

Compliance Monitoring Report 2016-17



environment
SOUTHLAND
REGIONAL COUNCIL

Te Taiao Tonga



Environmental Compliance Monitoring Report

2016/17

**Report by –
Environment Southland
Compliance Team**

Environment Southland Publication No 2017/07
ISBN No 978-909043-21-6

Foreword

The 2016/17 Compliance Monitoring Report contains a summary of compliance for each of Southland's major catchments.

This summary identifies the spread of dairy discharge consents throughout every catchment, where the industry areas are centred and the location of whitebait stands. Each catchment's compliance with discharge consents and overall industry compliance is noted.

The summary is also an opportunity to highlight some key facts and introduce the compliance officer for each catchment.

It's again been a year of pleasing results with industry, incidents and the dairy sector.

There continues to be a strong focus on compliance within the dairy sector.

The rate of significant non-compliance remains below 5%, (4.1%) which reinforces the progress made and is a reflection of the hard work of the dairy sector and the compliance team.

The partnership between Environment Southland and major dairy industry players to support farmers needing to improve effluent management practices was recognised during the year when it was nominated as a finalist in the Local Government New Zealand EXCELLENCE Awards.

The Awards recognise and celebrate the key leadership role that local government plays in communities around the country.

Our compliance approach is based on the 4E's (Enable, Encourage, Educate and Enforce), which remain at the heart of what we do, and the highly successful 'shed talk' programme continues to be a key tool for our compliance team.

Shed talks are an opportunity to go through the requirements of an effluent discharge consent together with consent holders, managers and other farm staff in a setting they are comfortable in – their shed.

The technical team have also been meeting regularly with industry consent holders to encourage, enable and educate them to comply with their consents.

The compliance team have contact with an estimated 1,500 Southlanders per year, making them one of the busiest teams at Environment Southland.

Communication is key to getting word out about what we do and why and ranges from Facebook posts, to direct contact with community representatives, and/or media releases.

This year there was a slight increase of incidents reported to the compliance division. In the 2016/17 year there were 714 incidents reported and investigated – compared to 668 incidents reported in the 2015/16 year.

The variety of incidents reported to the compliance division can be extremely wide and covers all manner of environmental incidents. A lot of incidents are reasonably rudimentary and can be completed in a short time frame. There are some incidents that can start major investigations that have taken months to arrive at a resolution.

The number of infringement notices issued in 2016/17 was similar to the two previous years with 32 compared to 26 in 2015/16 and 36 in 2014/15.

The Council would like to take the opportunity thank compliance manager Simon Mapp and his team for their dedication and commitment in carrying out their role in a fair and equitable manner. They are appreciated and respected by clients and ratepayers.



N G Horrell
Chairman
Environment Southland



NMG Cook
Chairman
Regulatory Committee

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Introduction

Environment Southland's Compliance Monitoring Report has been designed to provide an overview of compliance activities from across Southland during the 2016/17 year. It does not cover all of the activities of the area in detail.

Activities with similar parameters, particularly enforcement, incidents, dairy discharge consents and whitebait stands, have been combined to give a broad overview, rather than reporting on individual conditions or circumstances.

In this report, the dairy industry is reported as a collective as the consent conditions for each farm are similar and compliance with these can be easily compared. Dairy inspections result in each farm receiving a grade which ranges from 1: Full compliance through to 10: Significant non-compliance.

Other industries reported here are either the only one of their type in Southland, or significant differences exist between them that would make comparison of their consent conditions too difficult.

Major industrial consents, or those of special interest to Southland, have been identified and are included in the report. Industrial consents are often very complex. This is largely due to the nature of the activity and volume of contaminants that an industry uses or discharges. The industries reported here often have their own environment assessment teams, or use third party contractors to complete the requirements of their consent.

For each of the major industry reports, a table has been included to assess how well the company has kept Environment Southland informed of monitoring results and how they respond to issues. A second table provides an overall assessment of performance against their consent conditions.

Both tables provide a rating in the form of a traffic light system and a comparison between the 2014/15 and 2015/16 year (see below).

Key

Site or consent holders name			
Description of noteworthy event	14/15	15/16	16/17
	Background denotes overall results for year shown in box		

Year

Grading

	<i>Compliance Grade</i>
	FULL COMPLIANCE – Compliance with all relevant consent conditions, plan rules, regulations and national environmental standards.
	LOW RISK NON-COMPLIANCE - Compliance with most of the relevant consent conditions, plan rules, regulations and national environmental standards. Non-compliance carries a low risk of adverse environmental effects or is technical in nature (e.g. failure to submit a monitoring report).
	MODERATE NON-COMPLIANCE - Non-compliance with some of the relevant consent conditions, plan rules, regulations and national environmental standards where there are some environmental consequences and/or there is a moderate risk of adverse environmental effects.
	SIGNIFICANT NON-COMPLIANCE - Non-compliance with many of the relevant consent conditions, plan rules, regulations and national environmental standards where there are significant environmental consequences and/or a high risk of adverse environmental effects.

Also considered in the gradings are the completeness and quality of the results, evidence of contingency planning, prompt notification of events, completion of full and thorough investigations, maintenance of good communications with Environment Southland, proactive in addressing or highlighting potential issues and evidence of environmental ethics.

After consultation with consent holders and stake holders we decided for this report to add a fourth compliance grade (yellow) to better reflect consent performance.

This report is separated into three main parts, Inspection and Audit Activities, Incident Response, and Enforcement.

Since the first Compliance Monitoring report in 1998, the format and detail of the report has changed. If there is an area you would like to see more detail on or something you would like added to the report next year, please let us know.

Part A

Inspection and Audit Activities

1.0 Agricultural Audits

There is a continuing downward trend in all facets of non-compliance within the dairy sector, most pleasingly in the serious non-compliance category.

1.1 Dairy Inspection Overview

The compliance team undertakes inspections of dairy farms to ensure that there is compliance with the conditions of discharge consents. Discharge consents allow farms to irrigate dairy shed effluent to land.

Dairy shed effluent is created from the milking shed and platform on clean down and is a combination of water and effluent. As such it is an excellent natural liquid fertiliser. It contains nitrogen, phosphorus, potassium, magnesium, sulphur and trace elements essential for grass growth. Normally a farm would have to pay for these nutrients to be applied to pasture.

However, pasture can only use so much effluent at a time. It's important for the person in charge of the system to match the irrigation depth to the capability of the pasture to utilise the nutrients. Over-application of effluent can result in:

- killing pasture – especially where effluent has 'ponded' on top of the soil;
- pollution of groundwater – by seeping too deep into the soil;
- pollution of nearby streams and rivers – where it runs off paddocks into waterways;
- ineffective use of nutrients - by seeping past the root zone before the plant can utilise it.

There are five outcomes following an inspection that determine a dairy farm's performance against the conditions of their consent.

1. Score of 1 means the farm is *Full compliance* – complies with all conditions of its consent;
2. Score of 2 means the farm has *Minor non-compliance* – has not complied with 'administrative' conditions of its consent;
3. Score of 5 means the farm has some *Marginal non-compliance* – there is evidence that an incident is likely, or has happened, but the environmental effect does not warrant any more action than advice and education;
4. Score of 7 means that the farm has some *Non-compliance* – e.g. more than the consented number of cows;
5. Score of 10 means the farm has *Significant non-compliance* – requires re-inspection and may lead to an investigation and punitive measures being taken.

1.1.1 Discharge Consent Inspections

During 2016/17, 941 dairy shed effluent discharge consent inspections were completed. Of these, 651 were fully compliant, 249 were graded 2 or 5, 2 farms were found to have non-compliance with cow numbers and 39 were graded 10 for significant non-compliance.

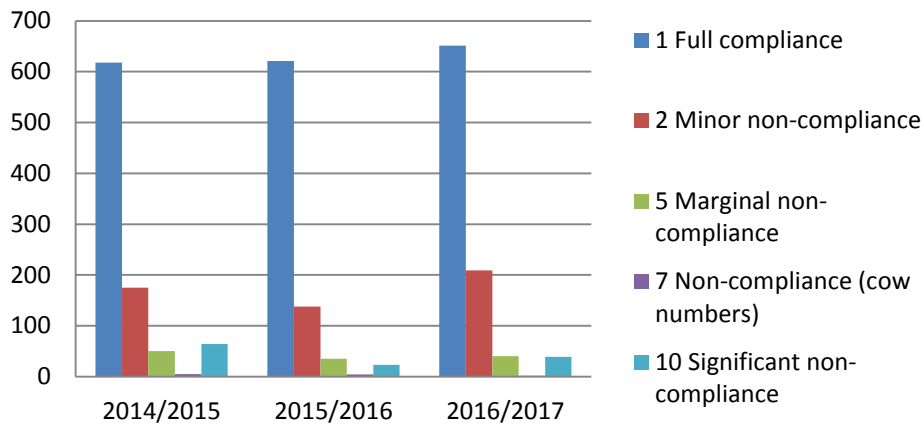


Figure 1 - Comparison of discharge consent inspections over the last three years.

If an inspection results in a grade of 10 (significant non-compliance), a re-inspection is conducted. Twenty re-inspections were completed for the year.

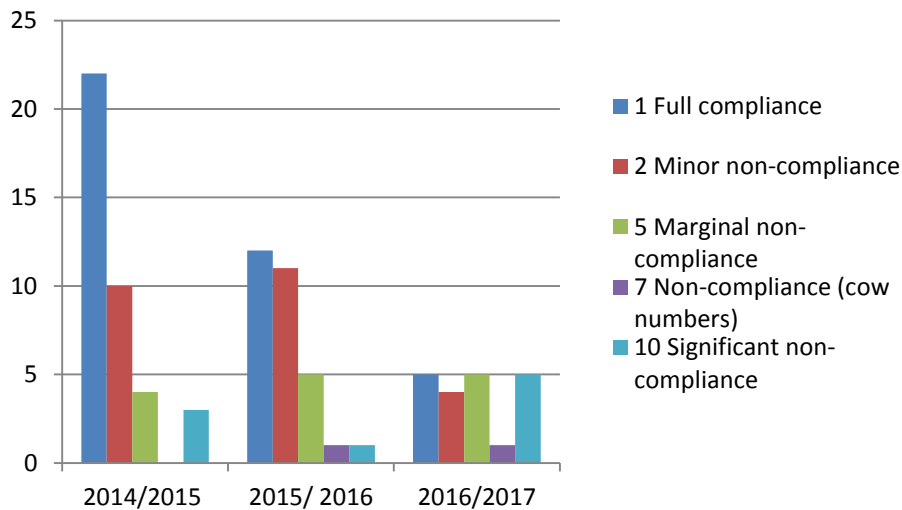


Figure 2 - Comparison of discharge consent re-inspections over three years.

