

No.	Submitter name	Stance	Submission Summary	Relief sought
1	Ngawhainga Kiriona-Winiata	Oppose	Submission reads: <ul style="list-style-type: none"> • Te Rotorua nui a Kahumatamomoe is a taonga not a toilet • The discharge would be contrary to section 6 of the Resource Management Act which protects the lake as a matter of 'national importance' from inappropriate use • The effect or impact of the discharge on the lake, its surrounding ecology and the people who swim and eat from it are unknown 	These submitters seek that applications are declined, however if granted, seek that the duration of the consent be reduced from 35 years to three years and that over this period, an intensive testing and monitoring programme incorporating matauranga Maori and other sciences be implemented by an independent group whose recommendations to the consent holder are binding. Furthermore, that the three year consent only be extended if the discharge is not having an adverse impact on the lake and lake users.
2	Maria Eves			
3	Paul Khan			
4	Christine Julia Phillips			
5	Vicki Elizabeth Tamati			
6	Pirihira Paul			
7	Shaniel Thomas			
8	Teaooterangi Apaapa			
9	Samuel George Kirner			
10	Gina Hohaia			
11	Loressa Farrell			
12	Rhipa Taiatini			
13	Michael Te Hira			
14	Natalie Richards			
15	Karen Stowers			
16	George Hakopa			
17	Heather Patu Tikitere Patu-Ngataiawhio Mataatira Patu-Ngataiawhio			
18	Hinerangietahu Leah Hakopa			
19	Millie Patu			
20	Leigh-Ann Tamati			

21	Rotorua homeless whānau kore-kainga Ngāti Makariri - a petition signed by 50 individuals			
22	Pouariki Tainui Ngatai	Oppose	As per 1-22 above but with following additional point: That direct consultation with Ahi kaa to which the flow of wastewater will pass their boundaries (mana whenua) especially the hapu of Ngāti Tunohopu, Ngati Hurunga Te Rangī, Ngati Te Roro o Te Rangī, Ngati Uenukukopako, Ngati Tuteniu, Ngati Rangiteaorere an Ngāti Pīkiao be addressed, kanohi ki te kanohi	
23	Blanche and Edward Kiriona	Oppose	Submission outlines that application is not supported for the following reasons: <ul style="list-style-type: none"> • Cultural degradation • Economic degradation (we have a business proposed for the lake but we require clean water in order for it to work) • Social degradation • Environmental degradation • Adverse health and wellbeing on our tribal members 	Decline but if granted seeks a significant decrease in the proposed duration of the consent.
24	Ngāti Tuteniu Hapū Trust			
25	Christopher Kiriona			
26	Craig Pirika			
27	Kipa Hohepa			
28	Whetureia Kiriona			
29	Reynold Macpherson	Opposed but supports upgrade of WWTP	Key points of submission as follows: <ul style="list-style-type: none"> • Fully supports the upgrade the WWTP. • Opposed the land contact bed and the direct discharge of treated wastewater to Lake Rotorua. • There is no geotechnical evidence to show what that the formation of the discharge channel will unearth (site previously a landfill). • The destruction of unique Outstanding Natural Features in Puarenga Bay cannot be mitigated. 	Decline all consents sought from BOPRC, with the exception of consent sought to discharge to treated wastewater to land. Support for this consent is caveated on the discharge being to Whakarewarewa Forest.
30	Peter Jones			
31	Francesca Musumeci			
32	Paddi Hodgkiss			
33	Raewyn Aroa			
34	Rick Thame			
35	Allan and Rosemary Mackenzie			
36	Joseph and Dorothy Gielen			

			<ul style="list-style-type: none"> • Evidence presented by McBride, Hamilton et al shows that the N and P levels in the treated wastewater direct discharge will exceed the levels as adopted by the “Integrated Framework” in the Freshwater Regional Policy Statements. • Currently the swimmability grading for Lake Rotorua is “good”. The National Policy Statements (NPS-FW) seeks 90 % of NZ fresh water bodies to be swimmable by 2040. Proposal is at odds with this target. • Evidence presented by McBride and Hamilton et al tells of the treated Wastewater in the direct discharge option will accumulate at the Lakefront in certain NE wind conditions. This will heighten potential toxic algae blooms and weed growth at the Lakefront • Approximately \$240m is spent/budgeted from crown, local government and land owners to spend on our lakes for restoration programmes. There has been significant investment into the removal of Septic tanks in rural areas around lake Rotorua and proper reticulation of sewerage installed to pump sewerage back to the WWTP. • The proposed Full scale MBR Plant will have a capacity of 70m litres per day, (up from the current 20m litres) with a current removal rate of 90% N and 97% P, will mean that the potential loadings into Lake Rotorua could be 109 t N per year. The Integrated Framework allows for an allocation of 30 t N for wastewater disposal. That is more than minor • The former timber treatment plant out at Waipa Valley used to treat timber with Dioxins and PCPs. After the new owners of Red Stag took over in 2004, they were required to “seal” the old 	<p>Decline all consents sought from RLC.</p>
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			<p>and disestablished treatment sites. No evidence has been presented about dioxins and PCPs and there leaching into Puarenga stream.</p> <ul style="list-style-type: none"> • The RPS WL3B(c) provides for 435 t N loading for Lake Rotorua by 2032. The same policy (a) states that contaminates be managed to avoid compromising public health, and catchments ecology, mauri, fishability, swimmability, and aesthetics. The proposed WWTP and direct discharge option does not manage the effects above. 	
