

## Subject - to renew the resource consents associated with the operation of the wastewater treatment plants at Opononi-Ōmāpere, and Kohukohu

My name is Louis Toorenburg, I have resided in the Hokianga since 1975. I worked for the Hokianga County Council on their water supply issues back in the early 1980s, and collected rainfall readings for NRC at Waitotemarama for over 20 years near FNDC water take at Waitotemarama. My involvement with water issues saw me appointed to the Opononi/Omapere Water Liaison Group (OOWLG), I have been involved with the Opononi/Omapere Wastewater plant for about 10 years+.

For many years the Hokianga Harbour and its people have had to bear the burden of treated wastewater in our beautiful harbour. Treated wastewater from Kohukohu, Rawene and Opononi/Omapere and most coming from Kaikohe which also received truckloads of slush from both Russell and until recently Kerikeri for further treatment. Add to that treated septic tank waste (approx. 60%) from much of the north all released into our Hokianga harbour amounting to nearly half of all treated waste from the Far North. See Attached from FNDC Sludge Strategy Options Review Report 23 November 2017

Table 8: Sludge Production Estimates – Summary

WWTP	Total EP Treated by WWTP in 2017 <sup>1</sup> (EP)	Estimated Sludge Production Per Unit Population – Anaerobic Ponds (gDS/EP/d)	Estimated Sludge Production Per Unit Population – Main Treatment Process (gDS/EP/d)	Estimated Total Sludge Production Per Unit Population (gDS/EP/d)	Estimated Total Sludge Production Volumes (m <sup>3</sup> p.a.)
Opononi	770	-	8.9	8.9	34
Ahipara	1320	-	22.4	22.4	171
East Coast	2310	-	9.6	9.6	164
Rangiputa	83	-	9.7	9.7	6
Kohukohu	253	-	10.9	10.9	13
Kaeo	616	-	8.2	8.2	43
Kaitaia (incl Hihi)	16533	-	14.1	14.1	1173
Rawene	1014	4.2	5.5	9.6	77
Paihia	4180	15.2	25.3	40.5	1821
Kaikohe (incl Russell and Kerikeri)	27259	8.7	6.5	15.3	2995
Whatuwhiwhi	550	-	15.6	15.6	61
Kawakawa - Design	6268	8.7	39.6	8.7	665
Kawakawa - Actual	6268	15.8	98.5	15.8	1206
Hihi (to Kaitaia)	352	-	45.0	45.0	365
Russell (to Kaikohe)	1980	-	34.6	34.6	834
Kerikeri (to Kaikohe)	2332	-	58.8	58.8	1669
<b>TOTAL</b>	<b>61155</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>

Table 4: Septic Sludge Solids Estimates

WWTP	Septage EP in 2017 - incl Summer (EP)	Septage Volumes (m <sup>3</sup> p.a.)	Septage TSS (kg/d)	Septage VSS (kg/d)	Septage TSS Contribution (gDS/EP/d)	Assumed Septage Discharge Point
Kaitaia	9889	3580	137	59	13.9	Oxidation Pond
Rawene	365	132	5	2	13.9	Anaerobic Pond
Kaikohe	18239	6603	253	108	13.9	Anaerobic Pond
Kawakawa	4508	1632	63	27	13.9	Anaerobic Pond
<b>Total</b>	<b>33000</b>	<b>11947</b>	<b>459</b>	<b>196</b>	<b>-</b>	<b>-</b>

At the 2018 census The Far North had a population 65,250 of which 31,503 were Māori this was made up off North Hokianga, population 795 of which 648 (over 80%) were Māori, South Hokianga 1236, Māori 780 (over 60%) and Kaikohe 4,437 Māori 3,477. The Hokianga has a large Māori population nearly 70%

The Hokianga Harbour is the food basket for its people and the threat to our food basket from treated waste is unacceptable and culturally unacceptable. This has to stop. Many Marae no longer take shellfish from the Hokianga for hui or tangi because of safety concerns many having to buy elsewhere to feed their visitors.

And to expect future generations in Hokianga to be happy with this is not acceptable, come on guys 35 years more with little change, a time of potential population growth, we shouldn't have to put up with all this shit let alone expect our kids and theirs to do so. Our Hokianga Harbour has a problem now, let start cleaning it up, now.