1.1.2 Aerial Inspections

In 2016/17 Environment Southland postponed the aerial monitoring programme, consequently no aerial inspections were conducted in the 2016/17 year.

1.1.3 Wintering Pad Inspections

Compliance staff undertook inspections of the purpose-built sites used to feed and house cows over the winter period.

1.2 Groundwater Quality Sampling for Dairy

Groundwater is the water found underground in the cracks and spaces in soil, sand and rock. It is stored and moves slowly through geological formations of sand and rock called aquifers. Water in our aquifers is recharged (topped up) by snow melt, interaction with surface water and water filtering through from the ground above. Water carrying contaminants through the soil profile can impact on the aquifer water quality, which can subsequently impact on the suitability of the water supply for certain uses.

Groundwater sampling is a tool used to monitor compliance with dairy effluent discharge consents. The purpose is to look for measurable changes over time in the groundwater quality in the areas where effluent is applied.

Water samples are collected from shallow bores near the effluent disposal field and are then analysed for a number of parameters including nitrate and *E.coli* levels. The results from a three to five-year period can give a reasonable indication of the effects effluent application is having on groundwater. If deterioration is noted, further investigation will be required to confirm that the change is associated with dairy effluent irrigation.

By April 2017, there were 295 discharge consents where the effects of dairy effluent discharge on groundwater are required to be monitored. This sampling typically occurs twice a year, in November and April.

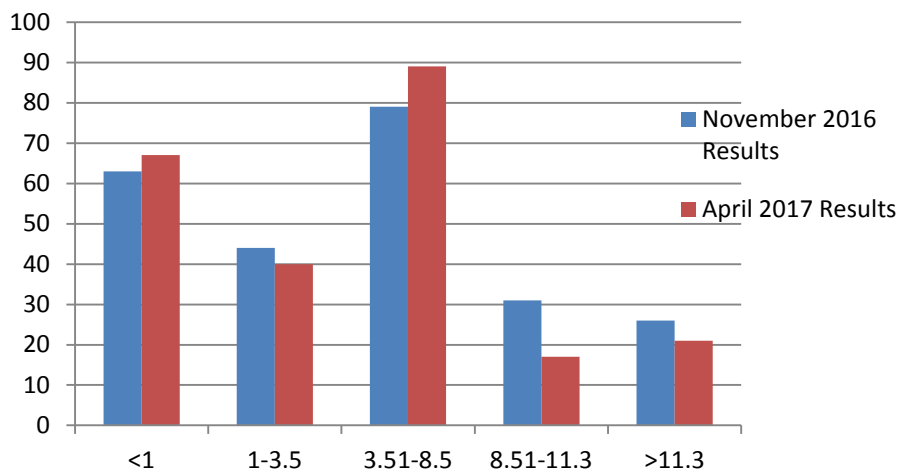


Figure 3 - Dairy groundwater monitoring nitrate results for November 2016 and April 2017 (measured as g/m³).

1.3 Irrigation Water Consents

During the 2016/17 irrigation season there were 126 current irrigation consents. Of these, 104 were for abstractions from groundwater, and 22 were for abstractions from surface water.

Each consent holder has a daily abstraction limit, and is required to submit records of the volume of water taken each day to show compliance with their consent conditions. Consent holders must also contact Environment Southland with their intention to commence irrigation, or report a NIL return if there has been no irrigation for the season.

Irrigation in Southland is predominantly to encourage pasture growth, with 97 of the irrigation consents identified as being for pasture irrigation, 20 for crop irrigation, one for horticulture and eight for recreational use.

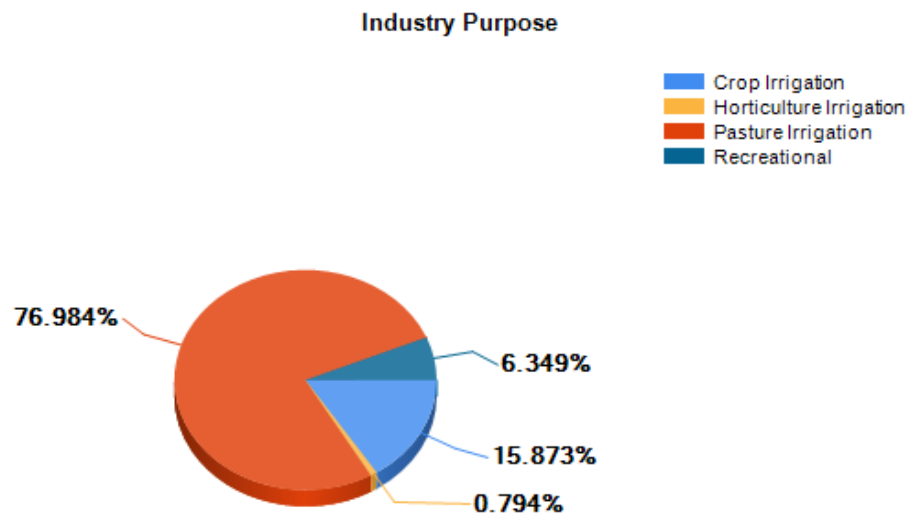


Figure 4 - Irrigation use in Southland.

Water Meters

The accuracy and installation of water meters used to measure the volume of water abstracted is very important to ensure that consent holders are compliant with their consents and national regulations. To achieve this all meters must be correctly installed and once in place the ability of the meter to provide accurate data is confirmed.

Irrigation New Zealand has developed a Code of Practice for the measurement of water abstraction and established an accreditation scheme, "Blue Tick", to help manage this. Once approved it is accepted that companies and individuals that gain accreditation are deemed competent in one or all of the three disciplines covered in the code of practice.

Environment Southland has adopted the Blue Tick accreditation scheme to help standardise the quality of the operators:

- installing meters;
- verifying the accuracy of the meters;
- managing the data being transferred electronically to Environment Southland.

Currently seven companies have gained accreditation for the installation of meters, five companies have gained accreditation for the verification of meters and nine have accreditation for data management.

2.0 Industrial Audits – Major Industries

2.1 Meat Industry

2.1.1 Alliance Group Limited

Alliance Group Limited operates three meat processing plants in Southland, at Lorneville, Makarewa and Mataka.

What do we look at?

The consents issued for the Alliance Group's plants permit the discharge of treated wastewater into water and onto land. Alliance also holds resource consents for discharges to air, as well as land use and water abstraction.

Compliance was assessed against the current resource consents.



Upstream Sampling Site, Alliance Group Mataka Plant.

Lorneville

Consents

Alliance Group Limited holds 12 resource consents for the Lorneville plant. The primary consents are as follows:

- discharge of treated wastewater to the Makarewa River;
- discharge of treated wastewater to land;
- discharge of wastewater and stockyards solids to land;
- discharge of contaminants to air;
- discharge of stormwater into an open drain;
- take surface water from the Makarewa and Oreti Rivers.

Complaints and self-reported incidents			
Four complaints were received alleging odours from the Lorneville Plant. Two complaints resulted in the issuing of a formal warning and two were not confirmed.	14/15	15/16	16/17
	An ammonia spill was also reported during the 2016/17 period.		

Air Discharge Consent Performance	
As reported above, two odour complaints resulted in significant breaches of the air discharge consents.	16/17

Consent Performance			
All other consents were fully compliant for this period. The quality of the treated wastewater from the Lorneville plant met the consent requirements for the 2016/17 period. Water abstraction rates were also compliant during this period.	14/15	15/16	16/17

Makarewa

Consents

Alliance Group Limited holds seven resource consents for the Makarewa plant, as follows:

- discharge wastewater to the Makarewa River;
- discharge treated wastewater to land;
- discharge stormwater to the Makarewa River;
- take groundwater for meat processing;
- take surface water for meat processing;
- discharge contaminants to land from a landfill;
- to plant trees on the bank of the Makarewa River.

Complaints and self-reported incidents			
There were no complaints or self-reported incidents relating to the Makarewa Plant for the 2016/17 period.	14/15	15/16	16/17

Consent performance summary			
The discharge of treated wastewater to the Makarewa River occurred sporadically over the 2016/17 period. All sample results were within the consented limits for this period.	14/15	15/16	16/17
All other monitoring conditions were met for the 2016/17 period.			

Mataura

Consents – Mataura

Alliance Group Limited holds seven resource consents for the Mataura plant, as follows:

- discharge of contaminants, including odour, to air;
- discharge of treated meatworks wastewater to the Mataura River;
- discharge of stormwater to the Mataura River;
- discharge of cooling water to the Mataura River;
- discharge of wastewater treatment solids to land;
- take water from a water race fed by the Mataura River for meat processing;
- take surface water for pelt and hide processing.

Complaints and self-reported incidents			
<p>Three complaints were received for the 2016/17 period; one regarding the spreading of solids to saturated soils and two alleging odours from the Mataura Plant. The first incident was confirmed, resulting in an Education Letter to Alliance Group Limited. The odour complaints were not confirmed during investigations, however, odour diaries were distributed in response to the second odour complaint. Few were returned and no further complaints were received.</p>	14/15	15/16	16/17

Consent performance summary			
<p>The effluent discharge from the Mataura Plant was within consented limits for the 2016/17 period, with the exception of a minor BOD exceedance in June 2017. Ecological monitoring of the Mataura River in March 2017 also indicated that the discharge was not having any significant adverse effects.</p>	14/15	15/16	16/17
<p>Wastewater treatment solids and soil analyses were within consented limits for the 2016/17 period.</p> <p>The sulphur content of the coal burned onsite did not exceed the consented limit of 0.6% for the 2016/17 period</p>			

Consent performance summary			
Particulate matter concentrations (PM ₁₀) were measured for the purpose of the ambient air monitoring report. The 24-hour average concentrations of PM ₁₀ measured over the monitoring period were well below the National Environmental Standard for Air Quality.			

2.1.2 Blue Sky Meats (NZ) Limited

Consents
<p>Blue Sky Meats (NZ) Limited holds four resource consents for the purpose of meat processing at its Morton Mains plant. Three of these are consents to discharge.</p> <p>They are:</p> <ul style="list-style-type: none"> • to discharge contaminants to the ground through the operation of offal pits; • to discharge wastewater to land via a spray irrigator; • to discharge contaminants to air.

Blue Sky Meats Limited operates a meat processing plant at Morton Mains, near Woodlands.

What do we look at?

The three consents Blue Sky Meats holds to discharge contaminants to the environment.

Compliance is assessed against these resource consents.

Complaints and self-reported incidents			
Two Incidents were received during the reporting period. One reported by a member of the public and one a self-notification. Both were confirmed to have breached consent conditions. One of the incidents is currently before the courts.	14/15	15/16	16/17

Consent performance			
Environment Southland conducts routine consent monitoring once every two months. During these inspections no significant issues were identified with the water quality in the receiving waters, however, on one occasion effluent ponding resulted in non-compliance.			
The two reported incidents also resulted in consent	14/15	15/16	16/17

Consent performance			
non-compliance.			
In early 2017 construction of the large effluent storage pond was completed and the pond was commissioned. This will help the company manage its effluent disposal.			