37	Dr Toni Withers	Opposed but supports upgrade of WWTP	As per submissions 29-36 above but also specifies that proposal will have an adverse effect on tourism, particularly Kaituna River rafting. This will have negative economic impacts upon the image of the region as clean, green, and unpolluted.	
38	Alan James Mends	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • The discharge will facilitate the destruction of Lake Rotorua. • With millions already spent on a failed spray irrigation system it is logical to use a water based disposal system, but this should be a river that flows to the stream. • Katiuna River is more appropriate choice for the discharge, however, and alternative source would be necessary for those extracting domestic water from the Kaituna River. • The Waikato River yields acceptable whitebait and fish while containing treated wastewater from Hamilton, Cambridge and Huntly. 	Decline
39	Stephen Tiipene Perenara Marr	Oppose	Submission provided in Te Reo and translated by BOPRC staff. Key points as follows:	Decline

			Discharging para tiko (shit), and likewise Endothall, is not good for the lakes in the Rotorua District including Lake Rotoiti, Kaituna River and other lakes.	
40	Personal details withheld	Oppose	Submission reads: The discharge of wastewater will deteriorate the lake. Submitter seeks consent be granted for a land discharge only.	Decline
41	Firdaussi Khan	Oppose	Submission reads: The lake is sick	Decline
42	Personal details withheld	Oppose	Key points of submission as follows: Council process <ul style="list-style-type: none"> • The proposal is not reflective of a partnership between Council and hapū. Significant adverse cultural effects are cited but not acted on. • Concerned that Council has favoured a proposal weighted heavily in favour with cost factors. Cost benefit relative to existing scheme is questioned. • Council has been through a consultation process and disregarded feedback. • Lack of consideration of alternatives. • Cost should not be prioritised over lake health and ability of hapū to exercise kaitiaki. Adverse effects <ul style="list-style-type: none"> • The proposal will result in significant adverse effects an outstanding natural landscape. • The quality of the lake will not be improved (N levels reduced) as a result of this new activity. 	Decline but if granted seeks greater capacity to cope with extreme peak rainfall periods as these might be happening more regularly. Address risk of facility impacting lake if affected by an earthquake. Address the “significant adverse cultural effects” with hapū

			<ul style="list-style-type: none"> • Concerned with earthquake risk and raises question of what will happen if the bed of the lake is affected by an earthquake. Does not consider the application to address this issue. • Concerned with the lack of contingencies for unexpected and unintended adverse effects. • References Section 4.5 of the Application which mentions that the WWTP will be able to cope with heavy rainfalls. Refers also to Appendix H (3.8.3.2/3) and states that lake levels have remained high throughout 2018, so 95 year events should not be viewed as rare and highlights importance of contingencies and future proofing. <p>Other</p> <ul style="list-style-type: none"> • Highlights the importance of maintaining lake viability, particularly recreational viability for swimmers, kayakers and for fishing and gathering. • There is a possibility that if things go wrong, there will be huge impacts on the ancestral waterway and in turn Lake Rotoiti and the Kaituna (which has the Wai4). • References statement in Application that Nitrogen entering the lake will be around the same as that which enters the lake via rainfall. Does not consider this justification/attitude to be consistent with Council's efforts to reduce the amount of Nitrogen in the Lake. 	
