
 Country: NZ
 Postcode: 4340

Email: [REDACTED]

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

- Would you like to present your submission in person at a hearing?
- Yes
 - I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

1) Category Types

The Trade Waste Bylaw has been developed around a classification system that places a business’s discharge into one of four categories – permitted, controlled, conditional or prohibited.

<p>Option 1a Council's preferred option</p>	<p>Retain the status quo – the current category types</p> <p>The current categories provide clear definitions of what types of trade waste are permitted, what types require monitoring or sampling (controlled) and what types fall into a higher level of trade waste disposal that requires more treatment (conditional). The Bylaw also provides clear guidelines on what is prohibited trade waste that has the potential to cause damage to the environment or the wastewater system. This classification system gives the Council a method to better identify risk to the wastewater network and provide equity in apportioning costs.</p>
<p>Option 1b</p>	<p>No category system</p> <p>This would make it difficult to achieve a fair system because discharges from different premises would be averaged and costs charged uniformly to all ratepayers. This would mean residential and many commercial ratepayers would be subsidising businesses that discharge trade wastes. We currently have separate Trade Waste Agreements with five of</p>

the six major wet industries connected to our network.

Options to consider - Category Types

Option 1a - Introduce proposed category types

2) Annual Licensing Fee - for Controlled and Conditional Categories only

To ensure a fair and consistent approach, the current Bylaw includes a licensing system where premises pay an annual licence fee based on the types of discharges they make into the wastewater system. The fee is \$162.00 for the 2023/24 financial year and is reviewed annually. It contributes to the cost of employing a Trade Waste Officer, who undertakes monitoring, sampling and enforcement duties.

<p>Option 2a Council's preferred option</p>	<p>Status quo – continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.</p> <p>The annual licensing fee covers approximately half of the costs of managing the Bylaw. This includes property inspections by the Trade Waste Officer, sampling and administration. The balance is recovered from the major industries (conditional category) that also discharge into the wastewater system. This is the Council’s preferred option as the ‘higher’ users would be contributing a greater share without it being overly burdensome.</p>
<p>Option 2b</p>	<p>No annual licensing fee.</p> <p>The costs of managing the Bylaw would be funded from the major wet industries that fall into the Conditional category through the proposed unit charges and from all properties that pay targeted wastewater rates. This option does not address the issue of fairness, as properties that don’t discharge trade waste into the Council network would be subsidising those that do.</p>
<p>Option 2c</p>	<p>Introduce annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.</p> <p>The costs of managing the Bylaw would only be funded from those businesses that discharge waste into the system above the ‘normal’ levels. This figure reflects the actual costs of administering the Bylaw and would mean that the monitoring system is effectively paying for itself with no funding from anywhere else. This is not Council’s preferred option as we believe that a full ‘user pays’ system places too much of a burden on many of the small to medium businesses that provide employment and vibrancy in our towns.</p>

Options to consider - Annual Licensing Fee for Controlled and Conditional categories

Option 2a - Annual licensing fee set annually (currently \$162.00)

3) Separate Charges for Conditional Industries based on Scheme Costs

Across the District, each town discharges its wastewater to a separate treatment plant/scheme. The treatment plants have different costs associated with treating the waste. There are several reasons why costs are different, such as the length of pipe works, the distance to wastewater treatment facilities, or the systems and processes used to treat the waste. The current Bylaw has separate charges for Eltham, Hāwera and the rest of the District and we propose to continue that differentiation.

As a result of the different costs structures for the various schemes, we apply unit charges.

<p>Option 3a Council's preferred option</p>	<p>Status quo – Separate charges for Eltham, Hāwera and the rest of the District.</p> <p>The unit charges for conditional industries will be based on where the business is located, to reflect the actual costs of treatment at each treatment plant. This option best supports the intent of the Bylaw, which is based on a fairer ‘user pays’ system. It is similar to how we charge for high water users.</p>
<p>Option 3b</p>	<p>Standard charges across the District.</p> <p>The charges for each unit (flow, TSS and COD) would be the same irrespective of where the trade waste is being treated.</p> <p>This is not the Council’s preferred option as it would result in industries located in different towns subsidising other industries where the treatment plants have a different treatment system and cost more to operate.</p> <p>New industries that come to South Taranaki may also find it more beneficial to locate themselves in areas with a lower trade waste cost, which could result in localities missing out on new industries being established within their township if we standardise the charges.</p> <p>This option, applied District-wide, partially goes against the intent of the Bylaw, which is based on a fairer ‘user pays’ system that can be applied per scheme.</p>

Options to consider - Separate Charges Based on Scheme Costs

Option 3a - Separate charges for Eltham, Hāwera and the rest of the District

4) Unit Charges for Conditional Premises

The unit charges for conditional premises include charges for flow, total suspended solids (TSS) and chemical oxygen demand (COD). These three elements are commonly used throughout the industry to provide information on the types of trade waste being discharged into the wastewater system.

<p>Option 4a Council's preferred option</p>	<p>Status quo – unit charges for Conditional premises.</p> <p>The proposed unit charges for conditional premises provide a fair user pays system based on the costs related to particular wastewater treatment plants and where an industry discharges its trade waste.</p> <p>The units have been calculated to ensure full cost recovery for treatment and capacity. Future costs involved in the replacement of pipework (‘capex’) are also incorporated into the unit charges to future proof the wastewater treatment schemes.</p>
<p>Option 4b</p>	<p>Change the rate of Unit Charges for Conditional premises.</p> <p>Changes to the rate of unit charges mean the charges would have to be recalculated to ensure that the intent of the Bylaw is maintained to reflect a fair user pays system.</p>

Options to consider - Unit Charges for Conditional Premises

Option 4a - Unit charges for conditional premises as proposed

5) Adoption of the Bylaw

<p>Option 5a Council's preferred option</p>	<p>Adopt the proposed Trade Waste Bylaw.</p> <p>By adopting the Bylaw, the Council will have an ability to monitor and enforce trade waste discharges into its wastewater system. The Bylaw will provide for a fairer 'user pays' system, will protect public health and safety, protect the public wastewater system, protect the environment and help the Council to meet the requirements of the Resource Management Act 1991.</p>
<p>Option 5b</p>	<p>Adopt the Trade Waste Bylaw with changes.</p> <p>The current Bylaw was developed over two years, taking into account actual data to calculate the full impact and user charges, and based on the principles covered above. The proposed Bylaw contains no major changes from the current one and any significant changes may require a reassessment of the impacts and a recalculation of the user charges.</p> <p>There is always the option of not having a Trade Waste Bylaw; however Council considers this is not a realistic or prudent option for the effective, long-term management of our wastewater system. Not adopting a bylaw would also result in the Taranaki Regional Council issuing an enforcement order under the Resource Management Act 1991, because we would not be abiding by the agreement made in 2013 to have a trade waste bylaw.</p>

Options to consider - Adoption of the Bylaw

Option 5a - Adopt the Trade Waste Bylaw as proposed

Do you have any further comments?

I am the Engineering manager accountable for Base and Hawera Hospital. All correspondence and negotiations can happen through me. Regards Philip Olckers

Attached Documents

Link	File
No records to display.	