2.1.3 South Pacific Meats Limited

Consents			
South Pacific Meats Limited holds three resource consents for the purpose of meat processing at its Awarua plant.			
They are:			
<ul style="list-style-type: none"> • to discharge stormwater containing contaminants into the New River estuary; • to discharge contaminants to air from the rendering plant, wastewater treatment plant, boiler and associated processes; • to discharge meat works effluent sludge to land. 			

South Pacific Meats Limited operates a meat processing plant at Awarua, approximately 10km south of Invercargill.

What do we look at?

South Pacific Meats has three consents to discharge. Compliance is assessed against these resource consents.

Complaints and self-reported incidents			
No complaints relating to discharges from the South Pacific Meats Plant were confirmed during the 2016/17 period.	14/15	15/16	16/17

Consent performance			
The South Pacific Meats plant was technically non-compliant with the provision of monitoring data in accordance with its reporting requirements.	14/15	15/16	16/17

2.1.4 Prime Range Meats Limited

Consents

Prime Range Meats Limited holds one resource consent for the purpose of meat processing at its Invercargill plant.

The consent is:

- to discharge contaminants, including odour, to air from a meat works and rendering plant, and from a wastewater treatment system.

Prime Range Meats Limited is a meat processing and rendering plant on the banks of the Waikiwi Stream in Invercargill.

What do we look at?

Prime Range Meats operated under one consent related to the discharge of contaminants to air, during this reporting period. Compliance is assessed against this resource consent.

Complaints and self-reported incidents			
There were no complaints confirmed from the Prime Range Meats plant for the 2016/17 season.	14/15	15/16	16/17

Consent performance			
Prime Range Meats was fully compliant with all of its monitoring and reporting requirements.	14/15	15/16	16/17

2.2 Dairy Industry

2.2.1 Fonterra Co-operative Group Limited

Consents
<p>Fonterra holds 15 resource consents related to dairy processing at its Edendale Plant.</p> <p>These include:</p> <ul style="list-style-type: none"> • to discharge wastewater to land; • to take groundwater from bores; • to discharge wastewater and stormwater to water; • to discharge contaminants to air; • to discharge sludge to land; • to discharge whey by-product to land.

Fonterra Co-operative Group Limited operates a dairy processing facility in the Edendale township.

What do we look at?

Fonterra holds 11 consents to take water, and to discharge. Compliance is assessed against these resource consents.

Complaints and self-reported incidents

Environment Southland recorded two self-reported incidents and two publicly reported incidents relating to the Edendale operation. No adverse environmental effects were observed from any of the four incidents.

Complaints and self-reported incidents			
<p>The incidents related to:</p> <ul style="list-style-type: none"> ➤ one accidental discharge of nitric acid. The discharge was contained and resulted in no discharge of contaminants to water; ➤ a milk silo collapse. This was a significant incident but all of the milk was contained and discharged to land; ➤ one reported over-application of effluent to land. This was investigated and found to not breach consent conditions; ➤ one reported incident of the presence of a bad odour in the Edendale township. This was investigated but the source was not identified. <p>On each occasion Fonterra responded to the</p>	14/15	15/16	16/17

Complaints and self-reported incidents			
incidents and resolved any issues that arose, addressing these in a timely manner.			

Consent performance			
<p>Generally, there was a good level of compliance in relation to the operation of the boiler plant. There was a minor breach of the steam load consent limit. The cause was quickly identified and the problem was rectified. A systems issue resulted in the non-supply of stack monitoring data.</p> <p>There were some minor exceedances for the groundwater take. These were attributed to a combination of systems or equipment errors, and natural factors. The daily abstraction limits were complied with.</p> <p>Monitoring and reporting requirements relating to the discharge of sludge were fully compliant.</p> <p>A technical non-compliance was observed for the discharge of wastewater to land. This was due to specific information not being supplied in the required Management Plan and Monitoring Manual.</p> <p>There was generally good compliance for the discharge of wastewater to the Maitava River. Minor exceedances that occurred were immediately investigated and reported, and any issues were resolved.</p>			
	14/15	15/16	16/17

2.2.2 Open Country Dairy (NZ) Limited

Consents

Open Country Dairy holds two resource consents related to dairy processing at its Awarua Plant. They are:

- to discharge condensate and stormwater to a farm drain;
- to discharge contaminants to the air from the milk processing plant and boiler.

Open Country Dairy (NZ) Limited operates a milk processing plant at Awarua, approximately 10km south of Invercargill.

What do we look at?

Open Country Dairy (NZ) Limited has two consents related to discharge. Compliance is assessed against these resource consents.

Complaints and self-reported incidents			
No complaints relating to discharges from the Open Country Dairy Plant were confirmed during the 2016/17 period.	14/15	15/16	16/17

Consent performance			
Open Country Dairy was fully compliant with the conditions of its air discharge consent.			
There was an exceedance identified in relation to the discharge of stormwater from the site. The limit for total suspended solids was exceeded on two out of four occasions.	14/15	15/16	16/17

2.3 Energy Industry

2.3.1 Pioneer Energy Limited

Consents			
Pioneer Energy Limited holds 18 resource consents for its Monowai Station.			
These include:			
<ul style="list-style-type: none"> • to take surface water; • to use, maintain and alter an existing earth dam; • to discharge water to water; • to discharge contaminants to land; • to dam and divert. 			

The power generation station at Monowai, owned by Pioneer Energy Limited, is a community owned electricity provider and wholesaler. The station was owned by Trust Power until 2003, when it was sold to Pioneer, which is owned by the Alexandra-based charitable trust, The Central Lakes Trust. The company operates 13 power stations in Central Otago and Southland.

What do we look at?

Pioneer Energy Limited has 18 consents to operate its power generation scheme. The consents are for the ongoing operation and maintenance of the Monowai Power Station. They control the take, use and discharge of water for power generation, while maintaining minimum flows in all of the existing waterways. Compliance is assessed against these consents.

Complaints and self-reported incidents			
No complaints relating to Pioneer Energy Limited were confirmed during the 2016/17 reporting period.	14/15	15/16	16/17

Consent performance			
Pioneer has achieved compliance with the Operating Guidelines for the management of Lake Monowai.			
The consented guideline flow regime was complied with at all times over the reporting period.	14/15	15/16	16/17
Compliance was achieved with all other consented monitoring and reporting requirements for the 2016/17 reporting period.			

2.3.2 Meridian Energy Limited

Consents

Meridian Energy Limited holds 35 resource consents related to the operation of Manapouri Power Scheme.

They include:

- to dam and divert the waters for hydro-electric power generation;
- to take and use water for hydro-electric production, and for domestic supplies;
- to discharge treated sewage to land;
- to discharge stormwater to land;
- to carry out bed disturbance;
- to discharge contaminants to air;
- to discharge water and contaminants to the coastal marine area;
- to occupy Lake Manapouri and coastal marine area with wharves.

Meridian Energy Limited operates the largest hydroelectric power station in New Zealand at West Arm, Lake Manapouri, within the Fiordland National Park. Electricity is generated using water stored in Lakes Te Anau and Manapouri. The stored water from the lakes is controlled using structures at the outlet of Lake Te Anau and the Lower Waiau River. The water used to generate electricity is discharged through two tunnels to Deep Cove, Doubtful Sound. Compliance performance was assessed against the current resource consents.

What do we look at?

Meridian Energy Limited has 35 consents to operate its power generation scheme. Consent performance is assessed against these consents, and is based on an assessment of compliance for the period 1 January 2016 to 31 December 2016.

Complaints and self-reported incidents			
No environmental incidents or complaints were received by Environment Southland for the 2016 reporting period	2014	2015	2016

Consent performance summary

Compliance was achieved with consented limits and was also achieved with consented monitoring and reporting requirements.

Consent performance			
Generally, there was a good level of compliance demonstrated during the 2016 reporting period.	2014	2015	2016
There were some minor exceedances reported. These related to the operation of the Manapouri lake control structure under different river			

Consent performance			
conditions, and the management of flows through the Te Anau lake control structure.			



Manapouri Power Station.

2.4 Manufacturing Industry

2.4.1 New Zealand Aluminium Smelters Limited

Consents
<p>NZ Aluminium Smelters Limited holds six discharge and water take consents that require inspecting, as follows:</p> <ul style="list-style-type: none"> • discharge contaminants to land where they may enter coastal water; • discharge treated sewage to land; • discharge treated effluent to the Coastal Marine Area (CMA); • discharge of water including contaminants to the CMA; • discharge of contaminants to air from the aluminium smelter and related activities; • take and use groundwater for industrial supply.

New Zealand Aluminium Smelters Limited (NZAS) is located on the Tiwai Peninsula at Awarua, and produces some of the purest aluminium in the world.

What do we look at?

NZAS holds eight resource consents, six of which have monitoring and inspection requirements. Compliance during the 2016/17 period was assessed against these resource consent conditions.

Complaints and self-reported incidents	14/15	15/16	16/17
<p>Two complaints were received: one relating to black dust blowing from the NZAS site and the other related to dust originating from a ship berthed at the port. Neither was confirmed by ES staff, however, NZAS staff responded immediately, and no further complaints were received on either occasion.</p>			

Consent performance	14/15	15/16	16/17
<p>NZAS remained compliant with consent limits during the 2016/17 period, with the following exceptions which were responded to appropriately.</p> <p>An exceedance of the alumina particulate emissions limit from a dust collector was reported by NZAS in March 2017. Re-tests of the dust collector discharge following replacement damaged filter bags, resulted in compliant levels and no further issues were reported.</p> <p>An exceedance of the TSS limit for cathode effluent was reported for samples collected in October 2016. This was responded to appropriately and</p>			

Consent performance			
preventative measures have been put in place to avoid future exceedances.			
NZAS continually provided notifications to ES during the 2016/17 period, regarding routine maintenance that may have resulted in concerns from members of the public.			



Aerial view of New Zealand Aluminium Smelters.

2.4.2 Dongwha New Zealand Limited

Consents
<p>Dongwha New Zealand Limited holds 11 resource consents. Of these, six are discharge consents, as follows:</p> <ul style="list-style-type: none"> • discharge of contaminants to air from fibreboard processing, including the treatment of wastewater; • discharge of effluent and treatment pond seepage to land; • discharge of untreated stormwater and treated wastewater to water; • discharge of stormwater to land; • discharge from a tile drain to a watercourse; • discharge of contaminants to air from trialling PMDI and MDI as MDF Panel Resins.

Dongwha New Zealand Limited is a mixed density fibreboard (MDF) manufacturing plant, located south of the Matura township.

What do we look at?

The five consents that Dongwha hold, to discharge of contaminants to the environment. Compliance is assessed against these.