43	Phillip Tapahiwaka Mutu	Oppose	<p>Submitter seeks compensation for odour and cites an MOU between RLC and BOPRC.</p> <p>Comments that he has lived in Ngāpuna all of his life and has suffered from Council consents, mill pollution</p>	Decline

			<p>and water pollution.</p> <p>Submitter requests a MOU be developed with whānau who will be impacted by odour and poisons in hot and cold springs, and compensation to be a substantial monetary amount, with infringements of large cash fines.</p>	
44	Denise Bradley	Oppose	<p>Oppose discharge of wastewater into Lake Rotorua/Te Rotorua nui a Kahumatamomoe.</p> <p>The discharge is contrary to Section 6 'Matter of National Importance' of the RMA, subsections a- h.</p> <p>Submitter supports the purpose of the RMA and the full impacts and effects of the discharge have not been fully explained by the Lakes Council.</p> <p>We have a duty of care to protect our natural environment and resources and there are viable alternatives for the discharge.</p>	<p>Decline application, or if granted only allow a term of 3 years to establish a monitoring regime that includes matauranga Maori by an independent group. Three year term to be extended only if monitoring shows that the discharge is not having adverse effects.</p>
45	Department of Conservation	Oppose	<p>Sulphur Bay is a Wildlife Refuge of 145ha administered by the Department of Conservation under Section 14 of the Wildlife Act 1953. Adjacent to this refuge is the Sulphur Point Wildlife Sanctuary, an area protected under the Wildlife Act 1953 and the Reserves Act 1977, and also administered by the Department.</p> <p>Key Submission points/issues;</p> <p>(1) The Rotorua geothermal system is internationally recognised for its scientific research values. There are a variety of geothermal surface features in the vicinity of the proposed works including sinter terraces, degassing vents, fumaroles, and acidic pools.</p> <p>(2) The shores and waters of Sulphur Point and the wider Sulphur Bay area (being the location of the proposed works) are a breeding and</p>	Oppose Application.

			<p>roosting habitat for several Threatened and At-Risk species.</p> <p>(3) The area of the proposed works contains significant biological diversity values. Lake Rotorua and its margins are identified as an outstanding natural feature and landscape as well as a significant natural area in the Rotorua District Plan. Geothermal stream sides, geothermal heated ground, and geothermal hydrothermally altered ground are critically endangered ecosystem types present in or near the proposed sites. The proposed works will require the clearance and removal of significant indigenous vegetation. The widening and deepening of the Te Arikioa thermal channel may require tracks to be cleared for machinery, as well as removal of vegetation along the margins of the channel. The disturbance of geothermal vegetation may result in weed encroachment into disturbed areas. These works will have significant adverse effects on the biological diversity values of the area.</p> <p>(4) The proposed conditions of consent do not adequately avoid, remedy, or mitigate the adverse ecological effects of the proposal. The Director-General considers that the proposal will result in significant adverse effects on nationally significant ecosystems, threatened and rare indigenous biodiversity, and is not in accordance with the purpose of the Resource Management Act - to promote the sustainable management of natural and physical resources.</p> <p>(5) The proposed discharge will result in an increase in nutrients in Lake Rotorua which may result in adverse effects on water quality in Lake Rotorua,</p>	
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			<p>including Sulphur Bay.</p> <p>(6) The potential accumulation of treated wastewater in the vicinity of the Rotorua lakefront and localised increases in phytoplankton biomass may have adverse effects on water quality and the Threatened bird species</p> <p>(7) The application contains no assessment of the likely impacts of the additional phosphorous in the lake in terms of the need for increased alum dosing of Lake Rotorua, and any consequential effects of these increases</p> <p>(8) The applicant's evaluation of the significance of the sulphur flats surface geothermal features is inconsistent with the requirements of the Bay of Plenty Regional Policy Statement Appendix F Set 7 of the RPS which identifies three criteria sets that need to be used to assess the significance of geothermal features. These are natural science factors, aesthetic values, and associative values.</p> <p>(9) The application provides no certainty regarding the size of the proposed earth bunds in terms of both volume and height, with variances in the estimates of both. Clarification of the estimated volume of earthworks for the bunds is required.</p> <p>(10) It is unclear how it was concluded by GNS that the probe refusal at a depth of 0.6m was caused by the presence of a pan. GNS has presumed that the inferred pan is a silica sinter based on inadequate information.</p> <p>(11) The nature and scope of works on the <i>Te Arikiroa Thermal Channel</i> are also unclear.</p> <p>(12) The proposed excavation and earthworks have the potential to result in a hydrothermal</p>	