Trade
Waste
Bylaw



4

Submitter Details

Submission Date: 27/03/2024
 First name: Dinesh Last name: Rana

Preferred method of contact

Postal address: [Redacted]
 Suburb:
 City: [Redacted]
 Country: NZ
 Postcode: [Redacted]

Daytime Phone: [Redacted]

Mobile:

Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.
In Person

Additional requirements for hearing:

Feedback

2) Annual Licensing Fee - for Controlled and Conditional Categories only

To ensure a fair and consistent approach, the current Bylaw includes a licensing system where premises pay an annual licence fee based on the types of discharges they make into the wastewater system. The fee is \$162.00 for the 2023/24 financial year and is reviewed annually. It contributes to the cost of employing a Trade Waste Officer, who undertakes monitoring, sampling and enforcement duties.


<p>Option 2a Council's preferred option</p>	<p>Status quo – continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.</p> <p>The annual licensing fee covers approximately half of the costs of managing the Bylaw. This includes property inspections by the Trade Waste Officer, sampling and administration. The balance is recovered from the major industries (conditional category) that also discharge into the wastewater system. This is the Council’s preferred option as the ‘higher’ users would be contributing a greater share without it being overly burdensome.</p>
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<p>Option 2b</p>	<p>No annual licensing fee.</p> <p>The costs of managing the Bylaw would be funded from the major wet industries that fall into the Conditional category through the proposed unit charges and from all properties that pay targeted wastewater rates. This option does not address the issue of fairness, as properties that don't discharge trade waste into the Council network would be subsidising those that do.</p>
<p>Option 2c</p>	<p>Introduce annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.</p> <p>The costs of managing the Bylaw would only be funded from those businesses that discharge waste into the system above the 'normal' levels. This figure reflects the actual costs of administering the Bylaw and would mean that the monitoring system is effectively paying for itself with no funding from anywhere else. This is not Council's preferred option as we believe that a full 'user pays' system places too much of a burden on many of the small to medium businesses that provide employment and vibrancy in our towns.</p>

Options to consider - Annual Licensing Fee for Controlled and Conditional categories

Option 2a - Annual licensing fee set annually (currently \$162.00)

Attached Documents

Link	File
	Dinesh Rana



Te Kaunihera o Taranaki ki Te Tonga
South Taranaki
 District Council

Puka Tāpaetanga Submission Form

Trade Waste Bylaw 2024

4

Your details

First name/Initials DINESH Last name RANA

Organisation (if applicable)

Address [REDACTED]

Contact Phone [REDACTED] Email [REDACTED]

Do you wish to speak in support of your submission? Yes No
(If no boxes are ticked, it will be considered that you do not wish to speak)

If yes, do you wish to present: In Person Online

Options to consider

1. Category Types

- Option 1a - Introduce proposed category types
- Option 1b - No category system

2. Annual Licensing Fee for Controlled and Conditional categories

- Option 2a – annual licensing fee set annually (currently \$162.00).
- Option 2b – no annual licensing fee.
- Option 2c – annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.

3. Separate Charges Based on Scheme Costs

- Option 3a – Separate charges for Eltham, Hāwera and the rest of the District.
- Option 3b – Harmonised charges across the District.

4. Unit Charges for Conditional Premises

- Option 4a – Unit charges for conditional premises as proposed.
- Option 4b – Change the rate of unit charges for conditional premises.

5. Adoption of the Bylaw

- Option 5a – Adopt the Trade Waste Bylaw as proposed.
- Option 5b – Adopt the Trade Waste Bylaw with changes (please specify the changes you would like to see).

Please provide further comments you may have on the following page.

Submitter Details

Submission Date: 27/03/2024
 First name: Robin Last name: Houghton
 Organisation: Houghtons Plumbing Heating
 and Gas Ltd

Preferred method of contact

Postal address: [REDACTED]
 Suburb:
 City: [REDACTED]
 Country: NZ
 Postcode: [REDACTED]

Daytime Phone: [REDACTED]

Mobile:

Would you like to present your submission in person at a hearing?

- Yes
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<p>Option 1a Council's preferred option</p>	<p>Retain the status quo – the current category types</p> <p>The current categories provide clear definitions of what types of trade waste are permitted, what types require monitoring or sampling (controlled) and what types fall into a higher level of trade waste disposal that requires more treatment (conditional). The Bylaw also provides clear guidelines on what is prohibited trade waste that has the potential to cause damage to the environment or the wastewater system. This classification system gives the Council a method to better identify risk to the wastewater network and provide equity in apportioning costs.</p>
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Options to consider - Category Types

Option 1a - Introduce proposed category types

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Options to consider - Annual Licensing Fee for Controlled and Conditional categories

Option 2c - Annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw

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As a result of the different costs structures for the various schemes, we apply unit charges.

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<p>Option 3b</p>	<p>Standard charges across the District.</p> <p>The charges for each unit (flow, TSS and COD) would be the same irrespective of where the trade waste is being treated.</p> <p>This is not the Council’s preferred option as it would result in industries located in different towns subsidising other industries where the treatment plants have a different treatment system and cost more to operate.</p> <p>New industries that come to South Taranaki may also find it more beneficial to locate themselves in areas with a lower trade waste cost, which could result in localities missing out on new industries being established within their township if we standardise the charges.</p> <p>This option, applied District-wide, partially goes against the intent of the Bylaw, which is based on a fairer ‘user pays’ system that can be applied per scheme.</p>

Options to consider - Separate Charges Based on Scheme Costs

Option 3b - Harmonised charges across the District

4) Unit Charges for Conditional Premises

The unit charges for conditional premises include charges for flow, total suspended solids (TSS) and chemical oxygen demand (COD). These three elements are commonly used throughout the industry to provide information on the types of trade waste being discharged into the wastewater system.

<p>Option 4a Council's preferred option</p>	<p>Status quo – unit charges for Conditional premises.</p> <p>The proposed unit charges for conditional premises provide a fair user pays system based on the costs related to particular wastewater treatment plants and where an industry discharges its trade waste.</p> <p>The units have been calculated to ensure full cost recovery for treatment and capacity. Future costs involved in the replacement of pipework (‘capex’) are also incorporated into the unit charges to future proof the wastewater treatment schemes.</p>
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Options to consider - Unit Charges for Conditional Premises

Option 4a - Unit charges for conditional premises as proposed

5) Adoption of the Bylaw

<p>Option 5a Council's preferred option</p>	<p>Adopt the proposed Trade Waste Bylaw.</p> <p>By adopting the Bylaw, the Council will have an ability to monitor and enforce trade waste discharges into its wastewater system. The Bylaw will provide for a fairer 'user pays' system, will protect public health and safety, protect the public wastewater system, protect the environment and help the Council to meet the requirements of the Resource Management Act 1991.</p>
<p>Option 5b</p>	<p>Adopt the Trade Waste Bylaw with changes.</p> <p>The current Bylaw was developed over two years, taking into account actual data to calculate the full impact and user charges, and based on the principles covered above. The proposed Bylaw contains no major changes from the current one and any significant changes may require a reassessment of the impacts and a recalculation of the user charges.</p> <p>There is always the option of not having a Trade Waste Bylaw; however Council considers this is not a realistic or prudent option for the effective, long-term management of our wastewater system. Not adopting a bylaw would also result in the Taranaki Regional Council issuing an enforcement order under the Resource Management Act 1991, because we would not be abiding by the agreement made in 2013 to have a trade waste bylaw.</p>

Options to consider - Adoption of the Bylaw

Option 5a - Adopt the Trade Waste Bylaw as proposed


Do you have any further comments?

How good is the existing wastewater treatment plant in Hawera?

Question is it fit for purpose or should the STDC invest in upgrading the plant?