Complaints and self-reported incidents			
Two complaints were received relating to the Dongwha Plant; one alleging dust from the plant and a second regarding excessive smoke. These incidents were not confirmed by ES staff, however, investigations were completed by Dongwha, and no further complaints were received.	14/15	15/16	16/17

Consent performance			
Dongwha NZ Limited was compliant with all monitored consent conditions for the 2016/17 period. To date, Dongwha has not exercised the consent that allows the discharge of treated wastewater to the Mataura River; all wastewater has been irrigated to land. All formaldehyde and particulate emissions remained significantly lower than consented limits. No issues were raised during the two PMDI resin trials completed in 2017.	14/15	15/16	16/17



Dongwha site office.

2.5 Fertiliser Industry

2.5.1 Ballance Agri-Nutrients Limited

Consents

Ballance Agri-Nutrients Limited holds three resource consents for its fertiliser manufacturing plant at Awarua. They are:

- to discharge treated and untreated stormwater from the site to an unnamed drain;
- to take groundwater from two bores;
- to discharge contaminants to air.

Ballance Agri-Nutrients Limited operates a fertiliser manufacturing facility at Awarua, about 10 km south of Invercargill.

What do we look at?

Ballance Agri-Nutrients Limited holds three consents. Compliance is assessed against these resource consents.

Complaints and self-reported incidents			
One incident was reported where a truck and trailer unit had an accident and spilt urea on the road. The road and roadside verges were cleaned up with no fertiliser observed to have entered the neighbouring waterways. This incident was not related to the Ballance consents.	14/15	15/16	16/17

Consent performance			
Ballance Agri-Nutrients was fully compliant with all of their consent conditions for the 2016/17 reporting period.	14/15	15/16	16/17

2.5.2 Ravensdown Fertiliser Co-operative Limited

Consents

Ravensdown Fertiliser Co-operative Limited holds two resource consents for the purpose of operating a limestone quarry at its Dipton site. They are:

- to discharge treated stormwater to water;
- to discharge contaminants to air.

The company holds one resource consent for its Balfour site, which is:

- to discharge stormwater from a limestone quarry.

Ravensdown Fertiliser Co-operative Limited operates two limestone quarries in Southland, one at Dipton and the other at Balfour.

What do we look at?

Ravensdown operates two sites and holds three consents to discharge. Compliance is assessed against these resource consents.

Complaints and self-reported incidents

One incident was reported where urea had spilt from the transportation of fertiliser from the ship to the storage facility. The spilt material was cleaned up. This incident was not related to the Ravensdown consents.

14/15

15/16

16/17

Consent performance

The Ravensdown sites at Dipton and Balfour were fully compliant with all of their consent conditions for the 2016/17 reporting period.

14/15

15/16

16/17

2.6 Mining Industry

2.6.1 Solid Energy New Zealand Limited/Greenbriar Limited

The Ohai, New Vale and Goodwin Mines were operated by Solid Energy New Zealand Limited in 2016 and early 2017. In April 2017, all resource consents relating to these mines were transferred to Greenbriar Limited, with the sale and purchase of the New Vale and Ohai Mines. Although it is no longer operational, Solid Energy New Zealand Limited also holds resource consents for the Maitua Briquetting Plant.

What do we look at?

The consents issued for the Solid Energy/Greenbriar mines authorise the discharge of treated mine water and stormwater to water. Consents are also held for the discharge of contaminants to air and ash to land at these mine sites. Compliance was assessed against the current resource consents.

Ohai Mine Site	<p>Consents</p> <p>Twelve resource consents are held relating to mining activities at the Ohai mine site. The primary consents include:</p> <ul style="list-style-type: none">• discharge of contaminants to air from mining, screening and stockpiling of coal;• discharge of treated wastewater to water;• discharge of surface and groundwater;• discharge of solid waste to land;• take surface water for a mining operation;• take water and discharge water from the Ohai Number 6 mine lake into the Morley Stream.
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Complaints and self-reported incidents			
There were no complaints or self-reported incidents relating to the Ohai Mine for the 2016/17 period	14/15	15/16	16/17

Consent performance summary			
<p>The Ohai Mine was substantially compliant for the 2016/17 period, with the following exceptions.</p> <p>Stormwater sampling is to occur when specific rainfall conditions are met; sampling did not occur on all appropriate occasions resulting in non-compliance. Those samples collected showed no adverse effects on Morley Stream.</p> <p>The Benthic Invertebrate Survey for 2017 lacked the required detail, resulting in the late submission of an amended report.</p> <p>TSS was omitted from receiving water samples in February 2017.</p>	14/15	15/16	16/17

**Goodwin
and
New Vale
Mine Sites**

Consents
<p>Seven consents are held relating to mining activities at the Goodwin and New Vale mine sites, as follows:</p> <ul style="list-style-type: none"> • discharge of treated water to the Hedgehope Stream (Goodwin); • discharge of treated water to the Hedgehope Stream (New Vale); • take groundwater and surface water for mining (Goodwin); • take groundwater and surface water for mining (New Vale); • discharge of contaminants to air; • discharge of ash to land; • discharge of pelt processing solids to land.

During 2016/17, Solid Energy New Zealand Limited/Greenbriar Limited operated two mines in the Waimumu area; New Vale Mine and Goodwin Mine.

Complaints and self-reported incidents			
<p>New Vale Mine received one complaint regarding dust emissions from the site. The complaint was confirmed and the Consent Holder responded immediately. No further complaints were received.</p>	14/15	15/16	16/17

Consent performance			
Consent requirements were met for the 2016/17 period; with the exception of the above dust complaint. No issues were raised with the discharge or water take consents for this period, and a proactive management approach was maintained onsite.	14/15	15/16	16/17



Mining Operations, New Vale Mine, Waimumu.

<div style="border: 1px solid black; border-radius: 15px; padding: 10px; background-color: #D9E1F2;"> <p>Mataura Sites</p> </div>	<p>Consents</p> <p>Solid Energy NZ Limited holds four resource consents relating to the Briquetting Plant and former mine pits:</p> <ul style="list-style-type: none"> • discharge of contaminants to air, including boiler emissions; • discharge of wash water and boiler blow-down water to a former mine pit; • discharge water from mine pits to the Mataura River; • take surface water from the Mataura Mine pit.
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The Mataura briquette plant ceased operations at the end of September 2013. However, Solid Energy remains committed to following its environmental monitoring programme and continues to supply results to Environment Southland as required by its consents.

Complaints and self-reported incidents			
There were no complaints or self-reported incidents relating to the Mataura Briquetting Plant for the 2016/17 period.	14/15	15/16	16/17

Consent performance			
<p>The Mataura Briquetting Plant was in a “care and maintenance” phase, requiring minimal monitoring for the 2016/17 period. Discharge from the mine pit was monitored monthly; all results up until April 2017 were compliant. However, due to staff changes with the sale of the New Vale and Ohai Mines, sampling was overlooked in May and June 2017, resulting in non-compliance with consent conditions.</p> <p>Although the plant was not operational, the supply of water abstraction data was to continue. Abstraction rates were compliant, although data was supplied late.</p>	14/15	15/16	16/17

2.6.2 Bathurst Resources Limited

Consents
<p>Bathurst Resources Limited holds 15 consents for mining-related activities. The primary consents include:</p> <ul style="list-style-type: none"> • take groundwater and surface water for dewatering; • discharge of stormwater to water; • discharge of treated site water to water; • discharge of ash from industrial operations, mixed with overburden, to land; • discharge of contaminants to air; • disturb the bed and divert the flow of a tributary.

Bathurst Resources Limited operates a coal mine in Nightcaps, Western Southland. During the 2016/17 period, two sites were being mined; the Coaldale Mine and the Black Diamond Mine.

What do we look at?

The Bathurst Resources Limited consents allow the discharge of treated site water to the Wairio Stream. The mine also holds consents for water abstraction, discharge of contaminants to air, and discharge of ash to land. Compliance was assessed against current resource consent conditions.

Complaints and self-reported incidents			
No self-reported incidents or public complaints were received for the 2016/17 reporting period.	14/15	15/16	16/17

Consent performance			
Bathurst Resources Ltd was substantially compliant with consent conditions for discharges to land, air and water. A turbidity limit exceedance was reported for surface water samples collected in	14/15	15/16	16/17

Consent performance			
<p>April 2017. A retrospective investigation was requested by ES, which revealed that no discharge was occurring on this day.</p> <p>Full compliance was achieved for two of the three water take consents. However, there were ongoing issues with a flow meter for the Black Diamond water take. This resulted in continual non-compliance with consent limits and conditions. Remedial action was undertaken and there were no adverse environmental effects as a result of the malfunctions.</p> <p>A diversion of the unnamed tributary of the Wairio Stream was completed in 2017, with all consent conditions met and no significant issues arising.</p> <p>No issues were raised during the site inspection completed in June 2017.</p>			



Active mine pit, Bathurst Resources, Nightcaps.

2.7 Sawmill Industry

There are four sawmill companies in Southland that hold resource consents for discharge purposes. They are at Otautau, Winton, Ryal Bush and Tuatapere. Their compliance performance during 2016/17 was assessed against their current resource consents.

What do we look at?

Environment Southland inspects each site and audits the water sampling results to assess for sediment runoff and the concentrations of timber treatment metals which can be toxic to aquatic life in high concentrations.

2.7.1 Craigpine Timber Limited

Consents
<p>Craigpine Timber Limited holds two discharge consents that require inspection. They are:</p> <ul style="list-style-type: none"> to discharge contaminants to the air from timber processing activities; to discharge timber yard stormwater and condensate to water.

Craigpine Timber Limited operates a sawmilling plant at Winton.

What do we look at?

Craigpine Timber Limited has two consents to discharge to water and air. Compliance is assessed against these resource consents.

Complaints and self-reported incidents	14/15	15/16	16/17
<p>Two complaints were received during the 2016/17 reporting period.</p> <p>One was discolouration due to the discharge of stormwater. As a result of heavy rain, stormwater originating from the sawmill site was discovered discharging to the Winton Stream. A formal warning was issued for this incident. Remedial work has been initiated to address this problem.</p> <p>The other was reported by a member of the public concerned that effluent was being discharged from a truck to the Winton Stream. It was found that the truck was abstracting water to spread on site to suppress dust.</p>			

Consent performance for discharge to water	
Craigpine breached the standards set out in its stormwater discharge consent. This was from an incident involving the discharge of stormwater from the site which resulted in the discolouration of the Winton Stream (<i>see incidents</i>).	16/17

Consent performance for Air discharge consent			
The required boiler emissions report for the 2016/17 reporting period showed full compliance.	14/15	15/16	16/17

2.7.2 Findlater Sawmilling

Consents
Findlater Sawmilling holds two consents related to its sawmilling operation. They are: <ul style="list-style-type: none"> to discharge stormwater to a wetland from a sawmilling operation; to take groundwater for a sawmilling operation.