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			<p>eruption. The risk of hydrothermal eruption is not limited to the Te Arikioa Thermal Channel. None of the reports contain an overlay of the Sulphur Flats thermal features on the proposed bund locations.</p> <p>(13) The proposed works as set out in the applications are inconsistent with the provisions of:</p> <ul style="list-style-type: none"> • The purpose and principles of the Resource Management Act 1991 including Sections • 6(b) and 6(c); • The New Zealand Policy Statement for Freshwater Management 2014 including • Objective A1 and Policy A4; • The Bay of Plenty Operative Regional Policy Statement including policies EI 5B, GR 4A, • GR 9B, GR 11B, MN 1B, and MN B2; • The Bay of Plenty Operative Rotorua Geothermal Regional Plan 1999 including • Objective 13.5.1, and policy 13.5.2; and • The Rotorua District Plan including objectives 1.2.1, 1.3.11, 2.3.1, 2.3.2, 2.3.4, 2.3.5, • 2.3.7 and the associated policies. <p>The conclusion of the submitter is: <i>The preferred option has significant adverse effects on significant natural areas, outstanding natural features and landscapes, Threatened and At-Risk species and significant geothermal features. The Director-General considers that this option has been selected based on inadequate assessments, and there needs to be further</i></p>	
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			<i>consideration of the alternatives.</i>	
46	Lani Rangitaiari Kereopa	Oppose	<p>Submitter is a descent of Te Arwa hapu/iwi and associated Te Arawa entities who have significant customary and cultural links to Te Rotorua-nui-a-Kahumatamomoe.</p> <p>Te Rotorua-nui-a-Kahumatamomoe is a taonga not a toilet or drain.</p> <p>The ability of the submitter's whanau to practice kaitiakitanga over the lake has been severely restricted by the applicant because;</p> <ul style="list-style-type: none"> (a) RLC continues to opt for cost-saving/.financial fiability instead of doing what is best for the health and well being of the lake, (b) RLC continues to use colonisation tactics in which a Pakeha worldview will always supercede Te Arawa kawa and tikanga, (c) RLC continues to use colonisation tactics to discount and avoid options grounded in matauranga Maori, (d) Discharge is contrary to Section 6 of RMA, (e) There are gaps in the assessment of effects, (f) The affects and impacts on our awa, lakes, moana and connected ecosystems as well as the people are unknown, and (g) Pakeha science has previously advocated spraying of wastewater into forest with disastrous results. <p>While Te Arawa representatives have worked with RLC, their participation and input cannot be seen to mean our whanau, hapu and iwi support the proposal. As weather patterns change, the protection of waters has never been so important.</p>	<p>Decline discharge of treated wastewater.</p> <p>If granted only allow a term of 3 years to establish a monitoring regime that includes matauranga Maori by an independent group.</p> <p>Three year term to be extended only if monitoring shows that the discharge is not having adverse effects.</p>
47	John Gifford	Oppose	<p>Submission to both the regional council and district council applications.</p>	<p>Support upgrade of the WWTP but seek decline</p>

		<p>Key submission points/issues;</p> <p>(1) The effect of the discharge of treated wastewater on the medium to longer term eutrophication status of Lake Rotorua due to the impacts of climate change. The applicants's analysis appears to have omitted or not assessed the direct impacts of climate change and the impacts of climate warming on both the concentration of nutrients in the bottom waters of the lake, the effect of greater internal nutrient cycling and impact of more thermal stratification.</p> <p>(2) The discharge of the treated effluent on the mass loads of metals into Lake Rotorua and that the residual concentrations of metals and in particular heavy metals will limit reuse of treated wastewater. The effect of these mass loads have not been assessed in the Environmental Effects Assessment report and no information or modeling is provided on the ecological impact that the discharge will have on biota over the 35 years of the proposed consent period.</p> <p>(3) The area adjacent to the Wastewater Treatment Plant was once a landfill and that the proposed excavations associated with modifying the area around the Te Arikioa Thermal Channel are likely to be contaminated with chlorinated organic compounds originally arising from the use of Pentachlorophenol at the Waipa Sawmill.</p> <p>(4) The Rotorua Lakes Council has developed a restoration plan for the Sanatorium Reserve area (this is the area inclusive of the Te Arikioa Thermal Channel). The proposed discharge of treated wastewater via the Te Arikioa Thermal Channel is not consistent with the RLC plans for this restoration project.</p>	<p>of discharge of treated wastewater via land contact beds and associated regional council applications.</p> <p>Decline land use and District Council applications.</p>
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48	Jane Porter	Oppose	Submitter does not support a discharge into Lake Rotorua or any expansion of infrastructure at the WWTP.	Decline
49	Joseph Slade Douglas Brown	Oppose	Submitter comments that the pollution of Lake Rotorua must stop.	Decline
50	Personal details withheld	Oppose	<p>Submission provided in Te Reo and translated by BOPRC staff. Key points as follows:</p> <ul style="list-style-type: none"> • Submitter considers information inside the application to contain false information. • Submitter empathises with the water, from which our bodies descend from the land, water and the environment and our spirituality descends from the heavens. • Submitter notes that the mauri of water can only be felt; it cannot be dismissed or explained in words. • Does not consider adequate consideration has been given to alternatives. • Submitter considers that water logging in the forest will be due to a lack of area, and considers further research is necessary to determine cause of leaching. • Highlights that Council has not accepted land which has been offered to it for an alternative land treatment system. 	Decline