Agree with the tighter controls on monitoring discharge from sites that produce waste requiring more treatment.

Attached Documents

Link	File
	Robin Houghton



Puka Tāpaetanga Submission Form

Trade Waste Bylaw 2024

Your details

First name/Initials ROBIN Last name HOUGHTON

Organisation (if applicable) HOUGHTONS PLUMBING HEATING & GAS LTD

Address [REDACTED]

Contact Phone [REDACTED] Email [REDACTED]

Do you wish to speak in support of your submission? Yes No
(If no boxes are ticked, it will be considered that you do not wish to speak)

If yes, do you wish to present: In Person Online

Options to consider

1. Category Types

- Option 1a - Introduce proposed category types
- Option 1b - No category system

2. Annual Licensing Fee for Controlled and Conditional categories

- Option 2a – annual licensing fee set annually (currently \$162.00).
- Option 2b – no annual licensing fee.
- Option 2c – annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.

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- Option 4a – Unit charges for conditional premises as proposed.
- Option 4b – Change the rate of unit charges for conditional premises.

5. Adoption of the Bylaw

- Option 5a – Adopt the Trade Waste Bylaw as proposed.
- Option 5b – Adopt the Trade Waste Bylaw with changes (please specify the changes you would like to see).

Please provide further comments you may have on the following page.



Puka Tāpaetanga Submission Form

RECEIVED
15 MAR 2024
MB.

Trade Waste Bylaw 2024

4

Your Comments

How good is the existing waste water
treatment plant in Hawera?
Question is it fit for purpose or
should the STDC invest in upgrading
the plant?
Agree with tighten controls on
monitoring discharge from sites
that produce waste requiring more
treatment.

(Please continue on a separate page if required)

Submissions close Monday 22 April 2024

Privacy Statement

We collect personal information from you, including your name and contact details. We collect your personal information in order to contact you throughout the Trade Waste Bylaw consultation process.

Besides our staff, we share this information with the public as part of the consultation process to assist with our decision-making on the Trade Waste Bylaw. Providing some information is optional. If you choose not to enter contact details, we'll be unable to contact you with regard to the process, for example, for points of clarification in your submission and the outcomes.

The information collected from you is securely stored and disposed of after 7 years.

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us by email

PrivacyOfficer@stdc.govt.nz, or phone 0800 111 323.

Submitter Details

Submission Date: 10/04/2024
 First name: Kevin Last name: Duthie
 Organisation: Eltham Presbyterian Campsite

Preferred method of contact Email

Postal address: [REDACTED]
 Suburb:
 City: [REDACTED]
 Country: NZ
 Postcode: [REDACTED]
 Email: [REDACTED]

Daytime Phone: [REDACTED]

Mobile: [REDACTED]

Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

1) Category Types

The Trade Waste Bylaw has been developed around a classification system that places a business’s discharge into one of four categories – permitted, controlled, conditional or prohibited.

<p>Option 1a Council's preferred option</p>	<p>Retain the status quo – the current category types</p> <p>The current categories provide clear definitions of what types of trade waste are permitted, what types require monitoring or sampling (controlled) and what types fall into a higher level of trade waste disposal that requires more treatment (conditional). The Bylaw also provides clear guidelines on what is prohibited trade waste that has the potential to cause damage to the environment or the wastewater system. This classification system gives the Council a method to better identify risk to the wastewater network and provide equity in apportioning costs.</p>
<p>Option 1b</p>	<p>No category system</p> <p>This would make it difficult to achieve a fair system because discharges from different premises would be averaged and costs charged uniformly to all ratepayers. This would mean residential and many commercial ratepayers would be subsidising businesses that discharge trade wastes. We currently have separate Trade Waste Agreements with five of the six major wet industries connected to our network.</p>

Options to consider - Category Types

Option 1a - Introduce proposed category types

2) Annual Licensing Fee - for Controlled and Conditional Categories only

To ensure a fair and consistent approach, the current Bylaw includes a licensing system where premises pay an annual licence fee based on the types of discharges they make into the wastewater system. The fee is \$162.00 for the 2023/24 financial year and is reviewed annually. It contributes to the cost of employing a Trade Waste Officer, who undertakes monitoring, sampling and enforcement duties.

<p>Option 2a Council's preferred option</p>	<p>Status quo – continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.</p> <p>The annual licensing fee covers approximately half of the costs of managing the Bylaw. This includes property inspections by the Trade Waste Officer, sampling and administration. The balance is recovered from the major industries (conditional category) that also discharge into the wastewater system. This is the Council's preferred option as the 'higher' users would be contributing a greater share without it being overly burdensome.</p>
<p>Option 2b</p>	<p>No annual licensing fee.</p> <p>The costs of managing the Bylaw would be funded from the major wet industries that fall into the Conditional category through the proposed unit charges and from all properties that pay targeted wastewater rates. This option does not address the issue of fairness, as properties that don't discharge trade waste into the Council network would be subsidising those that do.</p>
<p>Option 2c</p>	<p>Introduce annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.</p> <p>The costs of managing the Bylaw would only be funded from those businesses that discharge waste into the system above the 'normal' levels. This figure reflects the actual costs of administering the Bylaw and would mean that the monitoring system is effectively paying for itself with no funding from anywhere else. This is not Council's preferred option as we believe that a full 'user pays' system places too much of a burden on many of the small to medium businesses that provide employment and vibrancy in our towns.</p>

Options to consider - Annual Licensing Fee for Controlled and Conditional categories

Option 2a - Annual licensing fee set annually (currently \$162.00)

3) Separate Charges for Conditional Industries based on Scheme Costs

Across the District, each town discharges its wastewater to a separate treatment plant/scheme. The treatment plants have different costs associated with treating the waste. There are several reasons why costs are different, such as the length of pipe works, the distance to wastewater treatment facilities, or the systems and processes used to treat the waste. The current Bylaw has separate charges for Eltham, Hāwera and the rest of the District and we propose to continue that differentiation.

As a result of the different costs structures for the various schemes, we apply unit charges.

<p>Option 3a Council's preferred option</p>	<p>Status quo – Separate charges for Eltham, Hāwera and the rest of the District.</p> <p>The unit charges for conditional industries will be based on where the business is located, to reflect the actual costs of treatment at each treatment plant. This option best supports the intent of the Bylaw, which is based on a fairer 'user pays' system. It is similar to how we charge for high water users.</p>
<p>Option 3b</p>	<p>Standard charges across the District.</p> <p>The charges for each unit (flow, TSS and COD) would be the same irrespective of where the trade waste is being treated.</p> <p>This is not the Council's preferred option as it would result in industries located in different towns subsidising other industries where the treatment plants have a different treatment system and cost more to operate.</p> <p>New industries that come to South Taranaki may also find it more beneficial to locate themselves in areas with a lower trade waste cost, which could result in localities missing out on new industries being established within their township if we standardise the charges.</p> <p>This option, applied District-wide, partially goes against the intent of the Bylaw, which is based on a fairer 'user pays' system that can be applied per scheme.</p>

Options to consider - Separate Charges Based on Scheme Costs

Option 3a - Separate charges for Eltham, Hāwera and the rest of the District

4) Unit Charges for Conditional Premises

The unit charges for conditional premises include charges for flow, total suspended solids (TSS) and chemical oxygen demand (COD). These three elements are commonly used throughout the industry to provide information on the types of trade waste being discharged into the wastewater system.