The Findlater Sawmilling Limited operates a sawmilling plant at Tussock Creek.

What do we look at?

Findlater Sawmilling Limited has two consents related to its operation. Compliance is assessed against these resource consents.

Complaints and self-reported incidents			
No complaints relating to discharges from the Findlater Sawmilling Plant were confirmed during the 2016/17 period.	14/15	15/16	16/17

Consent performance			
Findlater Sawmilling was fully compliant with all of its consent conditions for the 2016/17 reporting period.	14/15	15/16	16/17

2.7.3 Lindsay & Dixon Limited

Consents

Lindsay & Dixon Limited holds one discharge consent related to its sawmilling operation.

This is:

- to discharge stormwater to water from a sawmilling and timber processing site.

Lindsay & Dixon Limited operate a sawmilling plant at Tuatapere.

What we look at

Lindsay & Dixon Limited holds one consent related to discharge to water. Compliance is assessed against this resource consent.

Complaints and self-reported incidents

No complaints relating to discharges from Lindsay and Dixon Limited were confirmed during the 2016/17 period.	14/15	15/16	16/17
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Consent performance

Monitoring results were fully compliant with the conditions of the consent.	14/15	15/16	16/17
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3.0 Sewage Treatment Systems

3.1 Invercargill City Council

Consents

The Invercargill City Council holds eight discharge consents relating to its sewage treatment plants. These include consents to:

- discharge treated wastewater to an estuary;
- discharge treated wastewater to coastal water;
- discharge contaminants to land;
- discharge biosolids to land;
- discharge stormwater and wastewater to land.

The Invercargill City Council (ICC) holds resource consents for discharging treated sewage at three locations: Clifton, Omaui and Bluff. The Council also discharges biosolids (dried sludges from the sewerage system), waste, leachate, and filter backwash water to land, at Invercargill, Bluff, and Branxholme. Compliance is assessed against these resource consents.

What do we look at?

As part of the consent requirements for the ICC, the quantity of effluent being discharged and the quality of the effluent and its receiving waters are assessed.

Complaints and self-reported incidents

Two complaints were received for odour in the vicinity of the Clifton sewage treatment plant. The source of the odour on each occasion could not be confirmed.

Consent performance summary

Bluff Wastewater			
All monitoring results were fully compliant with the conditions of the consent.	14/15	15/16	16/17

Invercargill Wastewater			
All monitoring results were fully compliant with the conditions of the consent.	14/15	15/16	16/17

Omaui Wastewater			
The operation of the treatment system was fully compliant with the conditions of the consent.	14/15	15/16	16/17

Biosolids to land, Station Road			
There was no discharge of biosolids to the disposal area during the reporting period.	14/15	15/16	16/17

Biosolids to land, Christies Track			
There was no discharge of biosolids to the disposal area during the reporting period. All monitoring and reporting requirements were fully compliant with the conditions of the consent.	14/15	15/16	16/17

Branxholme filter backwash water to land and water			
All monitoring and reporting requirements were fully compliant with the conditions of the consent.	14/15	15/16	16/17

Stormwater

Complaints and self-reported incidents

A total of 11 incidents were received by Environment Southland:

- seven incidents related to the discharge of hydrocarbons being discharged to the Invercargill City Council stormwater system;
- seven incidents related to blockages in the sewerage system causing sewage to overflow and some to enter the stormwater system;
- one incident was related to paint being spilt into the Invercargill stormwater system.

On all occasions staff from the Invercargill city council investigated and took appropriate action to mitigate the issues associated with the discharges.

Consent performance summary

The Invercargill City Council has five consents authorising the discharge of stormwater to open drains and waterways from five different catchments. These consents were granted in 2011 for five years. The Invercargill City Council has applied for a new consent which will allow for the discharge of stormwater from all catchments. The consent has been issued but is currently subject to appeal.

Water Abstraction

The Invercargill City Council holds a resource consent to abstract water from the Oreti River. The water is treated at the Branxholme Water Treatment Plant for supply to Invercargill and Bluff.

Complaints and Self-reported Incidents

There were no complaints or self-reported incidents for the 2016/17 period.

Consent Performance Summary

All water abstraction limits were adhered to during the 2016/17 period.

3.2 Southland District Council

Consents

The Southland District Council holds 35 discharge consents, including consents to:

- discharge processed wastewater to land;
- discharge processed wastewater to water;
- discharge processed wastewater to coastal water.

The Southland District Council (SDC) holds resource consents for the purpose of treating and discharging sewage at 19 locations within the Southland region. The compliance performance during 2016/17 was assessed against current resource consents.

What do we look at?

The quantity of water being discharged and quality of the effluent and receiving waters are assessed.

The quantity of water discharged is referred to as “discharge flows”. Discharge flows are the amount of sewage and wastewater either entering or leaving the sewage treatment system. All exceedances of discharge flows correspond to periods of high rainfall. This indicates that there is stormwater entering the sewage systems. Therefore, although the discharge flows have increased, the discharge is likely to be more dilute than normal due to mixing with rainwater.

Complaints and self-reported incidents

A total of 20 incidents were received regarding the Southland District Council (SDC).

Of these, 12 were received from the public related to odour originating from the Te Anau oxidation pond over a three-week period from February – March 2017. Environment Southland confirmed an objectionable odour beyond the property boundary on two separate occasions during this period. The objectionable odour breached the air discharge permit for the Te Anau wastewater treatment. Southland District Council investigated and undertook appropriate actions to resolve the issue.

Two complaints were received from the public relating to two separate non-consented discharges to the coastal marine area. The incidents were confirmed, investigated and appropriate action taken.

One complaint was received from the public relating to a discharge from a public toilet. This incident was confirmed, investigated and appropriate action taken.

The remaining five complaints were also received from the public and were related to permitted activities. No breaches of plans or rules were established.

Consent performance summary

Balfour			
Full compliance was achieved with the effluent quality and impact on the receiving environment.	14/15	15/16	16/17
Browns			
Full compliance was achieved with the effluent quality and impact on the receiving environment.	14/15	15/16	16/17
Curio Bay			
Consent commenced 31 March 2017. Full compliance was achieved with the effluent quality and impact on the receiving environment.			16/17
Edendale/Wyndham			
Full compliance was achieved with the effluent quality and impact on the receiving environment. The maximum discharge flow limit was achieved.	14/15	15/16	16/17
Gorge Road			
There were no breaches of consented limits for the reporting period. Compliance was achieved with all consented limits and monitoring requirements.	14/15	15/16	16/17
Lumsden			
Compliance was achieved with consented effluent quality and reporting requirements for the 2016/17 period. However, there were 27 breaches of the discharge flow limits.	14/15	15/16	16/17

Manapouri			
Compliance was achieved with consented effluent quality limits and reporting requirements for the 2016/17 period. Compliance was also achieved with consented flow limits.	14/15	15/16	16/17

Monowai			
The consented discharge faecal coliform and total suspended solids criteria were exceeded on one monitoring occasion for the 2016/17 reporting period. Compliance was achieved with all other consented limits and monitoring requirements.	14/15	15/16	16/17

Nightcaps			
Compliance was achieved with consented effluent quality limits for the 2016/17 reporting period. However, there were seven breaches of the daily discharge flow limits under consent 99141, which was current till 28 February 2017. The new consent which commenced 1 March 2017 has a monthly average daily flow which was complied with for March – June 2017. On one sample occasion two required parameters were not tested for and the repeat sample was taken under flow conditions that were too high.	14/15	15/16	16/17

Ohai			
Compliance was achieved with all discharge consent limits, however the downstream dissolved oxygen limit was breached on two occasions.	14/15	15/16	16/17

Otautau			
Compliance was achieved with consented effluent quality limits and reporting requirements for the 2016/17 period.	14/15	15/16	16/17

Riversdale			
From 1 July 2016 – 4 October 2016 resource consent 98223 was operational. During this period the Dissolved oxygen and ammoniacal nitrogen concentrations in the receiving waters, 50m downstream of the discharge, breached the consent limits on one occasion. The daily limit for discharge flow into the system was also exceeded on 29 occasions from July – August 2016. The new resource consent commenced 5 October 2016 and contains trigger values for receiving water and groundwater monitoring. The limit for the discharge flow into the system is an annual average flow and has been complied with. Environment Southland was not	14/15	15/16	16/17

Riversdale			
notified in advance, as required, of a high flow discharge from the system to the waterway. Notification was instead received after the discharge had commenced.			
Riverton Rocks			
Compliance was achieved with consented effluent quality limits and reporting requirements for the 2016/17 period. Compliance was also achieved with consented flow limits.	14/15	15/16	16/17
Riverton Township			
Compliance was achieved with consented effluent quality limits and reporting requirements for the 2016/17 period. However, the consented daily discharge limit was breached seven times.	14/15	15/16	16/17
Stewart Island			
The DIN limit was exceeded on one occasion. Compliance was achieved with the remaining consented limits and monitoring requirements for the 2016/17 reporting period.	14/15	15/16	16/17
Te Anau – discharge to land and water			
Compliance was achieved with the discharge to water consented limits and monitoring requirements for the 2016/17 reporting period. However, the consented monthly discharge flow limit was breached two times.	14/15	15/16	16/17
Te Anau – Discharge to Air			
The discharge to air permit was confirmed to be breached during a two-week period from 21 February 2017 to 6 March 2017 due to an objectionable odour beyond the property boundary.			16/17
Tokonui			
Compliance was achieved with consented effluent quality limits and reporting requirements for the 2016/17 period. However, the maximum daily wastewater flow limit was exceeded on 13 occasions.	14/15	15/16	16/17
Tuatapere			
Compliance was achieved with consented effluent quality limits and reporting requirements for the 2016/17 period. Compliance was also achieved with consented flow limits.	14/15	15/16	16/17

Winton			
Compliance was achieved with consented effluent quality limits and reporting requirements for the 2016/17 period.	14/15	15/16	16/17

Water Abstraction

The Southland District Council holds 23 resource consents to abstract groundwater and surface water for community and rural water supply. This includes emergency takes to supplement urban supply.

Complaints and Self-reported Incidents

There were no complaints or self-reported incidents relating to the SDC water take consents for the 2016/17 period.

Consent Performance Summary

The Ohai/Nightcaps/Wairio and Otautau water supply regularly breached the daily water abstraction limit. A new consent was issued on 22 August 2017, which increased the daily water abstraction limit.

The Otautau water supply breached the daily water abstraction limit on 26 occasions during March – May 2017.

All other water abstraction limits were adhered to during the 2016/17 period.

The emergency supplies were not exercised during this period.

Stormwater

Complaints and self-reported incidents

No complaints relating to stormwater were received by Environment Southland for the 2016/17 period.

Consent performance summary

The Southland District Council is currently applying for consents to discharge stormwater from a number of small townships around Southland.