51	Ngāti Uenukukōpako Iwi Trust	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • Ngati Uenukukopako, Ngati Te Roro o te Rangi, Ngati Hurungaterangi, Ngati Rangiteaorere / Tuteniu and Ngati Tunohopu (including ahi-kaa) have occupied their lands on the eastern shores of Rotorua-nui-a-Kahumatamomo since prior to 	Decline the applications

			<p>the arrival of Europeans in Aotearoa and hold undisputed mana whenua.</p> <ul style="list-style-type: none">• Ngati Uenukukopako however has fundamental concerns about the preferred discharge option proposed by the applicant. Consultation by the Rotorua Lakes Council, as applicant, with those hapu known to be significantly and directly adversely affected has been totally inadequate and the Council's approach to the assessment of cultural effects falls well short of the requirements of the Resource Management Act 1991, as well as the policies and expectations of the Regional and District planning instruments.• The submitter considers that RLC has failed in its responsibilities with the existing consent. RLC by has belatedly put forward an alternative which is culturally unacceptable which gives little confidence in RLC aptitude.• Ngati Uenukukopako, Ngati Te Roro o te Rangi and Ngati Tuteniu maintain that no proper and meaningful consultation has taken place with us regarding the proposed wastewater upgrade and preferred discharge option.• In reference to the goal of the Rotorua Project Steering Committee to select from various options an alternative which, amongst other things, "<i>Acceptably meets the cultural needs of tangata whenua</i>" (refer page 12 section 3.2, second bullet point) the Trust is totally opposed to, and highly offended by, the mechanism Rotorua Lakes Council set up to address cultural matters.• The establishment of the Cultural Assessment Subcommittee and their appointment of an independent consultant to prepare an	
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			<p>assessment of effects of the discharge of treated wastewater to Lake Rotorua through a land contact bed at Puarenga Bay only served to further marginalise the directly affected hapu from the process. The assessment of cultural effects is inadequate and fails to comply with the provisions of the regional policy statement.</p> <ul style="list-style-type: none">• The Trust opposes the Land Contact Bed Concept. Ground water travelling through Papatuanuku can take up to 80 years to reach Rotorua-nui-a-Kahumatamomoe, whereas the Land Contact Bed tries to mimic Papatuanuku by traversing wastewater into Rotorua-nui-a-Kahumatamomoe in 18 hours.• Reference in the application to a finding of the Waitangi Tribunal “<i>that the waters of Sulphur Bay are not used for any purpose</i>” (refer page 112, section 7.8.1) is misleading.• The Trust is also concerned about effects on an array of bird species and their habitat (including the nationally threatened New Zealand dabchick, banded dotterel and black-billed gull) from the construction and use of the Te Arikiroa Thermal Channel.• The Trust also strongly contests the applicant’s assertion in the Executive Summary that “<i>The preferred Scheme will not increase nutrient inputs into Lake Rotorua above those provided for in the BOPRC’s ‘allocations’</i>”.• The application does not however address the issue of emerging contaminants which do not breakdown in wastewater treatment processes. These contaminants include endocrine disruptors, diabetes drugs, anabolic steroids, pesticides, herbicides, personal care products	
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			<p>and pharmaceuticals including methamphetamines. In addition to cultural reasons, the Trust also oppose direct discharge into Rotorua-nui-a- Kahumatamomoe as once these emerging contaminants are in the lake there is no getting them out.</p> <ul style="list-style-type: none">• Uenukukopako is sceptical about Rotorua Lakes Council's stated intentions of recycling or reusing treated wastewater, especially when their engineering department has rejected every suggestion hapu members have put forward because it is cost prohibitive to pump the wasterwater anywhere.• Uenukukopako oppose the wastewater from all three out of catchment locations being reticulated into Rotorua-nui-a-Kahumatamomoe.• Uenukukopako have advocated for many years to remedy these cross- connection issues to prevent overflows into the Puarenga Stream in heavy weather events, exacerbating the water degradation of the Puarenga which flows directly into Rotorua-nui-a- Kahumatamomoe.• The Trust can confirm that there are in fact three marae in the area and all have reported adverse odour impacts from the Wastewater Treatment Plant dependent upon wind conditions at the time.• The proposal will not promote the sustainable management of natural and physical resources and is contrary to Part 2 and other provisions of the Resource Management Act 1991;• In particular it will not implement or otherwise meet the strong directions contained in section s 6(e), 7(a) and 8 of the Resource Management Act 1991;	
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			<ul style="list-style-type: none"> • The proposal will not avoid, remedy or mitigate adverse effects on the environment; • The proposal is inconsistent with and contrary to the relevant provisions of policy statements and plans, including objectives and policies in the Bay of Plenty Regional Policy Statement and Bay of Plenty Regional Natural Resources Plan which recognise and provide for matters of significance to Maori. 	