<p>Option 4a Council's preferred option</p>	<p>Status quo – unit charges for Conditional premises.</p> <p>The proposed unit charges for conditional premises provide a fair user pays system based on the costs related to particular wastewater treatment plants and where an industry discharges its trade waste.</p> <p>The units have been calculated to ensure full cost recovery for treatment and capacity. Future costs involved in the replacement of pipework ('capex') are also incorporated into the unit charges to future proof the wastewater treatment schemes.</p>
<p>Option 4b</p>	<p>Change the rate of Unit Charges for Conditional premises.</p> <p>Changes to the rate of unit charges mean the charges would have to be recalculated to ensure that the intent of the Bylaw is maintained to reflect a fair user pays system.</p>

Options to consider - Unit Charges for Conditional Premises

Option 4a - Unit charges for conditional premises as proposed

5) Adoption of the Bylaw

<p>Option 5a Council's preferred option</p>	<p>Adopt the proposed Trade Waste Bylaw.</p> <p>By adopting the Bylaw, the Council will have an ability to monitor and enforce trade waste discharges into its wastewater system. The Bylaw will provide for a fairer 'user pays' system, will protect public health and safety, protect the public wastewater system, protect the environment and help the Council to meet the requirements of the Resource Management Act 1991.</p>
<p>Option 5b</p>	<p>Adopt the Trade Waste Bylaw with changes.</p> <p>The current Bylaw was developed over two years, taking into account actual data to calculate the full impact and user charges, and based on the principles covered above. The proposed Bylaw contains no major changes from the current one and any significant changes may require a reassessment of the impacts and a recalculation of the user charges.</p> <p>There is always the option of not having a Trade Waste Bylaw; however Council considers this is not a realistic or prudent option for the effective, long-term management of our wastewater system. Not adopting a bylaw would also result in the Taranaki Regional Council issuing an enforcement order under the Resource Management Act 1991, because we would not be abiding by the agreement made in 2013 to have a trade waste bylaw.</p>

Options to consider - Adoption of the Bylaw

Option 5a - Adopt the Trade Waste Bylaw as proposed

Do you have any further comments?

The Eltham Presbyterian Campsite is a non profit organization. The committee are volunteers and do not get paid any wages or reimbursement for time. The camp provides a service to mainly school, youth groups, scouts and church groups. Many families use it too. To camp at and enjoy the outdoors.

The campsite only averages 3000 people per year to the camp. That averages out at 8.2 people per night, throughout the year. Our trade waste from the kitchen goes through a grease trap (which has never been blocked since it was built in 1964) into a Tank, which then is pumped up to the end of Bridger Street into the council sewage pipes.

In the kitchen we do not have a deep fryer, and most cooking is done on a hob or in the oven. There is very little fats and oils put into our drains.

Therefore because we are a non profit organisation and have low usage we ask that our premises fees be kept to a minimum so we can keep operating.

Attached Documents

Link	File
No records to display.	

Trade Waste Bylaw



Submitter Details

Submission Date: 18/04/2024
 First name: Tim Last name: Johnson
 Organisation: All Things Automotive

Preferred method of contact

Postal address: [REDACTED]
 Suburb:
 City: [REDACTED]
 Country: NZ
 Postcode: [REDACTED]

Daytime Phone: [REDACTED]

Mobile:

Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

1) Category Types

The Trade Waste Bylaw has been developed around a classification system that places a business’s discharge into one of four categories – permitted, controlled, conditional or prohibited.

<p>Option 1a Council's preferred option</p>	<p>Retain the status quo – the current category types</p> <p>The current categories provide clear definitions of what types of trade waste are permitted, what types require monitoring or sampling (controlled) and what types fall into a higher level of trade waste disposal that requires more treatment (conditional). The Bylaw also provides clear guidelines on what is prohibited trade waste that has the potential to cause damage to the environment or the wastewater system. This classification system gives the Council a method to better identify risk to the wastewater network and provide equity in apportioning costs.</p>
<p>Option 1b</p>	<p>No category system</p> <p>This would make it difficult to achieve a fair system because discharges from different premises would be averaged and costs charged uniformly to all ratepayers. This would mean residential and many commercial ratepayers would be subsidising businesses that discharge trade wastes. We currently have separate Trade Waste Agreements with five of the six major wet industries connected to our network.</p>

Options to consider - Category Types

Option 1a - Introduce proposed category types

2) Annual Licensing Fee - for Controlled and Conditional Categories only

To ensure a fair and consistent approach, the current Bylaw includes a licensing system where premises pay an annual licence fee based on the types of discharges they make into the wastewater system. The fee is \$162.00 for the 2023/24 financial year and is reviewed annually. It contributes to the cost of employing a Trade Waste Officer, who undertakes monitoring, sampling and enforcement duties.

<p>Option 2a Council's preferred option</p>	<p>Status quo – continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.</p> <p>The annual licensing fee covers approximately half of the costs of managing the Bylaw. This includes property inspections by the Trade Waste Officer, sampling and administration. The balance is recovered from the major industries (conditional category) that also discharge into the wastewater system. This is the Council’s preferred option as the ‘higher’ users would be contributing a greater share without it being overly burdensome.</p>
<p>Option 2b</p>	<p>No annual licensing fee.</p> <p>The costs of managing the Bylaw would be funded from the major wet industries that fall into the Conditional category through the proposed unit charges and from all properties that pay targeted wastewater rates. This option does not address the issue of fairness, as properties that don’t discharge trade waste into the Council network would be subsidising those that do.</p>
<p>Option 2c</p>	<p>Introduce annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.</p> <p>The costs of managing the Bylaw would only be funded from those businesses that discharge waste into the system above the ‘normal’ levels. This figure reflects the actual costs of administering the Bylaw and would mean that the monitoring system is effectively paying for itself with no funding from anywhere else. This is not Council’s preferred option as we believe that a full ‘user pays’ system places too much of a burden on many of the small to medium businesses that provide employment and vibrancy in our towns.</p>

Options to consider - Annual Licensing Fee for Controlled and Conditional categories

Option 2b - No annual licensing fee

3) Separate Charges for Conditional Industries based on Scheme Costs

Across the District, each town discharges its wastewater to a separate treatment plant/scheme. The treatment plants have different costs associated with treating the waste. There are several reasons why costs are different, such as the length of pipe works, the distance to wastewater treatment facilities, or the systems and processes used to treat the waste. The current Bylaw has separate charges for Eltham, Hāwera and the rest of the District and we propose to continue that differentiation.

As a result of the different costs structures for the various schemes, we apply unit charges.