3.3 Gore District Council

Consents

The Gore District Council holds four resource consents relating to sewage treatment, as follows:

- discharge of treated wastewater from the Mataura Township;
- discharge of treated wastewater from the Gore Township;
- discharge of treated wastewater at Waikaka;
- discharge of contaminants to air from the Gore Wastewater Treatment System.

The Gore District Council (GDC) holds four resource consents relating to its sewage treatment facilities. The compliance performance during 2016/17 was assessed against the current resource consents.

What do we look at?

As part of the consent requirements for Gore District Council, the quantity of water being discharged and the quality of the wastewater and receiving waters are assessed.

Complaints and self-reported incidents

There were no complaints or self-reported incidents relating to the GDC sewage consents for the 2016/17 period.

Consent performance summary

Gore			
<p>The TSS and <i>E. coli</i> rolling percentiles for the pond discharge were exceeded on several occasions during the 2016/17 period. However, individual sample limits were not exceeded for these parameters. Calculation issues were identified and rectified during this period, and these exceedances were worked through with Environment Southland. Minor exceedances of the consented discharge flow rates were recorded on two occasions; not likely to have resulted in any adverse environmental effects.</p> <p>GDC is currently undertaking a significant desludging project of its primary oxidation ponds; project to be completed by December 2017.</p> <p>No issues were identified during Macroinvertebrate and Periphyton surveys in 2016/17.</p>	14/15	15/16	16/17

Mataura			
All consent requirements were met for the 2016/17 period. Discharge and receiving water limits were met, and sampling was completed at the required frequency.	14/15	15/16	16/17

Waikaka			
All discharge and receiving water monitoring was compliant for the 2016/17 period. However, discharge flow rates were exceeded on several occasions during dry weather conditions. Discharge rates were reduced in response, and the dry periods with exceedances lasted no more than two days.	14/15	15/16	16/17

Stormwater Networks

Consents
The Gore District Council holds four stormwater resource consents, as follows:
<ul style="list-style-type: none"> • discharge of stormwater to water for Gore Township; • discharge of stormwater to water for Mataura Township; • discharge of stormwater to water for Pukerau and Waikaka Townships; • discharge of water from dewatering of a construction area in Gore Township.

The Gore District Council (GDC) holds three resource consents to discharge stormwater. These consents cover the Gore, Mataura and Pukerau/Waikaka townships. An additional consent was granted in September 2016 for the dewatering of a construction area in Gore; this was not exercised during the 2016/17 period.

Complaints and self-reported incidents

There were no complaints or self-reported incidents relating to the GDC stormwater consents for the 2016/17 period.

Consent performance summary

During the 2016/17 period, stormwater sampling was completed on five occasions across the four stormwater networks. This included both dry and wet weather sampling. Some sites were unable to be accessed due to 'dry' conditions or health and safety issues. These sites are to be reviewed in the Proposed Monitoring Plan for 2017-2022.

E. coli exceedances were reported on 12 occasions during the 2016/17 period, from sites across all of the stormwater networks. Where required, investigations were completed and reported to Environment Southland. The appropriate authorities were notified in response to these exceedances. Agricultural runoff was likely to be an influence at several sites.

Water Abstraction

The Gore District Council holds 10 resource consents to abstract groundwater and surface water for industrial and community water supply. This includes emergency takes to supplement urban supply.

Complaints and Self-reported Incidents

There were no complaints or self-reported incidents relating to the GDC water take consents for the 2016/17 period.

Consent Performance Summary

All water abstraction limits were adhered to during the 2016/17 period. Conservation measures were implemented when required and supplementary water takes at Jacobstown, Coopers Well and Waikaka Stream were not exercised during this period.

4.0 Quarrying

4.1 Gravel Extraction

The Resource Management Act 1991 and/or a rule in a Council plan require that a resource consent is required to disturb the bed of a river.

Environment Southland currently has 127 land use consents to extract gravel from Southland rivers. During the 2016/17 financial year Environment Southland granted 15 new consents/consent renewals to extract up to a total of 700,258 m³ of gravel.

Environment Southland issues courtesy letters to each consent holder when applications are granted to advise them of their responsibilities for complying with consent condition requirements.

The number of applications received to extract gravel has been reducing over the last few years, with the majority of applicants being industrial. It appears they are establishing long-term sites, rather than creating individual sites for each contract.



Gravel extraction on the Aparima River.

5.0 Landfills

5.1 S J Timpany Cleanfill

Consents

S J Timpany holds two resource consents, however only the second consent requires inspection. They are:

- to discharge cleanfill and solid waste to land;
- to discharge contaminants from burning green waste to air.

S J Timpany operates a cleanfill and a limited-scope landfill accepting solid waste from the demolition of housing and commercial buildings, asbestos and some contaminated soils at its Otatara site. The site also has a holding pad which allows for sample testing of contaminated soils and encapsulation of contaminants prior to discharge.

What do we look at?

S J Timpany has two consents to discharge. Compliance is assessed against the current resource consent for discharge of solid waste to land with groundwater sampling conducted to assess potential contamination.

Complaints and self-reported incidents

Two complaints were received. Neither complaint was confirmed to have breached consent conditions.	14/15	15/16	16/17
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Consent performance

S J Timpany Contracting was fully compliant with all conditions for the 2016/17 reporting period.	14/15	15/16	16/17
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Cleanfill and limited scope landfill site.

5.2 AB Lime Landfill

Consents

AB Lime Limited holds six resource consents, as follows:

- discharge of solid waste onto or into land;
- discharge of contaminants to air from a landfill;
- discharge of stormwater to a tributary of the Lochiel Stream;
- take 40 cubic metres of groundwater;
- take 500 cubic metres of surface water;
- dam and divert surface water.

AB Lime Limited operates an agricultural fertiliser and lime business, and a Class A landfill business approximately 4km east of the Winton Township. This section focuses predominantly on the landfill.

What do we look at?

AB Lime holds six consents to operate the landfill. Compliance was assessed against current resource consent conditions.

Complaints and self-reported incidents

Complaints and self-reported incidents			
No complaints were received relating to the landfill or limeworks during the 2016/17 period.	14/15	15/16	16/17

Consent performance summary

Note: not all data for the 2016/17 period had been reviewed at the time of writing this report. This included the annual air discharge report.

Consent performance

Some trigger level exceedances were reported for groundwater and surface water quality monitoring during the 2016/17 period. These were investigated and no further action was deemed necessary. Close monitoring of these levels is to continue. Overall, compliance was achieved for the period and AB Lime continued to be proactive in communicating with Environment Southland.

Although the air discharge report is not included in this summary, ongoing issues were reported with regard to the gas flare operation, i.e. low methane, low flow and non-compliant minimum combustion temperatures. Major work was completed during the 2016/17 period, and this issue will continue to be worked through with a variety of stakeholders.

A peer review inspection was completed in April 2017 with AECOM Consulting Services Ltd, Environment Southland and AB Lime Ltd. Minor issues were identified and an action plan was subsequently submitted by AB Lime Ltd. Area 14 of the landfill was signed off for use in 2017.

14/15	15/16	16/17
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View across areas 13 and 14 of the active landfill, AB Lime.

6.0 Coastal Marine Area

6.1 South Port and New Zealand Aluminium Smelter Limited's Coastal Plan Agreements

The two main port facilities in Southland operate out of Bluff.



South Port services and manages Southland's import and export industries including aluminium, timber, fisheries, dairy, meat, wood chips, stock food, cement, alumina, fertiliser and petroleum products.

New Zealand Aluminium Smelters (NZAS) services and manages the import and export operations of aluminium and aluminium based product based on the Tiwai Peninsula.

Activities on these sites are managed by means of individual agreements. The agreements describe a series of systems which each party has agreed to, ensuring the management of port activities are compliant with the Resource Management Act 1991.

Any issues are addressed at individual annual meetings.

Incidents reported

South Port

- Three incidents were reported that may have been linked to activities at the port.
- Discolouration in the water as a result of heavy morning rain washing sediment from the log storage yards. A major upgrade of the storage area is scheduled to commence in October 2017.

- Discharge of a small volume of liquid ammonia from a cool store to Bluff Harbour. Impact was minor, but South Port was required to review procedures for dealing with similar incidents.
- Reclamation of land in the area of the Island Harbour. This was investigated, no issues could be confirmed.

NZAS Wharf

Environment Southland received one report of dust originating from a vessel berthed at the NZAS wharf facility. This was not confirmed and has been reported earlier in this report.

6.2 Whitebait Stands

Environment Southland is responsible for whitebait stands under the Regional Coastal Plan, and undertakes an annual inspection of these each year. Huts associated with the stands are controlled by the Southland District Council, while the Department of Conservation controls the fishing of whitebait.

The Coastal Plan has set the maximum number of whitebait stands allowed in Southland at those that were occupied at 15 February 1997. Any new whitebait stands are prohibited.

In 2014/15 Environment Southland began removing illegal stands that had been identified from the previous year's inspections. During the inspections, additional illegal stands were located and notification was left attached to these stands for the owners to contact Environment Southland.

Whitebait stands were inspected for compliance with common conditions such as each stand displaying a unique number, being a certain length and in good repair. Inspections are completed midseason, which allows owners additional time for repairs. As in previous years there was a high level of compliance with these consents.

Although most of the whitebait stands in Southland are permanent structures, stands in Fiordland have to be removed each season. These whitebait stands were also inspected at the end of the season to ensure the conditions were being met.

6.3 Coastal Surface Water Activities in Fiordland

Coastal permits are required for undertaking commercial surface water activities in Fiordland. Environment Southland is responsible for ensuring compliance with coastal permits issued under the Regional Coastal Plan for Southland and Resource Management Act 1991.

Compliance is assessed largely by monitoring activity logs submitted by consent holders. A high level of compliance was achieved by most consent holders during the 2016/17 period. Completed logs were provided on time and nil returns were reported when applicable. However, a small number of operators were non-compliant, having not supplied logs, submitted incomplete logs or providing

logs outside of the required timeframes. Letters were sent to these operators, and formal action may be taken if continual non-compliance occurs.

In April 2017, an on-water patrol was conducted to assess compliance from consent holders, recreational users and commercial users of the marine environment. This patrol was completed in lower Fiordland, and included assessments from Doubtful Sound to Chalky Inlet. This was a multi-agency expedition with Environment Southland Compliance, Environment Southland Biosecurity, Ministry for Primary Industries and the Department of Conservation.

A total of nine coastal permits were checked during this trip, as well as several other non-commercial vessels and moorings/buoys. All commercial vessels were operating in compliance with resource consent conditions. Hull inspections were completed by Environment Southland Biosecurity, and Education was provided from various agencies on hunting permits, fishing regulations and clean vessel passes.

No complaints relating to surface water activities were received for the 2016/17 period.