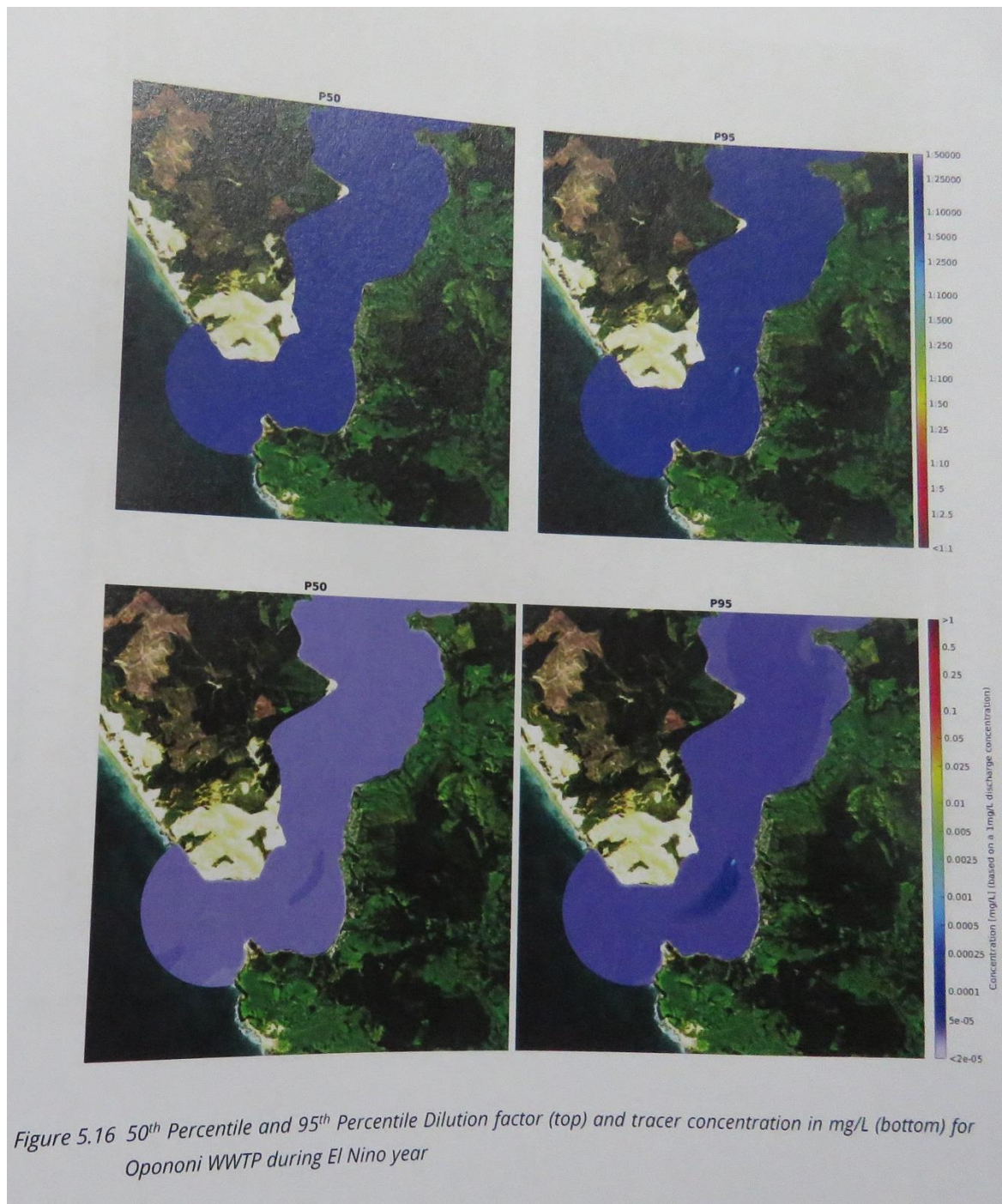