<p>Option 3a Council's preferred option</p>	<p>Status quo – Separate charges for Eltham, Hāwera and the rest of the District.</p> <p>The unit charges for conditional industries will be based on where the business is located, to reflect the actual costs of treatment at each treatment plant. This option best supports the intent of the Bylaw, which is based on a fairer ‘user pays’ system. It is similar to how we charge for high water users.</p>
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Option 3b	<p>Standard charges across the District.</p> <p>The charges for each unit (flow, TSS and COD) would be the same irrespective of where the trade waste is being treated.</p> <p>This is not the Council’s preferred option as it would result in industries located in different towns subsidising other industries where the treatment plants have a different treatment system and cost more to operate.</p> <p>New industries that come to South Taranaki may also find it more beneficial to locate themselves in areas with a lower trade waste cost, which could result in localities missing out on new industries being established within their township if we standardise the charges.</p> <p>This option, applied District-wide, partially goes against the intent of the Bylaw, which is based on a fairer ‘user pays’ system that can be applied per scheme.</p>
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Options to consider - Separate Charges Based on Scheme Costs

Option 3a - Separate charges for Eltham, Hāwera and the rest of the District

Attached Documents

Link	File
	Tim Johnson



Te Kaunihera o Taranaki ki Te Tonga
South Taranaki
 District Council

Puka Tāpaetanga Submission Form

Trade Waste Bylaw 2024

Your details

First name/Initials Tim Last name Johnson

Organisation (if applicable) All Things Automated

Address [Redacted]

Contact Phone [Redacted] Email [Redacted]

Do you wish to speak in support of your submission? Yes No
(If no boxes are ticked, it will be considered that you do not wish to speak)

If yes, do you wish to present: In Person Online

Options to consider

1. Category Types

- Option 1a - Introduce proposed category types
- Option 1b - No category system

2. Annual Licensing Fee for Controlled and Conditional categories

- Option 2a – annual licensing fee set annually (currently \$162.00).
- Option 2b – no annual licensing fee.
- Option 2c – annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.

3. Separate Charges Based on Scheme Costs

- Option 3a – Separate charges for Eltham, Hāwera and the rest of the District.
- Option 3b – Harmonised charges across the District.

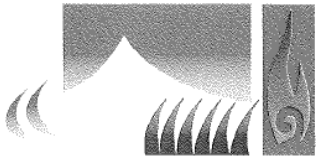
4. Unit Charges for Conditional Premises

- Option 4a – Unit charges for conditional premises as proposed.
- Option 4b – Change the rate of unit charges for conditional premises.

5. Adoption of the Bylaw

- Option 5a – Adopt the Trade Waste Bylaw as proposed.
- Option 5b – Adopt the Trade Waste Bylaw with changes (please specify the changes you would like to see).

Please provide further comments you may have on the following page.



Te Kaunihera o Taranaki ki Te Tonga
South Taranaki
District Council

Puka Tāpaetanga Submission Form

Trade Waste Bylaw 2024

Your Comments

Changes to be made case by case rather than
a blanket change.

(Please continue on a separate page if required)

Submissions close Monday 22 April 2024

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PrivacyOfficer@stdc.govt.nz, or phone 0800 111 323.

Submitter Details

Submission Date: 22/04/2024
First name: KenFee Last name: Tai

Preferred method of contact

Postal address: [REDACTED]

Suburb:

City: [REDACTED]

Country: NZ

Postcode: [REDACTED]

Daytime Phone: [REDACTED]

Mobile:

Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

1) Category Types

The Trade Waste Bylaw has been developed around a classification system that places a business’s discharge into one of four categories – permitted, controlled, conditional or prohibited.

<p>Option 1a Council's preferred option</p>	<p>Retain the status quo – the current category types</p> <p>The current categories provide clear definitions of what types of trade waste are permitted, what types require monitoring or sampling (controlled) and what types fall into a higher level of trade waste disposal that requires more treatment (conditional). The Bylaw also provides clear guidelines on what is prohibited trade waste that has the potential to cause damage to the environment or the wastewater system. This classification system gives the Council a method to better identify risk to the wastewater network and provide equity in apportioning costs.</p>
<p>Option 1b</p>	<p>No category system</p> <p>This would make it difficult to achieve a fair system because discharges from different premises would be averaged and costs charged uniformly to all ratepayers. This would mean residential and many commercial ratepayers would be subsidising businesses that discharge trade wastes. We currently have separate Trade Waste Agreements with five of the six major wet industries connected to our network.</p>

Options to consider - Category Types

Option 1b - No category system

2) Annual Licensing Fee - for Controlled and Conditional Categories only

To ensure a fair and consistent approach, the current Bylaw includes a licensing system where premises pay an annual licence fee based on the types of discharges they make into the wastewater system. The fee is \$162.00 for the 2023/24 financial year and is reviewed annually. It contributes to the cost of employing a Trade Waste Officer, who undertakes monitoring, sampling and enforcement duties.

<p>Option 2a Council's preferred option</p>	<p>Status quo – continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.</p> <p>The annual licensing fee covers approximately half of the costs of managing the Bylaw. This includes property inspections by the Trade Waste Officer, sampling and administration. The balance is recovered from the major industries (conditional category) that also discharge into the wastewater system. This is the Council's preferred option as the 'higher' users would be contributing a greater share without it being overly burdensome.</p>
<p>Option 2b</p>	<p>No annual licensing fee.</p> <p>The costs of managing the Bylaw would be funded from the major wet industries that fall into the Conditional category through the proposed unit charges and from all properties that pay targeted wastewater rates. This option does not address the issue of fairness, as properties that don't discharge trade waste into the Council network would be subsidising those that do.</p>
<p>Option 2c</p>	<p>Introduce annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.</p> <p>The costs of managing the Bylaw would only be funded from those businesses that discharge waste into the system above the 'normal' levels. This figure reflects the actual costs of administering the Bylaw and would mean that the monitoring system is effectively paying for itself with no funding from anywhere else. This is not Council's preferred option as we believe that a full 'user pays' system places too much of a burden on many of the small to medium businesses that provide employment and vibrancy in our towns.</p>

Options to consider - Annual Licensing Fee for Controlled and Conditional categories

Option 2c - Annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw

3) Separate Charges for Conditional Industries based on Scheme Costs

Across the District, each town discharges its wastewater to a separate treatment plant/scheme. The treatment plants have different costs associated with treating the waste. There are several reasons why costs are different, such as the length of pipe works, the distance to wastewater treatment facilities, or the systems and processes used to treat the waste. The current Bylaw has separate charges for Eltham, Hāwera and the rest of the District and we propose to continue that differentiation.

As a result of the different costs structures for the various schemes, we apply unit charges.

<p>Option 3a</p>	<p>Status quo – Separate charges for Eltham, Hāwera and the rest of the District.</p>
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<p>Council's preferred option</p>	<p>Status quo – separate charges for industry, farmers and the rest of the District.</p> <p>The unit charges for conditional industries will be based on where the business is located, to reflect the actual costs of treatment at each treatment plant. This option best supports the intent of the Bylaw, which is based on a fairer ‘user pays’ system. It is similar to how we charge for high water users.</p>
<p>Option 3b</p>	<p>Standard charges across the District.</p> <p>The charges for each unit (flow, TSS and COD) would be the same irrespective of where the trade waste is being treated.</p> <p>This is not the Council’s preferred option as it would result in industries located in different towns subsidising other industries where the treatment plants have a different treatment system and cost more to operate.</p> <p>New industries that come to South Taranaki may also find it more beneficial to locate themselves in areas with a lower trade waste cost, which could result in localities missing out on new industries being established within their township if we standardise the charges.</p> <p>This option, applied District-wide, partially goes against the intent of the Bylaw, which is based on a fairer ‘user pays’ system that can be applied per scheme.</p>

Options to consider - Separate Charges Based on Scheme Costs

Option 3b - Harmonised charges across the District

4) Unit Charges for Conditional Premises

The unit charges for conditional premises include charges for flow, total suspended solids (TSS) and chemical oxygen demand (COD). These three elements are commonly used throughout the industry to provide information on the types of trade waste being discharged into the wastewater system.