52	Robyn Andrews	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • Recent effects to clean lake have cost a large amount of money and have been supported by many groups and individuals. • Systemic pollution had made the lake toxic for people, plants, kaimoana, birds and wildlife, and Rotorua was lauded as a proactive area in regard to environmental policies to improve its wellbeing. • Lake Rotorua is treasured by locals (both Māori and Non-Maori) and it should be maintained as a treasure for the peoples of Rotorua and visitors to the region. 	Decline but If the proposal does go ahead, there should be yearly testing and data collection to determine environmental impacts, involving local iwi and hapū.
53	Personal details withheld	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • The concerns by tangata whenua, mana whenua, have not been addressed despite what the reports claim. • Submitter is concerned that cost has impacted the decision when it should be best practice guiding decisions. 	Decline
54	Rotorua District Residents and Ratepayers C/O Reynold Macpherson	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • The discharge will add nitrogen (N) and phosphorus (P) and contradict the solid efforts made by BOPRC, farmers and many others in the Rotorua District to continue cleaning up our lake. 	Decline. Seeks seek a determination that directs the RLC to continue discharging

			<ul style="list-style-type: none"> • Submitter disagrees with the direct referral process and comments that RLC has bypassed BOPRC. • References the MOU negotiated between the Council and Central North Island iwi which agrees that irrigation of wastewater in the Whakarewarewa Forest will cease by 2019. This MOU. Considers this MOU as political window dressing which holds Rotorua's residents and ratepayers to ransom. • Indicates that irrigation should continue in the Whakarewarewa forest as RLC has an easement in perpetuity and notes that it has used just over half of the forest area available under this easement, which may be one reason for the saturation, run off and tree damage problems; which suggests the need for better irrigation management, not an alternative discharge system. • Specifies that only 230 ha of the current 430 ha easement area is used in Whakarewarewa for spray irrigation. • Highlights that estimates of costs put the land contact cheapest, but not hugely cheaper than sustaining and extending forest irrigation. • Concerned with the risks of overflows in the event of a breakdown, wastewater surge or similar and notes that these will increase in time due to climate change. In such an event nutrients will enter Lake Rotorua, Lake Rotoiti, through the Ōhau Channel and eventually the Maketu Estuary. 	into the Whakarewarewa Forest unless an alternative is agreed, but not including discharge into Lake Rotorua.
55	Jacobus (Harry) Brassier	Oppose	Submitter notes that RLC has discharged waste water in the Whakarewarewa Forest for many years without major problems and considers this to be the cheapest	Decline.

			<p>solution. Concerned that a direct discharge to Lake Rotorua will public health and “swimmability”. Does not consider that treatment will remove all Nitrogen and phosphorous.</p>	
56	Janice can de Bemd	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • Te Rotorua nui a Kahumatamomoe is a taonga not a toilet • The use of the lake will be severely restricted by RLC which has prioritised cost savings over environmental sustainability. Provides example of other options such as reverse osmosis treatment or geothermal technology being discounted. Makes reference to \$21 million associated with lakefront makeover. • Considers that RLC are restricting the scope of the conversation to the waste water treatment plant at Ngapuna rather than a wider discussion on dealing with waste before it reaches the plant (eg, dry composting, education campaign). • The discharge would be contrary to section 6 of the RMA which protects the lake as a matter of ‘national importance’ from inappropriate use. • Concerned with a lack of information whether or not the most serious contaminants will be removed before being discharged to the lake. • Concerned with the credibility of consultants who have stated that treated wastewater will be safe enough to drink, and cleaner than the water currently in the lake. • Concerned with the impact of the discharge on the lake, its surrounding ecology and the people who swim and eat from it. • Submitter acknowledges people at Ngapuna (Hurunga te Rangi). 	<p>Decline</p> <p>If granted, seeks that the consent term be reduced to three years and that over this period, an intensive testing and monitoring programme incorporating matauranga Maori and other sciences be implemented by an independent group whose recommendations to the consent holder are binding.</p>

57	Renee Pureti Kiriona	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • Te Rotorua nui a Kahumatamomoe is a taonga not a toilet. • The lake is already sick (TLI - 4.1) • The ability of hapū to practice kaitiakitanga over the lake will be restricted by RLC which has prioritised cost savings over environmental sustainability. Provides example of other options such as reverse osmosis treatment or geothermal technology being discounted. Makes reference to \$21 million associated with lakefront makeover. • Considers that RLC are restricting the scope of the conversation to the waste water treatment plant at Ngapuna rather than a wider discussion on dealing with waste before it reaches the plant (eg, dry composting, education campaign). • The discharge would be contrary to section 6 of the RMA which protects the lake as a matter of 'national importance' from inappropriate use. • Concerned with a lack of information whether or not the most serious contaminants will be removed before being discharged to the lake, considers that some contaminants will still remain in their wastewater after it has been treated (eg, 28% more E.coli, 10% more lead and 12% more arsenic just to name a few). • Concerned with the impact of the discharge on the lake, its surrounding ecology and the people who swim and eat from it. • Submitter acknowledges people at Ngapuna (Hurunga te Rangi). 	<p>Decline</p> <p>If granted, seeks that the consent term be reduced to three years and that over this period, an intensive testing and monitoring programme incorporating matauranga Maori and other sciences be implemented by an independent group whose recommendations to the consent holder are binding.</p>