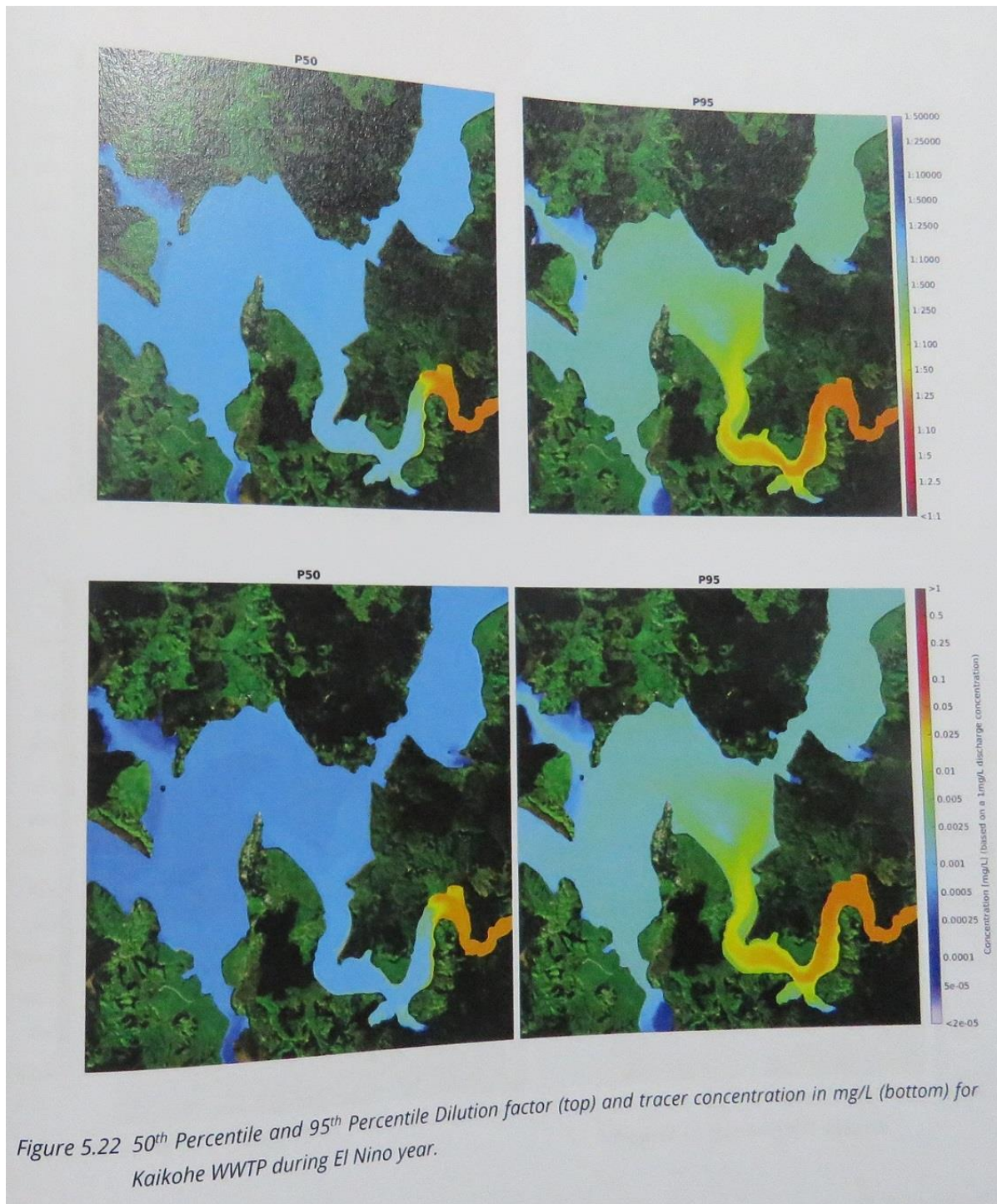