<p>Option 4a Council's preferred option</p>	<p>Status quo – unit charges for Conditional premises.</p> <p>The proposed unit charges for conditional premises provide a fair user pays system based on the costs related to particular wastewater treatment plants and where an industry discharges its trade waste.</p> <p>The units have been calculated to ensure full cost recovery for treatment and capacity. Future costs involved in the replacement of pipework ('capex') are also incorporated into the unit charges to future proof the wastewater treatment schemes.</p>
<p>Option 4b</p>	<p>Change the rate of Unit Charges for Conditional premises.</p> <p>Changes to the rate of unit charges mean the charges would have to be recalculated to ensure that the intent of the Bylaw is maintained to reflect a fair user pays system.</p>

Options to consider - Unit Charges for Conditional Premises

Option 4b - Change the rate of unit charges for conditional premises

5) Adoption of the Bylaw

<p>Option 5a</p>	<p>Adopt the Bylaw</p>
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<p>Option 5a Council's preferred option</p>	<p>Adopt the proposed Trade Waste Bylaw.</p> <p>By adopting the Bylaw, the Council will have an ability to monitor and enforce trade waste discharges into its wastewater system. The Bylaw will provide for a fairer 'user pays' system, will protect public health and safety, protect the public wastewater system, protect the environment and help the Council to meet the requirements of the Resource Management Act 1991.</p>
<p>Option 5b</p>	<p>Adopt the Trade Waste Bylaw with changes.</p> <p>The current Bylaw was developed over two years, taking into account actual data to calculate the full impact and user charges, and based on the principles covered above. The proposed Bylaw contains no major changes from the current one and any significant changes may require a reassessment of the impacts and a recalculation of the user charges.</p> <p>There is always the option of not having a Trade Waste Bylaw; however Council considers this is not a realistic or prudent option for the effective, long-term management of our wastewater system. Not adopting a bylaw would also result in the Taranaki Regional Council issuing an enforcement order under the Resource Management Act 1991, because we would not be abiding by the agreement made in 2013 to have a trade waste bylaw.</p>


Options to consider - Adoption of the Bylaw

Option 5b - Adopt the Trade Waste Bylaw with changes (please specify the changes you would like to see)

Do you have any further comments?

The rates and waste costing is far too expensive and things need to change to a more suitable system for business people and domestic purposes

Attached Documents

Link	File
	KenFee Tai



Te Kaunihera o Taranaki ki Te Tonga
South Taranaki
District Council

Puka Tāpaetanga Submission Form

Trade Waste Bylaw 2024

Your details

First name/Initials Ken Fee Last name Tai

Organisation (if applicable)

Address

Contact Phone

Email

Do you wish to speak in support of your submission?
(If no boxes are ticked, it will be considered that you do not wish to speak)

Yes No

If yes, do you wish to present:

In Person Online

Options to consider

1. Category Types

- Option 1a - Introduce proposed category types
- Option 1b - No category system

2. Annual Licensing Fee for Controlled and Conditional categories

- Option 2a – annual licensing fee set annually (currently \$162.00).
- Option 2b – no annual licensing fee.
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3. Separate Charges Based on Scheme Costs

- Option 3a – Separate charges for Eltham, Hāwera and the rest of the District.
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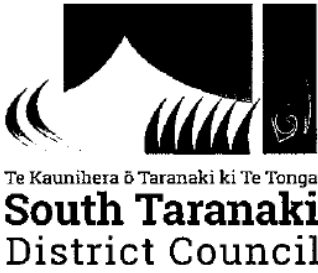
4. Unit Charges for Conditional Premises

- Option 4a – Unit charges for conditional premises as proposed.
- Option 4b – Change the rate of unit charges for conditional premises.

5. Adoption of the Bylaw

- Option 5a – Adopt the Trade Waste Bylaw as proposed.
- Option 5b – Adopt the Trade Waste Bylaw with changes (please specify the changes you would like to see).

Please provide further comments you may have on the following page.



Puka Tāpaetanga Submission Form

4

Trade Waste Bylaw 2024

Your Comments

The rates and water costing
 is far to expensive and
 things need to change to a
 more suitable system, for
 business people and domestic
 purposes.

(Please continue on a separate page if required)

Submissions close Monday 22 April 2024

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Submitter Details

Submission Date: 23/04/2024
 First name: Laura Last name: Jeffries
 Organisation: Fonterra Limited

Preferred method of contact

Postal address: [REDACTED]
 Suburb: [REDACTED]
 City: [REDACTED]
 Country: NZ
 Postcode: [REDACTED]

Daytime Phone: [REDACTED]

Mobile:

Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Feedback

1) Category Types

The Trade Waste Bylaw has been developed around a classification system that places a business’s discharge into one of four categories – permitted, controlled, conditional or prohibited.

<p>Option 1a Council's preferred option</p>	<p>Retain the status quo – the current category types</p> <p>The current categories provide clear definitions of what types of trade waste are permitted, what types require monitoring or sampling (controlled) and what types fall into a higher level of trade waste disposal that requires more treatment (conditional). The Bylaw also provides clear guidelines on what is prohibited trade waste that has the potential to cause damage to the environment or the wastewater system. This classification system gives the Council a method to better identify risk to the wastewater network and provide equity in apportioning costs.</p>
<p>Option 1b</p>	<p>No category system</p> <p>This would make it difficult to achieve a fair system because discharges from different premises would be averaged and costs charged uniformly to all ratepayers. This would mean residential and many commercial ratepayers would be subsidising businesses that discharge trade wastes. We currently have separate Trade Waste Agreements with five of the six major wet industries connected to our network.</p>

Options to consider - Category Types

Option 1a - Introduce proposed category types

2) Annual Licensing Fee - for Controlled and Conditional Categories only

To ensure a fair and consistent approach, the current Bylaw includes a licensing system where premises pay an annual licence fee based on the types of discharges they make into the wastewater system. The fee is \$162.00 for the 2023/24 financial year and is reviewed annually. It contributes to the cost of employing a Trade Waste Officer, who undertakes monitoring, sampling and enforcement duties.

<p>Option 2a Council's preferred option</p>	<p>Status quo – continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.</p> <p>The annual licensing fee covers approximately half of the costs of managing the Bylaw. This includes property inspections by the Trade Waste Officer, sampling and administration. The balance is recovered from the major industries (conditional category) that also discharge into the wastewater system. This is the Council's preferred option as the 'higher' users would be contributing a greater share without it being overly burdensome.</p>
<p>Option 2b</p>	<p>No annual licensing fee.</p> <p>The costs of managing the Bylaw would be funded from the major wet industries that fall into the Conditional category through the proposed unit charges and from all properties that pay targeted wastewater rates. This option does not address the issue of fairness, as properties that don't discharge trade waste into the Council network would be subsidising those that do.</p>
<p>Option 2c</p>	<p>Introduce annual licensing fee for premises in the Controlled and Conditional categories that funds the full cost of operating the Bylaw.</p> <p>The costs of managing the Bylaw would only be funded from those businesses that discharge waste into the system above the 'normal' levels. This figure reflects the actual costs of administering the Bylaw and would mean that the monitoring system is effectively paying for itself with no funding from anywhere else. This is not Council's preferred option as we believe that a full 'user pays' system places too much of a burden on many of the small to medium businesses that provide employment and vibrancy in our towns.</p>

Options to consider - Annual Licensing Fee for Controlled and Conditional categories

Option 2a - Annual licensing fee set annually (currently \$162.00)

3) Separate Charges for Conditional Industries based on Scheme Costs

Across the District, each town discharges its wastewater to a separate treatment plant/scheme. The treatment plants have different costs associated with treating the waste. There are several reasons why costs are different, such as the length of pipe works, the distance to wastewater treatment facilities, or the systems and processes used to treat the waste. The current Bylaw has separate charges for Eltham, Hāwera and the rest of the District and we propose to continue that differentiation.