58	Sharon Taiatini	Oppose	<p>Submitter comments that wastewater will deteriorate the lake and supports a land discharge only.</p>	Decline

59	Personal details withheld	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • The wellbeing people will be drastically impacted as a result of the discharge. • Submitter states: “my people believe they are part of the lake, and the lake is part of us”. • Submitter outlines that Rotorua has one of the highest suicide rates in New Zealand along with issues around addiction and poverty. Submitter considers that if treated sewerage is discharged into our lake, this will impact on our people and the Te Arawa identity further. • Submitter’s is concerned that people can no longer fish, gather kaimoana and other resources from the lake. • Submitter notes that cultural practices are integral to wellbeing, and notes that the discharge will have negative impacts on the wairua of people and future generations to come. • Submitter states that her hapū needs to be included through the whole process of making any decisions about our lake or lands. Any decision made in regard to our ancestral waters and lands, must be driven by our hapu. Processes must be self determined by our Te Arawa hapu, and not by a government body. • The outlined nitrogen and phosphate levels are high, above ANZECC guidelines. • Concerned with the mention that in events of prolonged high rainfall there will be partially treated or untreated effluent flowing into the lake. Indicates that climate change will inevitably cause such events to become more frequent. 	<p>Decline</p> <p>If consent is granted, submitter seeks a discharge is to land, and for RLC to further invest in supporting home owners to utilise sustainable options such as composting toilets and making all decisions alongside hapū.</p>
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60	Ngaire Khan	Oppose	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • Submitter questions whether testing for drugs in the wastewater been undertaken and requests information about the harmful effects. • Submitter identifies that her whenua is directly across the Wastewater plant (within 40 metres) and put up with the odour for many years. • Submitter states: “our Taonga underneath is the geothermal hot springs and on Ngapuna A 2nd Residue is the cold springs. To understand our whenua is well balanced with hot and cold springs known as Ngapuna.” • Submitter asked who can be sued if proposal is granted consent. • Submitter sites MOU between RLC and BOPRC and indicates that the purpose of this MOU is to ensure tonga is looked after without the wastewater sipping into puna. Requests that iwi and hapū receive information from Councils regarding water monthly testing concerning our hot and cold springs. • In relation to odour Release, submitter references a MOU with RLC & BOPRC to establish a health hub at Hurunga Te Rangi Marae at the cost of these Councils. Submitter seeks that whānau of Hurungaterangi have access to weekly check-ups by its own respiratory nurses funded by the Councils. • Submitter references land corrosion and asks who will be updating and keeping records of deterioration of land plants. Submitter requests all testing information is shared with be shared with Hurunga te rangi Whanau. 	Decline.
61	Kevin Winters	Opposed	Key points of submission as follows:	Decline

		<p>but supports upgrade of WWTP</p>	<ul style="list-style-type: none"> • The Rotorua lakes attract approximately 100,000+ visitors per annum to enjoy the fishing, boating, skiing, bathing, swimming, canoeing, kayaking and rowing opportunities, on our doorstep. The majority of these activities occur on Lakes Rotorua and Rotoiti. Having environmentally friendly practises is critical to visitor experience. • Submitter describes previous poor quality of water which resulted in toxic algae blooms, large swaths of lake and cyanobacteria in Lake Rotorua and Lake Rotoiti respectively. Submitter describes the improvement in Lake Rotoiti's water quality since the construction of the Ohau Channel Diversion. Submitter notes that Lake Rotorua's Trophic Level Indicator (TLI) has improved considerably in the last 10 years and the TLI is now 4.1. • Submitter provides background in relation to the Lake Water Quality Restoration programmes for the 12 lakes in Rotorua which began in 2006, including the Rotorua Te Arawa Lakes Strategy Group (RTALSG) which was formed by the Crown, Bay of Plenty Regional Council (BOPRC), Rotorua District Council RDC/RLC) and TALT. • Submitter states that to date approximately \$240m has been spent/budgeted to restore the water quality in the 12 Rotorua lakes and that Lake Rotorua's water quality has seen considerable improvements in the last decade with a whole suite of interventions including in-lake treatment work and on-land catchment work. • Submitter provides background on Rotorua 	