Figure 5.16 50<sup>th</sup> Percentile and 95<sup>th</sup> Percentile Dilution factor (top) and tracer concentration in mg/L (bottom) for Opononi WWTP during El Nino year



Today it is Opononi/Omapere and Kohukohu turn, but not far behind comes Rawene and Kaikohe, let's look at the whole of the Hokianga and start putting in place policies and practises that clean up our Hokianga now and for future generations and not give us more of the same.

- We cannot burden the Hokianga Harbour any longer and it is time to consider the whole Hokianga Harbour, alternatives needed are land based systems as well as such new technology such as electrocoagulation. Let's not put the burden of a clean harbour on future generations. Waste into our harbour is not only unsafe but also culturally unacceptable

- I would like to see the ridiculous 35 years of this consent changed to something like 5 years, so that the future health of the Hokianga can be assessed and fixed.
- It may be even possible to put this consent on hold for 5 years or so to address all the problems of current practices.
- Alternatives can be expensive but with 3 Waters funding may be available to help with this. Let's see what the future brings us with 3 Waters.
- Concerns for the environment and our people of current practices. Shellfish beds are reducing and, in some areas, disappearing.

### Opononi/Omapere

For many years the Opononi plant has not been working at its optimal level, its e-coli readings have been above acceptable levels since 2016 with discharges going into the harbour creating safety concerns.

- NRC has an abatement notice in place on FNDC since sept 2016 for e-coli, but ammonia and nitrates are also problems.
- FNDC has taken the largest wetland cell out of use, against the wishes of the liaison group, other cells haven't always been working at optimum levels,
- cattle access to the cells being totally unacceptable, I have previously included photos, I understand this has been resolved with new fencing. The main problem however still exists wild cattle in the Catchment area.
- The outlet pipe has broken off and is now considerably shorter, FNDC denies having any complaints in their application, From page 12 Application to renew resource consents for the Opononi Wastewater Treatment Plant 17 May 2019 *"Neither FNDC nor NRC1 have any records of any complaints about the colour and visual clarity of the discharge. FNDC understand, from discussions with community members, that there may be an obvious plume when the wastewater is discharging from time-to-time."*
- There have been complaints received by both NRC and FNDC. **(See attachment 1 at the end of my submission.)**



- Above Picture shows where lighter coloured water from wastewater plant enters the Hokianga Harbour as you can see quite a large and obvious plume, which then is supposed to mix with water in harbour and then flow out into the ocean.

- Water safety testing is done at popular beaches in the Hokianga, one was a very popular beach at Old Wharf Road, sheltered and safe for families, however testing of waters there kept getting unsafe readings as the water tends to come in there bringing with it treated waste, most likely cause the reduced pipeline length, hence the complaints and this popular beach being closed because of unsafe readings.
- It concerns me greatly that NRC water readings were moved from this beach to the Omapere wharf where water is faster flowing and safe readings are produced.
- The Hokianga is a holiday destination, many businesses rely on visitor numbers especially busy summer months, however unsafe swimming signs going up in popular areas creates issues for visitors, locals and businesses so reliant on the busy summer trade.
- I have attached the contents below of a letter from Opononi/Omapere Water Liaison Group (OOWLG) Subject: Unacceptable performance of the Opononi Waste Water Treatment Plant (WWTP) and comprehensive environmental study of Hokianga harbour to the NRC it expresses the concerns of the group of which I was part off, with the handling by FNDC of wastewater plant. I am sure other members of the group disbanded by FNDC over legal issues that were raised by some members in the community with regard to more representation on the group. **(see attached 2 at the end of my submission)**
- It concerns me that FNDC was going to be soliciting legal opinions of the issue of representation and put on hold the work the of OOWLG for a couple of months. It was at a time when the group was trying to organize a public meeting with the local community to make the community aware of where FNDC was at with the Resource Consent Application.
- Melissa Parlane mentions this in her material from 3rd May 2023 -----
- *58. Opononi and Omapere Water Liaison Group (51), Ngatikorokoro Trust for Nga Hapu o te Wahapu o Hokianga Nui a Kupe (7) and others expressed concerns regarding the apparent conclusion of the Community Liaison Group (CLG) and lack of community engagement since 2019. Mr. Tucker provides some background to the situation at the time. I wrote to the OOWLG on behalf of Council on 17 December 2019. I also wrote to other parties on the same day with the same undertaking to obtain a legal opinion on the appropriate membership for the Community Liaison Group (CLG). I requested legal advice on the matter from our in-house legal counsel. When I returned from the Christmas Break in 2020, I was seconded into a crisis response team to manage the drought affected water supplies. As the drought wrapped up a few months later, the pandemic set in. The Council never completed a legal review to my knowledge. A meeting with the CLG has not been called since.*
- Melissa Parlane also added and I would agree with much of what she said here with numerous Council staff changes, it concerned me and other community members having to re-educate new staff and at times having to deal with different approaches and interpretation new staff brought with them, The community members of the group stayed constant for much of the time of the CLG
- *59. Community liaison groups (and variations thereof) provide a regular connection between Council and community. They build trust by enabling transparency. For a CLG to be effective they require a huge amount of resourcing from both community and Council. The effectiveness of the CLG is often hindered by staff turnover at FNDC. In my experience exposure to CLG can contribute to staff turnover; staff are not adequately supported (by admin staff or by decision makers) and the often-confrontational meetings take their toll on staff's wellbeing. Any decision to continue a CLG, Working Group or similar needs careful thought as to the make-up of the group, their purpose, and their longevity*