As a result of the different costs structures for the various schemes, we apply unit charges.

<p>Option 3a</p>	<p>Status quo – Separate charges for Eltham, Hāwera and the rest of the District.</p>
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<p>Council's preferred option</p>	<p>The unit charges for conditional industries will be based on where the business is located, to reflect the actual costs of treatment at each treatment plant. This option best supports the intent of the Bylaw, which is based on a fairer 'user pays' system. It is similar to how we charge for high water users.</p>
<p>Option 3b</p>	<p>Standard charges across the District.</p> <p>The charges for each unit (flow, TSS and COD) would be the same irrespective of where the trade waste is being treated.</p> <p>This is not the Council's preferred option as it would result in industries located in different towns subsidising other industries where the treatment plants have a different treatment system and cost more to operate.</p> <p>New industries that come to South Taranaki may also find it more beneficial to locate themselves in areas with a lower trade waste cost, which could result in localities missing out on new industries being established within their township if we standardise the charges.</p> <p>This option, applied District-wide, partially goes against the intent of the Bylaw, which is based on a fairer 'user pays' system that can be applied per scheme.</p>

Options to consider - Separate Charges Based on Scheme Costs

Option 3a - Separate charges for Eltham, Hāwera and the rest of the District

4) Unit Charges for Conditional Premises

The unit charges for conditional premises include charges for flow, total suspended solids (TSS) and chemical oxygen demand (COD). These three elements are commonly used throughout the industry to provide information on the types of trade waste being discharged into the wastewater system.

<p>Option 4a Council's preferred option</p>	<p>Status quo – unit charges for Conditional premises.</p> <p>The proposed unit charges for conditional premises provide a fair user pays system based on the costs related to particular wastewater treatment plants and where an industry discharges its trade waste.</p> <p>The units have been calculated to ensure full cost recovery for treatment and capacity. Future costs involved in the replacement of pipework ('capex') are also incorporated into the unit charges to future proof the wastewater treatment schemes.</p>
<p>Option 4b</p>	<p>Change the rate of Unit Charges for Conditional premises.</p> <p>Changes to the rate of unit charges mean the charges would have to be recalculated to ensure that the intent of the Bylaw is maintained to reflect a fair user pays system.</p>

Options to consider - Unit Charges for Conditional Premises

Option 4a - Unit charges for conditional premises as proposed


Do you have any further comments?

The Council has sought feedback on options relating to the category, licensing and charges system, with the Council's preference being that the status quo be carried over into the Proposed Bylaw. Fonterra has reviewed the

options and agrees with the Council's approach, namely to:

- 3.4.1. Retain the current category types.
- 3.4.2. Continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.
- 3.4.3. Continue separate charges for Eltham, Hāwera and the rest of the District.
- 3.4.4. Retain unit charges for Conditional premises.

Attached Documents

Link	File
	Proposed Trade Waste Bylaw - Fonterra Limited submission (20240422)_Redacted



Fonterra Limited

Submission on the Proposed Trade Waste Bylaw 2024

To: South Taranaki District Council

By Email: consultation@stdc.govt.nz

Submitter: Fonterra Limited

Contact: Laura Jeffries
Environmental Policy Manager / Kaiwhakahaere Kaupapahere Taiao

Address for Service: [REDACTED]

Telephone: [REDACTED]

Email: [REDACTED]

1. INTRODUCTION

- 1.1. Fonterra Limited (**Fonterra**) appreciates the opportunity to submit on the South Taranaki District Council's (**Council**) Proposed Trade Waste Bylaw 2024 (the **Proposed Bylaw**).

2. BACKGROUND

- 2.1. Fonterra is a global leader in dairy nutrition and is the preferred supplier of dairy ingredients to many of the world's leading food companies. Fonterra is New Zealand's largest company and a significant employer, with more than 12,000 New Zealand based staff and more than 5,800 employees based overseas.
- 2.2. Fonterra is a farmer-owned co-operative, and in 2023 was one of the top ten dairy companies in the world with a turnover of more than \$24 billion annually.¹ It is one of the world's largest investors in dairy research and innovation drawing on generations of dairy expertise to produce more than two and a half million tonnes annually of dairy ingredients, value added dairy ingredients, specialty ingredients and consumer products. These products are exported to over 130 markets worldwide. Annually, Fonterra collects more than 16 billion litres of milk from its 9,000 shareholders, who are a mix of family-owned farms and corporate entities. Fonterra owns 28 manufacturing sites, five brand sites and three logistic/distribution sites in New Zealand.
- 2.3. Fonterra has a number of significant assets and operational interests in the South Taranaki District. These include the:
- 2.3.1. Eltham milk processing site (**Eltham Site**) at 14 Collingwood Street, Eltham;
- 2.3.2. Fonterra Brands' NZ Eltham secondary cheese processing site (**Eltham Brands Site**) at 1 Bridge Street, Eltham;
- 2.3.3. Kapuni milk processing site (**Kapuni Site**) at 879 Manaia Road, Kapuni; and
- 2.3.4. Whareroa milk processing site (**Whareroa Site**) at 84 Whareroa Road, Hāwera.
- 2.4. Dairy is a significant economic contributor to the New Plymouth District and the wider Taranaki Region with the dairy Gross Domestic Product (**GDP**) for the Taranaki Region for the Financial Year ending March 2023 (**FY23**) being \$976 million, representing 12% of the region's total GDP.² Furthermore, with farming and processing wages data for FY23 totaling \$332.8 million, dairy is a significant employer in the South Taranaki District making up 41.4% of the district's

¹"Mary Ledman and Richard Schepers Global Dairy Top 20" (Rabobank, Utrecht, 2023) at p. 1.

²"Solid Foundation Dairy's Economic Contribution to NZ" (4 September 2024) Sense Partners <https://dcanz.com/wp-content/uploads/2023/09/Solid-foundations-Final-04-September-2023.pdf>, Table 6: Dairy GPD by Region.

total wages.³

- 2.5. The Proposed Bylaw has potential implications for the Eltham Site and Eltham Brands Site as both of these sites discharge wastewater into the Council's wastewater network. Fonterra's Kapuni Site and Whareroa Site do not discharge wastewater into the Council's wastewater network. The focus of this submission will therefore be ensuring that the Proposed Bylaw adequately and fairly provides for the ongoing discharge of wastewater into the Council's wastewater network by the Eltham Site and Eltham Brands Site.

Eltham Site

- 2.6. Established in 1985, in a joint venture between NZ Rennet Company and Mainland, the Eltham Site was originally established to manufacture processed cheese. At that time, cheese was packed into cans, mostly for the Saudi market. In the late 1980's the Individually Wrapped Slice (**IWS**) and Slice on Slice (**SOS**) lines were established and installed.
- 2.7. The Eltham Site came under the ownership of Fonterra in 2005, and in 2007 became the main Fonterra site for secondary cheese processing. Products processed at the Eltham Site include a range of cheddar cheeses from 200g to 5kg blocks such as Tasty, Edam, Colby and Mild, SOS processed cheese, IWSs, grated cheese and Quick Frozen Mozzarella. Along with these, the site produces more than 350 individual specification products for Mainland, Anchor, Perfect Italiano, Meadow Fresh and Chesdale, as well as supplying McDonalds, Subway, Pizza Hut, Burger King and KFC. Today, 70% percent of the products produced at the Eltham Site are distributed to more than 50 countries.
- 2.8. Eltham Site is the largest consumer and foodservice cheese manufacturing plant in the Asia/Pacific Region. The SOS plant produces enough cheese for three billion cheese burgers each year while the IWS plant produces 400 million slices per year. The site employs more than 400 people and is actively engaged in the local community. For example, employees from the Eltham Site are involved in food bank collections and participate in Relay for Life. The site's security team also monitors the local schools during their rounds.

