

**Statement of evidence in support of oral submission to Otago Regional Council re – QLDC Wastewater Network Consent Application by James Michael Bohm, 30th October 2019.**

*Brief background note on submitter*, I have worked in education in a variety of settings and roles throughout my working life. I retired to live in Wanaka 10 years ago. During the past 18 months I have been chair of the Upper Clutha Shaping our Future Water Taskforce. However please note my submission is entirely my own and is not connected in any way to Shaping our Future.

The statement of evidence of Ulrich Glasner of 18th October 2019 states that “public education and awareness is the key to reducing fats and foreign objects from entering the wastewater network and to ensuring that the types of trees that could damage the wastewater network are not planted close to pipework.” The statement of evidence of Peter Hansby of 18th October 2019 states that “If we cannot get the community to understand these issues ***and change their behaviours*** (my italics) we cannot reduce the risks to our sewers.”

I believe these statements show improvements on the earlier position outlined by QLDC in their original consent application. I think it’s especially noteworthy that Mr Hansby now recognises the need for *behaviour change* by members of our communities.

However I consider that the modifications to QLDC’s consent application won’t be enough. There are still gaps in QLDC’s approach to lessening what they acknowledge as the principle causes of wastewater blockages causing overflows into freshwater.

Before a consent is granted I therefore submit that condition 10 of the consent should be updated with the following further conditions:

1. QLDC should be required to demonstrate that they have or will seek the resources, abilities and skills to do the job in a way that gets the right results.
2. QLDC should implement an evaluation process based on objective science to demonstrate the success or otherwise of their strategies to bring about behaviour change.
3. The consent issuer should be able to require QLDC to modify or improve its Education/Communication Plan if the evaluation process has shown that the programme is not working as well as it should.
4. Information on such findings as in 2 and 3 above should be easily publicly accessible on QLDC and ORC websites.
5. Consent duration should not exceed 10 years. The consent issuer should be able to decline consent renewal if the education and communication plan has failed.
6. QLDC should be required to initiate efforts towards changing undesirable corporate behaviours that contribute to wastewater overflows into freshwater such as by marketing products like wipes that block wastewater networks.

1. The consent applicant should be required to demonstrate that it has or will seek the resources, abilities and skills for its education and communications plan to succeed.

Education and Communication by QLDC aimed at discouraging people from putting what Ulrich Glasner calls FOGS (fats and foreign objects) into the wastewater seems to me to have been rather poor until now. Two examples: Firstly I can find nothing about it on QLDC web-site, at least not easily, nor on QLDC's Twitter and Facebook during 2019. Yet QLDC claims to have begun this programme more than two years ago. In contrast many water authorities overseas have good, easily accessible resources for this online. Examples:

<https://www.scottishwater.co.uk/en/Your-Home/Sewage-Pollution/What-is-Sewage-Pollution>

<https://www.thameswater.co.uk/be-water-smart/Bin-it/whats-blocking-the-drains>

<https://thinkbeforeyouflush.org/international-links/>

Secondly QLDC's current "education and communications program" appears, other than the recent appointment of a trade waste officer, to consist mainly of a few leaflets and media releases that nobody has easy access to. QLDC has developed seemingly not much else. So I find it hard to take QLDC seriously when it claims in its updated consent application that it "recognises the importance of continuing its education and raising awareness to the community and visitors to the District." I ask, what is this "education" that it proposes to continue? Will it be just a regurgitation of more of the same ineffectual approaches from the recent past?

Changing people's deeply ingrained habits and behaviour is HARD WORK. And the behaviours we are discussing here are *really* challenging. This may be because they are often done in private - nobody else can see us doing them. Also, marketers are skilled at making them seem desirable. So it shouldn't surprise that people want more and more of the stuff that causes these problems. Changing people's habits of disposing of these items into the wastewater won't be easy without effective behaviour change strategies. QLDC is going to need to do much better at this.

They will need suitably skilled people with appropriate backgrounds along with adopting imaginative approaches and providing the right resources.

2 QLDC should implement an evaluation process based on credible, objective science:

The consent conditions should require the applicant to evaluate its behaviour change programmes. A well designed monitoring and evaluation process that is science based can provide evidence of how well the strategies QLDC adopts are working to change public behaviour. It should include objective measures which involve making initial baseline sampling measurements of wastewater pollutants. These would be followed by measurements repeated at regular intervals over the evaluation period. The outcomes of the behaviour change methods can be inferred in part from the changes in pollutant types and levels in measurements taken later and compared to the baseline data, as well as being taken from other perhaps more subjective measurement criteria that may be used in the evaluation.

3 QLDC should be required to change or improve their Education and Communications Plan in the light of what the evaluation process shows:

The applicant has made some changes and additions to the consent conditions in revised Condition 10, "Ongoing Community Awareness". However apart from QLDC's intention to enact new bylaws and the appointment of a trade waste officer, there appears to be little indication in QLDC's modified application of which new strategies and approaches might enhance the prospect of success with changing behaviour.