- It also concerns me that at one of our meetings when FNDC staff member and Committee members were at odds over some of what FNDC wanted to achieve, and a comment by staff was made that the Council didn't need us and that it would do what Council wanted to anyway, or words to that effect.
- I talked to Melissa Parlane on a number of occasions asking her if a legal opinion had been obtained and when we could go back to work as a group as it was at an important part which included organizing a community consultation meeting with the local residents. Sadly we never got an answer and we were never able to get back to the table to move things forward.

### **Kohukohu**

I will basically restate what I have said in my submission, my involvement in the Kohukohu wastewater plant is minimal, but my main concerns are about the state of the Hokianga Harbour and want to see changes that will make improvements to our harbour.

- Discharge into the Hokianga Harbour - It is time to look at alternatives instead of continuing discharge into the Harbour, for yet another generation.
- Our Hokianga Harbour is severely stressed, our shellfish beds and food basket are under pressure with pollution into the Harbour Hokianga. Marae are now having to source their shellfish from outside the area as they have concerns for people's safety and are not prepared to serve Hokianga gathered shellfish.
- I know the Kohukohu scheme is small compared to the other sewerage schemes discharging into our food basket. Hokianga population is predominately Māori and for them it is culturally offensive for human waste to be deposited in their Harbour. I am sure that for others they too have concerns.
- It is now time to become proactive instead of largely continuing with the Status Quo, there have been many advances made in getting rid of our waste, and alternatives should be looked at these include land-based systems in conjunction with electrocoagulation,
- Council also needs to look at the wider problem of treated waste into our Harbour, and all schemes releasing waste water into our harbour should be addressed the same way as other schemes come up for renewals, we can't keep asking future generations to deal with the Hokianga problem. And in Opononi case for 35 years. I am glad that waste from Kerikeri is now no longer being taken to Kaikohe for further treatment and then the wastewater released into the environment and ending up in the Hokianga Harbour. When Kerikeri was ending up here the treated waste from nearly half of the Northlands population was ending up in the Hokianga approx. 30,000 people's treated wastewater. However, the waste from Russell is still being trucked to Kaikohe which is added to large discharges from the main settlement of Kaikohe ending up in the Harbour. Much of it taking a long time or ever flushing out to the Tasman
- To use a land-based system and look at including new advances like electrocoagulation. And to require all other wastewater plants now discharging into the Hokianga Harbour be converted to land-based systems.

### **To Sum Up**

- Continuing doing what we have been doing for years is no longer the solution.

- A look at a whole Hokianga solutions should become the approach, alternatives are available
- Protect our food basket, it is essential for our survival especially in this poorer community
- 35 years is way too long for any consents that puts a burden on our Harbour placed on future generations, it doesn't allow for advances in new technology
- Potential harm to the environment and its people of current practices

### Attachment 1

-----Original Message-----

From: Doug McKenzie [mailto:dlmk@xtra.co.nz]

Sent: Friday, 16 February 2018 6:35 AM

To: 'Pania Te Whaiti' <paniat@nrc.govt.nz>

Cc: 'Ask Us Team' <ask.us@fndc.govt.nz>

Subject: RE: Hokianga Harbour Omapere

Hello again Pania

The fact that Omapere got a good reading on Monday this week after heavy rain on Sunday seems to confirm my suspicion that the problem that we discussed earlier was caused by a malfunction of the Opononi/Omapere treatedsewerage system that goes into the Hokianga Harbour. But Far North District Council are not replying to my queries of 30th Jan, repeated 12th Feb. They just reply that they have referred my query to their wastewater dept. Are you able to get the information that I am asking for - was there any problem with the treated sewerage that went into the Harbour Jan 21, 22, 23?