Southern Winds Vessel during the April 2017 patrol, Supper Cove, Dusky Sound.

7.0 Crown Agencies

7.1 Department of Conservation

Consents
DOC holds resource consents for the following purposes:
<ul style="list-style-type: none"> Coastal: 11 Discharge: 17 Land Use: 13 Water: 9

The Department of Conservation (DOC) holds 50 current resource consents, however, a number of these consents do not have inspection or monitoring requirements. Note: 1080 discharges no longer require resource consent.

What do we look at?

A total of 13 DOC resource consents require routine monitoring or inspections. These consents relate to water takes and wastewater discharges associated with the DOC huts on the Milford, Kepler and Routeburn Tracks. Additional huts and facilities are also located at Martins Bay, Anchor Island and West Arm, Lake Manapouri.

Complaints and self-reported incidents

Complaints and self-reported incidents			
There were no complaints or self-reported incidents relating to the Milford, Kepler or Routeburn Tracks, for the 2016/17 period.	14/15	15/16	16/17

Consent performance summary

Consent performance			
<ul style="list-style-type: none"> Clinton Hut <i>Full compliance</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> Mintaro Hut <i>Full compliance</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> Dumpling Hut <i>Full compliance</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> Sandfly Point Hut <i>Full compliance</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> Luxmore Hut <i>Full compliance</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> Iris Burn Hut <i>Full compliance</i> 	14/15	15/16	16/17

Consent performance			
<ul style="list-style-type: none"> • Moturau Hut <i>Client inspections and report did not meet consent conditions</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> • Lake McKenzie Hut <i>Client inspections and report did not meet consent conditions</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> • Howden Hut <i>Full compliance</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> • Martins Bay Hut <i>Late supply of data</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> • Anchor Island <i>Data not supplied</i> 	14/15	15/16	16/17
<ul style="list-style-type: none"> • West Arm, Manapouri <i>Late supply of data</i> 	14/15	15/16	16/17



Luxmore Hut, Kepler Track.

Part B

Incident Response

8.0 Incidents

Compliance officers respond to reports of pollution that come in via our 24-hour pollution hotline (0800 76 88 45).

This year there was a slight increase of incidents reported to the compliance team. In the 2016/17 year there were 714 incidents reported and investigated.

The costs involved in attending and investigating an incident are charged where an offending party can be identified. Unfortunately, many of the incidents attended do not identify the offending party. In these cases where mitigation action has to be taken to cease an environmental effect such as the removal of litter, rubbish and dead stock from waterways, the cost of such action is met by the ratepayer.

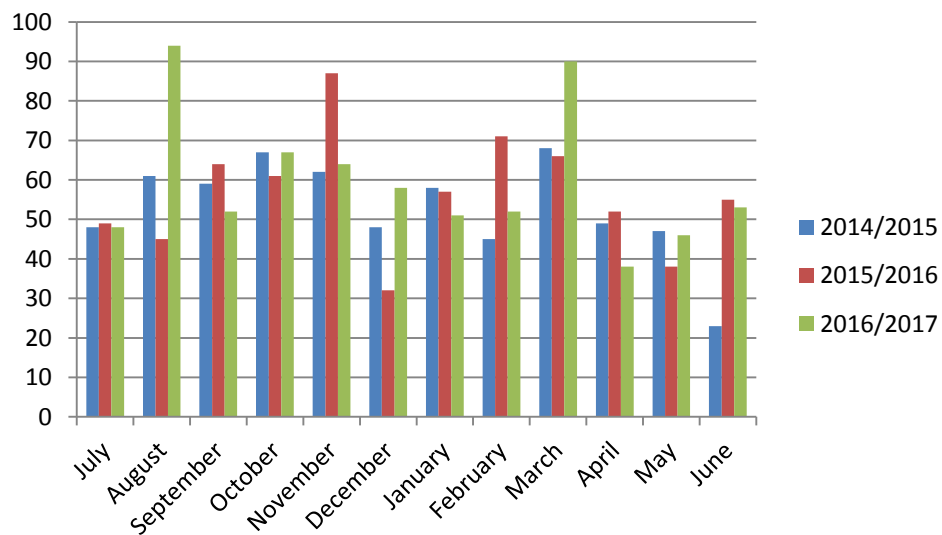


Figure 5 - Reported incidents per month compared over three years.

The variety of incidents reported to the compliance team can be extremely wide and covers all manner of environmental incidents. A lot of incidents are reasonably rudimentary and can be completed in a short time frame. There are some incidents that can start major investigations that have taken months to arrive at a resolution.

As can be seen in the above graph it is hard to predict, over the past three years, when the monthly incident numbers will increase. In the 2016/17 year there have been two spikes in August and March.

In the month of August incidents related to Air issues rose from 10 in August 2015, to 38 in August 2016, whereas there was an increase in Land, Water and Air for reported incidents in March.

Priority of Incidents

Incidents are assigned a priority from one hour, for urgent matters, to six months for matters with low environmental impacts. Priorities are determined by taking into account several factors including potential harm to the environment, the need for evidence collection and the receiving environment.

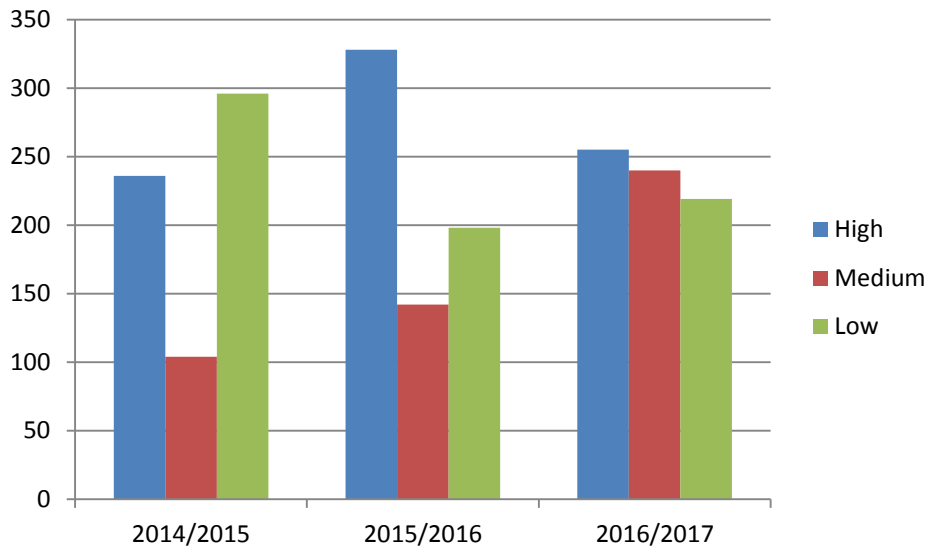


Figure 6 - Priority response category compared to previous years.

Smoke, dust and odour complaints normally have a high priority due to the immediacy of the issue that can dissipate very quickly. On some occasions the evidence in such complaints might not be present by the time a compliance officer arrives on site.

Part C

Enforcement

9.0 Enforcement

For many, enforcement is more closely associated with the police and law courts, however other organisations, including Environment Southland, have statutory roles and responsibilities with regard to the enforcement of specific laws.

The RMA provides a number of tools to deal with non-compliance actions. These can be categorised into two outcomes: directive actions and punitive actions.

Directive actions include letters of direction, abatement notices and enforcement orders. These actions carry no fines and are designed to direct people towards compliance.

Punitive actions are matters such as formal warnings, infringements and prosecutions. These actions carry a reprimanding component and, in the case of infringement and prosecution, may result in a fine.

In most cases, where an inspection of an incident occurs, the costs associated can be recovered.

9.1 Warnings and Abatement Notices

Environment Southland's compliance team takes a measured approach when responding to offences by using a number of enforcement tools available to the council such as letters of direction, formal warnings and abatement notices.

A letter of direction is used to moderate situation with a co-operative, motivated party. It is designed to prevent further breaches, or to remedy or mitigate the effects of non-compliance. Normally the letter will give timelines and what action should be taken or ceased.

A formal warning is a written warning to a person or company that has committed an offence. No further action will be taken in respect of the breach, but it will form part of the history of non-compliance. Normally a formal warning will be given in a minor to moderate incident.

An abatement notice requires an offender to comply with the notice within a specified timeframe. This means that when an activity has been identified as being, or likely to be, harmful for the environment. The abatement notice requires that the activity is stopped before it starts or is stopped from continuing or has someone take action to correct the harmful effects.

Abatement notices are issued to people or organisations that breach a rule in the Act, any regulation, or a condition of resource consent. Unlike enforcement orders they are issued by compliance officers and do not require an application to be made to the Environment Court.

During the 2016/17 year, the compliance team issued three letters of direction, 28 formal warnings and 25 abatement notices.

Infringement Notices Issued

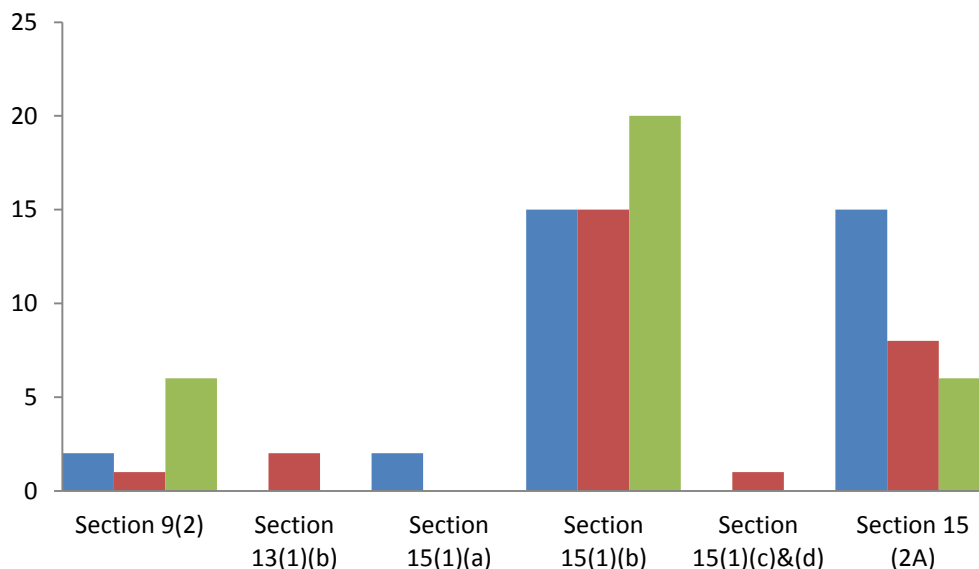


Figure 7 – Reasons for infringement notices issued comparing the last three years

Section 9	Restrictions on use of land
Section 13	Restriction on certain uses of beds of lakes and rivers
Section 15 (1)(a)	Discharge of contaminant or water into water
Section 15(1)(b)	Discharge of contaminant onto or into land in circumstances which may result in that contaminant entering water
Section 15 (1)(c) & (d)	Contaminant from any industrial or trade premises into air; or Contaminant from any industrial or trade premises onto or into land
Section 15(2A)	Discharge of a contaminant into the air, or into or onto land, from a place or any other source, whether moveable or not, in a manner that contravenes a regional rule

9.2 Infringement Notices

An infringement notice can be issued to an individual or company that has committed an RMA offence. The infringement fine is \$300, \$500, \$750 or \$1000 and, if not paid in certain timeframes, will be sent to the Ministry of Justice for fine collection (where further fees are likely to be added).