The additional condition requiring an Education Communications Plan to be prepared within two months of consent being granted gives the consent issuer no power to require any changes to be made to this Plan. The consent issuer won't be able to withhold consent if the plan seems to be deficient, because the consent will have been granted already. The same applies to the proposed annual review of the Education and Communications Plan: the consenting authority will have no power to require changes to the Plan nor to the strategies proposed.

4. *Information about the Communications and Education Plan should be publicly accessible and QLDC should engage openly with its communities.*

Information on the policies, strategies of education and communications including of evaluation of them should be easily accessed by the public on ORC and QLDC websites. The effectiveness of such programmes can be greatly enhanced by effective community engagement. On the contrary the current policy of QLDC appears to favour secrecy in this area which I have found very unhelpful. I attempted on six occasions between July and October this year to obtain information from QLDC on their policies and strategies in education and communication relating to this area. I sent five emails, made one phone-call and one personal approach to a ward counsellor. I received only two replies. Neither provided any of the information I requested. I have received neither an apology nor an explanation nor any follow-up of any kind.

5 *Too long consent duration poses unacceptable risks*

Throughout the 35 years duration of the consent proposed by the applicant, it appears that nothing in the applicant's recently updated conditions enables the consent issuer to require QLDC to alter its approach to community behaviour change strategies where these prove to be ineffective. Such a consent duration would therefore appear to increase the risk that wastewater blockages will occur. New regulations introduced in the future by the new New Zealand Water Authority to protect the safety of freshwater may be limited in their effectiveness if existing consents issued by regional authorities are permitted to take precedence over national regulations until the consents expire.

*Recommendation:* The consent should be for no longer than 10 years, which should be ample time for the evaluation programme to indicate whether QLDC's behaviour change strategies work or not, and to make any modifications to the programme that are needed.

6 *Persuade corporate businesses to stop selling products that cause blockages.*

It seems reasonable that the consent should require the consent holder to also contribute in an effective way towards changing behaviours by corporate businesses which are increasingly major contributing causes of wastewater blockages leading to overflows into freshwater. These businesses promote and sell many products that are implicated in causing wastewater blockages, including so-called "wipes" of various kinds and other so-called "hygiene" products. In recent

years huge increases in worldwide sales of these have been reported, coinciding with notable increases worldwide in reports of sewer blockages. While these are not the only causes of blockages, they are increasing rapidly and can be expected to cause many more blockages in the future if unchecked. <https://www.wateronline.com/doc/fight-against-flushable-wipes-steps-to-recovering-cost-from-manufacturers-0001>

It would be unreasonable to expect the consent holder to bring about behaviour change beyond its borders on its own, however it can be expected to initiate advocacy for change in corporate behaviour throughout this country. A consent condition should require that they do this. They could work through Local Government NZ to coordinate their efforts in partnership with other local and regional government authorities, including the newly emerged New Zealand Water Authority.

*Points for a corporate behaviour change strategy to focus on could include:*

- Outlawing of plastics in wipes and other sanitary products which have been shown to be a major cause of wastewater blockages overseas. Plastics take centuries to break down. UK is reported to be about to ban the use of plastics in such products.

<https://www.onegreenplanet.org/news/wet-wipes-made-plastic-uk-wants-banned/>

<https://www.scottishwater.co.uk/en/About-Us/Energy-and-Sustainability/Sustainability-and-Climate-Change/Plastics>

- Providing retailers, manufacturers, importers, wholesalers, central government with research evidence of the causes of blockages and what they can do to help. <https://www.statista.com/statistics/791485/wastewater-inlet-blockage-causes-united-kingdom-uk/>
- Persuading retailers not to stock products that cause blockages.
- Persuading marketers of these products to place effective warnings and advice on packaging.
- Applying to the NZ Commerce Commission to undertake legal action against companies that contravene the Fair Trading Act by marketing deceptively labelled sanitary products as “flushable” that are not. Example of a New Zealand retail chain marketing wipes as “flushable”:

<https://shop.countdown.co.nz/shop/searchproducts?search=flushable+wipes+toilet>

- Promotion of effective technology for removal of grease and fats from wastewater.

*In conclusion:*

I feel that the consent applicant’s amended conditions may be a good start but more should be required of them.

The applicant needs to demonstrate that its proposed strategies have been developed and are implemented and run by people whose skills and backgrounds are credible and who are appropriately resourced.

Strong engagement with the community is vital for success. Without this people with relevant skills and experience in our own communities may be overlooked and opportunities missed.

The consent must require that the consent holder provide to ORC through monitoring and evaluation, objective, research-based evidence of the effectiveness of their behaviour change approaches and strategies, and the consent issuer must have the power to require changes to these if they prove inadequate. To make this possible, the consent duration should be for no longer than 10 years.