My reason for pursuing this request is that after your first bad reading on Monday 22nd hundreds of people had their health put at risk because they swam in the contaminated water not knowing there was a problem. (And the warning sign put up in a tree near our home at Pioneer Walk on Friday 26<sup>th</sup> did little to help as only a handful of people saw it.) I am aware that the warning was on the excellent LAWA website but I haven't found anybody other than me who goes to that website.

I maintain that if the problem was caused by the treated sewerage that should have been known immediately as I assume that outflow is monitored daily, and prominent warning signs should have been put up immediately.

Regards

Doug McKenzie

Omapere

-----Original Message-----

From: Pania Te Whaiti [mailto:paniat@nrc.govt.nz]

Sent: Wednesday, 31 January 2018 10:18 AM

To: Doug McKenzie <dlmk@xtra.co.nz>

Subject: RE: Hokianga Harbour Omapere

Hi Doug,

Thank you for your email.

We have initiated microbial source tracking (MST) investigations to assist with identifying the source of faecal contamination at Omapere. However, due to the type of analytical testing required we may not have the results until March 2018. For your information, please see the following link about MST: <http://www.waterquality.org.nz/home/faecal-source-tracking/source-tracking-strategy-2/> .

In the meantime, and as per your request, we will collect a sample at the wharf next week to investigate the extent of contamination. If the results are similar between the two sites (Pioneer Walk Road and Omapere Wharf) then we will discuss with the Far North District Council about the possibility of erecting another sign closer to the wharf if/when required.

I will also get in touch with our wastewater team to see if the sewerage system could be investigated after heavy rainfall.

I hope this is helpful, but please feel free to get in touch if you have any further questions.

Kind regards,

Pania

Environmental Monitoring Officer - Water & Air, Regulatory Services

-----Original Message-----

From: Doug McKenzie [mailto:dlnk@xtra.co.nz]

Sent: Tuesday, 30 January 2018 1:52 p.m.

To: Pania Te Whaiti <paniat@nrc.govt.nz>

Subject: Hokianga Harbour Omapere

Hello Tania

I was given your name and email address by Brooke when she tested the seawater at Pioneer Walk, Omapere this morning.

The tests last Monday and Wednesday were bad but I understand that you have not yet been able to test at other places along the 2km sandy beach to determine how widespread this problem is (or was). One warning sign has been put up and this is at the place where the testing is done at one end of the bay and only a handful of people have seen the sign since it was put up last Friday afternoon. Hundreds of people have been swimming in front of the Copthorne (which is only 50 - 100 metres from where the testing is done) and from the Omapere wharf (perhaps 200m from the testing place). These people don't go past the sign. I would like to suggest that if the problem continues or if there is more rain then the water should be tested at the Omapere wharf as well as at Pioneer Walk to get some idea of how widespread the contamination is.

If it is just as bad at the wharf then obviously more signs need to go up.

This could be the beginning of an effort to determine the cause of the problem. If you look back over the last few years I am sure that you will find the water is good most of the time.



If the contamination occurs only after rainfall then perhaps we could find which streams and drains are bringing that contamination.

If the contamination occurs because of problems with the outflow into the Harbour of the Opononi-Omapere sewerage system then that needs to be dealt with.

We really would appreciate at least a beginning to try to understand this problem better and I am suggesting testing at the Omapere wharf as a beginning.

With thanks

Doug McKenzie

4 Pioneer Walk

Omapere

## **Attachment 2**

To: Northland Regional Council CEO – Malcolm Nicolson

cc: Northland Regional Council Chairman – Bill Shepherd, FNDC Mayor - John Carter

From: Opononi/Omapere Residents & Ratepayers Association (OORA) and Opononi/Omapere Water Liaison Group (OOWLG)

Subject: Unacceptable performance of the Opononi Waste Water Treatment Plant (WWTP) and comprehensive environmental study of Hokianga harbour.

Dear Malcolm,

The residents & ratepayers of Opononi & Omapere would like to understand why the Opononi Waste

Water Treatment Plant (Opononi WWTP) has been non-complaint since the NRC first issued an abatement notice on the FNDC in April 2016. Since this notice was first issued, there has been elevated e.coli levels recorded on the outflow of the WWTP into the Hokianga harbour.

The Hokianga harbour is considered a food basket for the community and it is culturally unacceptable for the harbour to be contaminated. We would like NRC to meet with OOWLG in coming weeks to address the issues detailed in this letter. Broadly, we would like the Opononi WWTP issues addressed and secondly, a complete, comprehensive environmental study of the Hokianga harbour.