Eltham Brands Site

- 2.9. Fonterra Brands is the consumer brands arm of Fonterra in New Zealand. The Eltham Brands Site was established in 1919 as part of the NZ Rennet Company and produces cheese products for Fonterra Brands for distribution to domestic and international markets.
- 2.10. The Eltham Brands Site processes approximately 30,000 litres of milk per day producing a range of speciality cheeses, including blue, white, and yellow mould cheese. The cheese produced at the Eltham Brands Site has received both national and international acclaim. For

³ See above, Table 8: Dairy Wages by District.

example, the site's Kāpiti Kānuka Havarti placed third in the World Champion Cheese Contest in 2020 and, in 2023, its Kāpiti and Mainland cheeses were awarded 39 medals at the New Zealand Champions of Cheese Awards.

- 2.11. The site employs approximately 150 people and is home to the "Eltham Cheese Bar" which sells discounted off cut products to the local community. The site also supports the local community via donations to the Eltham foodbank and rest home.

3. FONTERRA'S RESPONSE TO THE PROPOSED BYLAW

- 3.1. As stated above, the Eltham Site and Eltham Brands Site rely on access to the Council's wastewater network to discharge industrial wastewater from those sites. Critical to the sites' operation is the ability to obtain security of access to, and to have certainty as to the level of investment required to access, this infrastructure (and associated services). As such, Fonterra supports the intent of the Proposed Bylaw being to manage risks to the Council's wastewater infrastructure and fairly distribute costs involved in treatment and disposal facilities.

Proposed changes to the current bylaw

- 3.2. Fonterra has considered the Proposed Bylaw in full and notes that it has been prepared to replace the current Trade Waste Bylaw 2017 (the **2017 Bylaw**) to comply with the Local Government Act 2002. The Proposed Bylaw largely mirrors the 2017 Bylaw, with only minor changes proposed. In particular, new clauses have been proposed allowing Council to require an assessment of permitted activities (clause 10.1.2(a)); requiring the Council to hold an annual review hui with iwi (clause 13.4.6); and setting penalties for non-compliance (clause 14.4). Fonterra is supportive of these additions.

Trade waste agreements

- 3.3. Importantly, the Proposed Bylaw provides for trade waste agreements with the Council with no proposed amendments to the 2017 Bylaw provisions (clause 15.0). Trade waste agreements are a critical tool for Fonterra to ensure long-term security for access to council owned wastewater infrastructure with both Eltham sites currently in the process of renewing their Trade Waste Agreements with the Council. Fonterra is therefore supportive of the inclusion of clause 15.0 with no amendments in the Proposed Bylaw.

Feedback on options provided by Council

- 3.4. The Council has sought feedback on options relating to the category, licensing and charges system, with the Council's preference being that the status quo be carried over into the Proposed Bylaw. Fonterra has reviewed the options and agrees with the Council's approach, namely to:

- 3.4.1. Retain the current category types.⁴
 - 3.4.2. Continue to charge an annual licensing fee for premises in the Controlled and Conditional categories.
 - 3.4.3. Continue separate charges for Eltham, Hāwera and the rest of the District.
 - 3.4.4. Retain unit charges for Conditional premises.
- 3.5. Fonterra agrees and supports the existing category, licensing, and charges system for industrial discharges to the Council's wastewater infrastructure. Fonterra considers that this system facilitates a fair distribution of costs, taking into account both the nature and location of the discharge. This ensures equitable treatment among all industry utilising the Council's wastewater infrastructure.

4. CONCLUSION

- 4.1. Fonterra supports the ability for industry to connect to the Council's wastewater infrastructure. Fonterra considers that the Proposed Bylaw ensures access to essential wastewater infrastructure and related services, while maintaining a fair distribution of costs among industrial users.
- 4.2. Fonterra appreciates the opportunity to make a submission on the Proposed Bylaw.



Laura Jeffries

Environmental Policy Manager / Kaiwhakahaere Kaupapahere
Fonterra Limited

⁴ The Eltham Site and Eltham Brand Site's wastewater discharges are classified as 'Conditional' under the current category system.

Trade
Waste
Bylaw



4

Submitter Details

Submission Date: 23/04/2024
First name: Peter Last name: Conley
Organisation: ANZCO Foods

Preferred method of contact

Postal address: [Redacted]
Suburb: [Redacted]
City: [Redacted]
Country: NZ
Postcode: [Redacted]

Daytime Phone:

Mobile:

Would you like to present your submission in person at a hearing?

- Yes
- I do NOT wish to speak in support of my submission and ask that the following submission be fully considered.

Additional requirements for hearing:

Attached Documents

Link	File
	ANZCO Foods STDC Proposed Trade Waste Bylaw 2024_Redacted



consultation@stdc.govt.nz

22 April 2024

To whom it make concern

**ANZCO Foods Submission
South Taranaki District Council Proposed Trade Waste Bylaw 2024**

ANZCO Foods owns and operates the beef processing plant, ANZCO Foods Eltham. The site – which ANZCO Foods took over in 1996 – is important to the region. We are one of the biggest employers with 520 people on site and the company contributes \$263m to the region through wages, salaries and supplier payments.

ANZCO Foods is making this submission on the proposed Trade Waste Bylaw 2024 to express interest in connecting to the wastewater network managed by South Taranaki District Council.

ANZCO Foods Eltham is currently undertaking a review of wastewater treatment and discharge options to develop a new wastewater management strategy for the plant. The location of the plant sees discharge to the Council's wastewater system (trade waste) as a potential option should connection be available.

Our staff have recently contacted Council staff to discuss the feasibility of this as an option with a meeting scheduled for early May 2024.

ANZCO Foods Eltham is willing to engage consultants to undertake any required assessments and investigations into the feasibility of the connection and discharge.

We are interested in engaging to understand the quality requirements to meet the relevant category standards in in the bylaw.

ANZCO Foods Eltham would like to engage and understand what is required to meet all relevant council bylaws including the Trade waste bylaw (proposed 2024) and Drainage bylaw 2018.

Please let us know if you have any questions and we look forward to discussing this further with you.

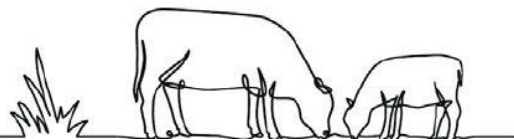
Yours faithfully

Peter Conley
Chief Executive
ANZCO Foods

ANZCO Foods Ltd.



www.anzcofoods.com



5. Karakia

Ruruku Whakakapi – Closing Prayer

Unuhia, unuhia

Unuhia ki te uru tapu nui

Kia wātea, kia māmā te ngākau, te
tinana, te wairua i te ara takatū

Kia wātea, ka wātea, āe rā, kua wātea

Rire rire hau pai marire!

Draw on, draw on,

Draw on the supreme sacredness

*To clear, to free the heart, the body and the
spirit of mankind*

To be clear, will be clear, yes is cleared.

Deeply in peace!