

**From:** [Nicole Anderson](#)  
**To:** [Alissa Sluys](#)  
**Cc:** [Hokianga Takiwa](#); [Piripi Moore](#)  
**Subject:** APP. 003839.01.03 & APP. 002667.01.04 Opononi Omapere and Kohukohu Wastewater treatment resource consents  
**Date:** Friday, 29 September 2023 3:22:20 pm

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**To:** Hearing Commissioners, Northland Regional Council  
**Submitter:** Nga Ngaru o Hokianga Takiwa  
**Submission on:** Revised Consent Conditions for Opononi/Omapere Wastewater Treatment Plant and the Kohukohu Wastewater Treatment Plant  
**Applicant:** Far North District Council  
**Description of activity:** Discharge permit to discharge wastewater

Tena koe,

Nga Ngaru o Hokianga Takiwa is the Takiwa for 13 marae of south Hokianga and is part of Te Runanga A Iwi O Ngapuhi, the mandated iwi organisation for Ngapuhi.

I have experienced technical difficulties today, with the original email sent this morning 'bouncing back', so I am re-sending.

In addition to our original submission our Takiwa provide the following submission:

- Pleased to see that the time frame for the consents is now three years.
- We don't support the increase of the quantity nor the lowering of the quality of the discharge. The applicant should be required to improve the treatment and bring it to current compliance levels.
- We support the two proposed CLG, however, it is for the local people to determine the makeup of these CLG. The groups should be led by local hapu, supported by the community and whomever else these groups choose to bring in to their roopu. The CLG should set their own Terms of Reference.
- FNDC should work alongside the CLG to find and set milestones to achieve zero human waste to water from these WWTP, and to find culturally, environmentally, socially and economically viable solutions to human waste in these areas, within the three-year term.
- The Terms of Reference for the combined working groups of the CLG and FNDC should be written by the CLG. The CLG should have control of meeting times and places, agenda, and purpose. We expect there to be milestones set by the combined working group towards achieving the goal of appropriate wastewater treatment within the three-year term.
- Should mana whenua choose to include cultural monitoring, this should be supported by the applicant, to be carried out on the terms set by mana whenua.
- There should not be a requirement for the chemically assisted solids removal and UV in Opononi Omapere if there are acceptable alternatives- seeking these alternatives is a part of the mahi of the CLG and FNDC working group.
- Additionally, we recommend that the applicant supports cultural monitoring practises if they are recommended by Ngati Korokoro (Opononi/Omapere consent), or Te Ihutai (Kohukohu consent).
- We do not support the median and 90<sup>th</sup> percentile concentrations proposed by the applicant. Not only do they exceed limits prescribed by the previous resource consent, but there is also a real danger in these figures acting as the new existing baseline in a subsequent consent. If these Conditions are accepted, there is a foreseeable danger in concentration limits simply driving higher and higher in future consents. That must be avoided.
- We support; That a 95<sup>th</sup> percentile limit is introduced; that discharge of contaminants do not exceed previously consented limits; that the CLG be given opportunity to seek other solutions, and not be forced into accepting the solids removal and UV treatments.
- We ask that milestones are introduced to investigate and implement alternative forms of discharge.
- We support the following timeline:
  - Year one:**
    - CLG is formed and sets the Terms of Reference, outlining key milestones;
    - The applicant gains a clear understanding of the cultural values and information that hapu (for the Opononi/Omapere consent and the Kohukohu consent)/ choose to share, with the expectation that this information will inform the process;
    - Cultural values, sites, tikanga are given the weight that the CLG chooses in any decision making matrix
    - Investigate and analyse precedents for wastewater treatment and land-based discharge. This includes local examples such as Rawene and Taipa;
  - Year two:**
    - a thorough, on the ground, investigation and analysis of suitable site/s for treatment and discharge, including engagement with land owners.
  - Year three:**
    - work with the applicant and CLG to find funding to set the system in motion.

Heoi ano, nga manaakitanga ki a koe,

Nicole Anderson  
Trustee  
Nga Ngaru o Hokianga Takiwa