The outcome the community is looking for, is for the Opononi WWTP to meet the resource consent requirements set by the NRC and the WWTP producing cleanest possible water being either disposed in the harbour or preferably land based. Our preference would be not to trigger immediate legal action on the FNDC unless there was no other option possible.

The OOWLG is a small and experienced task force representing the community on matters relating to the Opononi WWTP and Omapere/Opononi water supply. This was formed in approximately 2006, meets with the FNDC to discuss issues and OOWLG is a requirement of the WWTP resource

consent. Our most recent meeting with FNDC was on 4 December 2018, where we discussed maintenance of the current plant and possible future enhancements to the plant. This meeting was productive, with a number of FNDC personnel describing the various options available for the Opononi WWTP. Unfortunately there were few outcomes and conclusions.

The current resource consent for the WWTP expires in August 2019. OOWLG would like the following actions to be enforced and be a requirement of the resource consent being renewed.

1. The OOWLG to have recognised negotiation powers as part of the consent. OOWLG to continue to meet biannually with the FNDC to discuss ongoing requirements.
2. OOWLG would like an independent specialised engineering company to deliver a report detailing:
  - a. An assessment of the current Opononi WWTP design, including efficiency & effectiveness for the population.
  - b. Future possible options that would enhance the effectiveness of the WWTP with associated costs. Some of the options to be considered:
    - i. Two anaerobic ponds prior to the existing aerobic ponds
    - ii. UV treatment before discharge into the harbour
    - iii. In 2014 a study of land based disposal was undertaken. We would like this report to be reviewed and updated based on current understanding and available technologies.
    - iv. Any other option commercially available that is maintainable by FNDC and cost effective.
3. Part of the terms of the current resource consent, is to notify OOWLG when issues with the WWTP are identified and provide written verification when work has been completed. There are numerous examples where this did not happen. This needs to be enforced.
4. The maintenance of the WWTP has been inadequate. This was acknowledged by FNDC during our December 4 meeting. A formal maintenance plan needs to be devised and resourced.
5. Desludge the two aerobic ponds. This is currently being done and is well overdue
6. Reinstate wetland cell one. This was decommissioned some time ago.
7. Wetland cells 2-5 have been poorly maintained, where weeds are growing displacing the active plants. These cells need to be reinstated.
8. For more than 10 years a section of the outflow pipe in the harbour is missing as result of storm activity. A hydrological study needs to be undertaken to determine where to place the outflow pipe for optimal results.
9. At the December 4 OOWLG/FNDC meeting future options were discussed without conclusions being reached. The community would like to see the following options reviewed by an independent engineering group to indicate effectiveness and costs of each option:
10. Based on FNDC performance with the current resource consent, the community is requesting NRC grant the minimal term for the resource consent to be issued in August 2019. The new resource consent is to be publically notified.

Given that there are approximately 400 households contributing with rates to the capital costs of our water & WWTP's and the socio-economic profile of the area, any development costs are an important consideration.

Further to the improved health of the Hokianga harbour, the OORA have requested that a comprehensive study of Hokianga Harbour be undertaken. This was proposed as part of our NRC and FNDC long term plans. A similar study was undertaken for the Kaipara harbour from 2012-2018 with constructive conclusions and outcomes. On 26 January 2019 a Hokianga alliance will be forming, consisting of all communities & Hapu of the Hokianga. The harbour study is on the agenda, where we will be formalising support from the wider Hokianga community. The relevant Government agencies, Scientific & Engineering groups will need to be involved. Initially, the objectives and scope of the study will need to be defined in consultation with the community. Possible contributors to the health of the harbour are: all of the WWTP for all the settlements around the harbour; Kaikohe WWTP outflow was redirected from the east coast to rivers leading into the Hokianga harbour; Lake Omapere; Agriculture and Contaminants entering the harbour from the NZ coastline.

Your guidance on how we can proceed with this study would be very welcome. You and your team are also welcome to attend the Hokianga Alliance meeting on the 26 January 2019 at the Rawene Hall from 1-4pm.

Could you also suggest a date/time OOWLG can meet with NRC?

Yours Faithfully

Graham Tucker, Deputy Chairman OORA & member of OOWL