Infringements can be appealed. Information on how to make an appeal is found on the back of each infringement notice, and can be explained by staff.

There were 32 infringement notices issued for the 2016/17 year, a slight increase on the previous year.

9.3 Prosecutions

Environment Southland will only proceed with a prosecution if satisfied that the test for prosecution is met.

This means:

- the evidence which can be presented in court is sufficient to provide a reasonable prospect of conviction – the evidential test; and
- prosecution is required in the public interest – the public interest test.

Each aspect of the test must be separately considered and satisfied before a decision to take prosecution action is made.

The council must analyse and evaluate all of the evidence and information in a thorough and critical manner and receive legal opinions before proceeding.

The matters that were prosecuted and completed in the 2016/17 year were:

Southland Regional Council vs Hardegger Trustees Ltd and Adolf Hardegger

Mr Hardegger and the Trust were charged with three charges, each relating to works associated with works completed in the creation of a dairy runoff block.

The works included unlawfully excavating or otherwise disturbing the bed of the Oreti River and diverting its course and erecting unauthorised culverts disturbing the bed and the straightening of Starvation Creek.

The Oreti River is subject to the Oreti River Conservation Order and Starvation Creek is recognised as breeding grounds for several types of fish, including threatened and nationally vulnerable species.

Mr Hardegger received a fine of \$8,312 per charge (\$24,639).

Hardegger Trustees Limited received a fine of \$3,562.50 per charge (\$10,687.50).

Southland Regional Council vs Te WaeWae Dairies Ltd

Te WaeWae Dairies Limited was charged with over-applying dairy shed effluent from the irrigation system while irrigating and discharging the dairy shed effluent into an unnamed waterway crossing under Te Waewae Road.

Further investigation revealed that there was a second set of irrigation pods surrounded by a significant amount of ponding. This ponded effluent entered a waterway through a subsurface drain.

Officers were then informed that there was another discharge from a further set of irrigation pods that was discharging into another subsurface drainage system and running in the opposite direction and into a different waterway.

Te WaeWae Dairies Limited was charged with \$26,250 per charge (\$52,500).

Southland Regional Council vs Klass Wasslander

Mr Wasslander was charged three charges relating to two discharges of silage leachate and one charge of discharge of dairy shed effluent to land in circumstances that the contaminant may get to water.

The silage leachate was identified as being extremely noxious and the discharges were found in the vicinity of Duck Creek, which discharges into the New River Estuary

Mr Wasslander was fined \$20,000 on each charge (\$60,000).

9.4 Enforcement Orders

An enforcement order is another way of getting someone to comply with the Resource Management Act. It is similar in some respects to an abatement notice, in that it is used to get someone to start or stop doing something.

However, it differs from an abatement notice in that anybody (not just the council) can apply for an enforcement order against somebody else. These are issued by the Environment Court rather than the council.

Enforcement orders offer more options than an abatement notice, including the ability to recover clean-up costs in avoiding, remedying or mitigating any adverse effect on the environment. The court may also order restoration of a natural or physical resource. If the order is not complied with, council may go ahead and comply on the respondent's behalf (and recover the cost of doing so).

If a problem or the options to resolve it are complex, enforcement proceedings provide a court-supervised procedure for bringing about a conclusion, and if problems are encountered during the implementation of the solution, direction can be sought from the court.

The following enforcement orders were applied for and granted during the 2016/2017 year:

Hardegger Trustees Ltd & Adolf Hardegger

To provide a report on, and complete the correction of, unauthorised river diversions and to remove an unauthorised river culvert.

Joannes Coppus

To provide an independent engineer's report on a leaking effluent pond and carry out repairs to ensure it is structurally sound.

Klass Wasslander

To provide an independent report of issues on farm that either directly or indirectly contributes to poor environmental outcomes. The enforcement order also required Mr Wasslander to provide a timeline and to address each issue identified.

Gladvale Farms Limited

To provide an independent report of issues on farm that either directly or indirectly contributes to poor environmental outcomes. The enforcement order also required Gladvale Farms to provide a timeline and to address each issue identified.

McDowall Rural Services Limited, Dipton Transport Co Limited, Gordon McDowall and Kent McDowall

To provide a report on the removal of odorous animal bi-products from a truck yard and casement of associated leachate and truck wash discharges. To also remove the contaminant from the truck yard to an approved facility.

Glossary

Ammoniacal Nitrogen (NH ₄ N)	Ammoniacal nitrogen is rarely found at high levels in natural waters. Its presence is an excellent means of detecting pollution. It is a major component in urine excreted by mammals. High levels of ammoniacal nitrogen can potentially be toxic to aquatic life.
ANZECC	The Australia New Zealand Environmental Conservation Council. This organisation develops guidelines that are applicable to Australian and New Zealand situations.
Black Water	Wastewater containing human faeces and urine, generated from toilets.
cBOD ₅	Carbonaceous Biochemical Oxygen Demand – a measure of the ability of contaminants to adversely remove oxygen from water
CCA	Copper (Cu), Chromium (Cr) and Arsenic (As) are the usual metals analysed for when considering the timber treatment process. High levels of metals can become toxic to aquatic life.
Clarity	The distance that can be seen through the water. The higher the clarity the greater the visibility in the water.
Chl <i>a</i>	Chlorophyll <i>a</i> – the pigment in plant cells which captures light energy for photosynthesis.
DAF Unit	Dissolved Air Flotation unit. This is an effluent treatment system whereby air is pumped into the effluent under pressure. When the air is discharged into the tank containing effluent, it returns to atmospheric pressure, the dissolved air comes out of suspension and forms bubbles on the particulate matter. These bubbles then float to the surface to be removed as sludge.
Dissolved Inorganic Nitrogen (DIN)	Nitrate + Nitrite Nitrogen plus Ammoniacal Nitrogen.
Dissolved Oxygen (DO)	Oxygen is important to sustain life. DO is the amount of oxygen dissolved in water.

DRP	Dissolved Reactive Phosphorus – a form of phosphorus that is readily available to plants to sustain growth. High levels of Phosphorus and Nitrogen in receiving waters can promote the growth of nuisance weeds in waterways.
<i>E. coli</i>	Escherichia coli - <i>E.coli</i> is a bacterium that is commonly found in the lower intestine of warm-blooded organisms. They are a subset of the Faecal Coliform group and are regarded as an indicator of faecal contamination and therefore the presence of pathogenic (harmful) bacteria.
EC	Electrical Conductivity – the ability of water to conduct electricity. This gives a conservative measure of the mineral content of water. Generally, the greater the conductivity of the water, the greater the mineral content of the water.
Formaldehyde	An organic compound that is a by-product of the resins used to bind MDF particles together.
Faecal Coliforms (FC)	Organisms that are present in the gut and faeces of warm-blooded animals and are used as indicators of the presence of pathogenic organisms.
g/m ³	Grams of material in 1 cubic metre of water – a measure of concentration in a liquid or gas.
Grey Water	Wastewater that is generated from domestic activities like clothes washing, dishwashing and bathing.
Heavy Metals	A set of elements that exhibit metallic properties that typically have high atomic weights and that can damage living things and tend to accumulate in the food chain.
Loading	The quantity of contaminants discharged over a set period of time.
LTP	Long-term Plan. This is a document projecting Council activities, as required by the Local Government Act 2002.
mg/kg	Unit to measure concentration in a solid (equivalent to ppm (parts per million) or g/m ³ the unit used to measure concentrations in liquids).
MPN	Most Probable Number – a statistical estimate of the mean density of bacteria in a water sample.
Nitrate-N	An oxidised form of Nitrogen – Nitrate Nitrogen is soluble and is therefore readily available to plant life to sustain growth.
PAH	Polycyclic Aromatic Hydrocarbons – a class of over 100 different organic molecules composed of only carbon and hydrogen. PAHs are

flat molecules with each carbon having three adjacent carbon atoms similar to the structure of graphite. The USEPA has listed 16 of these as priority chemicals due to their potential health effects.

PM ₁₀	
Particulate Matter	The unburnt material that is commonly discharged with the gas or smoke from a fire or boiler. This is measured as PM ₁₀ , meaning a particle size of 10 micrometres or less.
Sewage	A mixture of black and grey water.
Stormwater system	A system of pipes and drains that carry rain and snowmelt from street surfaces, roofs and other paved areas. The stormwater system leads directly to waterways, without being treated.
Total Filterable Particulate Matter	Quantity of particles collected on a filter.
Total Nitrogen (TN)	An important element in the growth of plant material. It is required for protein formation and consequently animals have a significant N content. Total Nitrogen is a measure of all nitrogen present
Total Phosphorus (TP)	Phosphorus is an important element in the growth of plant material. Total Phosphorus is a measure of all phosphorus present, including all forms of phosphorous whether it is tightly bound to particulate matter or potentially available to plant life.
Total Suspended Solids (TSS)	Very small particles that have the potential to affect the colour and clarity of a water body and can potentially settle out onto a streambed, smothering aquatic life in the waterways.
Turbidity	Turbidity is a laboratory measurement to determine the clarity of the water. The higher the result the cloudier the water.
µg/m ³	A measure of concentration in a liquid or gas. Micrograms of material in 1 cubic metre of water. 1 gram = 1,000,000 micrograms.
USEPA	US Environmental Protection Agency

Compliance Team (as at October 2017)



Simon Mapp
Compliance Manager

Technical team



Graeme McKenzie
*Team Leader Compliance
Technical*



Kathryn McLachlan
Compliance Technical Officer



Jason ten Hoorn Boer
Compliance Technical Officer

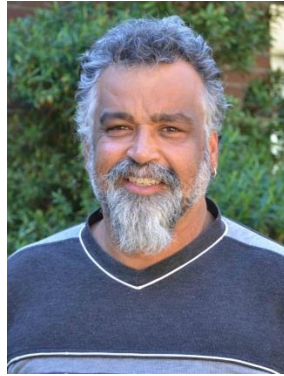


Ruth Williamson
Compliance Technical Officer

Monitoring and enforcement team



Melissa Washbourne
Team Leader Compliance



Rob Bird
Compliance Officer



Michelle Te Maro
Compliance Officer



Mike Trent
Compliance Officer



Alex Erceg
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Administration



Ange Willis
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