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			<p>Waste Water Treatment Plant (WWTP) and the upgrades it has had dating back to the 1960s. Submitter cites different disposal options that have been considered in the past.</p> <ul style="list-style-type: none">• Easements were created between RDC and Her Majesty's Government to allow wastewater to be pumped into a land treatment spray irrigation system (LTS) of approximately 430 ha of the total area of Whakarewarewa Forest. These easements are "in perpetuity". Submitter considers that RLC has made hasty decision "to get out of the forest by 2019 and has not considered the Whakarewarewa Forest as a possible solution.• The notes that the current consent for RDC allowed by the Environment Court in 2013 is for 50 tonnes N and 4 Tonnes of P per annum measured at the plant for discharge into the Forest. Submitter considers land (namely forests) treatment disposals sites are the best in terms of environmental outcome, however, that the LTS site has been poorly managed.• There are a significant number of Outstanding Natural Features that make up Puarenga Bay. There are significant native trees, native birds, native shrubbery, along with the naturally occurring geothermal sinter features. Some of Rotorua's (hence New Zealand's) finest geothermal boiling mud-holes and steam vents occur and make up the Sanatorium Reserve through which the Te Arikioa Thermal Channel flows.• Submitter provides details of the agreed "Integrated Framework" (IF) of the current lake management programme which identifies the	
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			<p>sustainable loading is 435 tonnes of N per annum. Currently the N loading is 755 tonnes per annum. The IF requires an overall reduction of N loading into Lake Rotorua of 320 tonnes per annum. Submitter discusses the IF agreed reduction actions, and cites that in the RPS, of the 435t of N loading into Lake Rotorua, there is an allowance for RDC of 30t of N from the WWTP. The current consent, is 50t of N per annum measured at the WWTP. The 50t represents 11.4% of the N in the lake that will come from a point source discharge option. Submitter considers this a “more than a minor” effect.</p> <ul style="list-style-type: none">• The RPS WL3B(c) provides for 435t N loading for Lake Rotorua by 2032. The same policy WL3B (a) states that contaminants be managed to avoid compromising public health, and catchments ecology, mauri, fishability, swimmability, and aesthetics. The submitter does not consider the proposal to comply with this policy. Submitter considers this policy will be further compromised during frequent extreme “weather bombs” when the WWTP can be loaded up to 40m litres per day now, or if there is power loss at the WWTP which will result in raw sewerage being spilled into the local stream and then into the lake.• Submitter states that A full scale MBR Plant can remove 97% of P leaving a residual 0.40 mg / l of P. The same plant can only remove 90% of the N, leaving a residual 4.3 mg / l of N in every litre of water leaving the plant. The volumetric capacity of the proposed plant will be 70m litres per day. The current capacity is 20m litres per day. 20m	
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			<p>litres per day at 4.3mg/litre concentration for a year equals 31.390t N per year. If the future capacity of the upgraded plant is planned to be 70m litres per day.and using the same N concentration, then the point source discharge option will be 109.8t N per year. This represents 25% of the total N loading into Lake Rotorua. That is “more than minor”.</p> <ul style="list-style-type: none">• Submitter cites evidence presented by Dada, Hicks, Ling, Hamilton, McBride and Abell which states: <i>“Relative to operation of the LTS the proposed option will increase N and P loads into Lake Rotorua. In isolation, this will contribute to adverse water quality and ecological effects associated with eutrophication. Projected total N and Total P concentration in the treated wastewater equates to maximum loads of 40t N pa and 3.0t P per annum... although the predicted long-term effects on lake trophic status are minor (negative), there is potential for more pronounced localised effects on productivity. These could include local increases in phytoplankton biomass in the southern area of the lake during periods when background nutrient concentrations in the lake are at limiting concentration, eg during stratified periods in the summer. Such conditions could also occur some distance from the outfall, in areas where dominant mixing process cause the discharge treated wastewater to accumulate. Three-dimensional modelling showed that discharge to Sulphur Bay could result in accumulation of treated wastewater in the vicinity of the Rotorua Lakefront following prolonged NE winds”</i>• Submitter notes that according to this same	
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			<p>evidence, there are 20 metals that are higher than the baseline. In Sulphur Bay the only metal that exceeds the 90% base line is aluminum.</p> <ul style="list-style-type: none">• Submitter questions whether the proposed increase in flows of treated wastewater will disturb the unknown amount of dioxins and PCPs in the Puarenga Stream.• Submitter is concerned with uncovering contaminated materials during excavation near old landfill site.• Submitter is concerned that WWTP will not be able to accommodate increasing population and increasing tourism into the future.• Submitter concerned that proposal will compromise plans to reticulate other lake communities back to the WWTP, such as Lake Tarawera. In particular concerned that the WWTP will not be able to cope with these additional loads.• Submitter notes that the Project Steering Group (PSG) unanimously supported the upgrade of the WWTP to the full MBR/Alum dosing/UV sterilisation standard, but did not unanimously support from Iwi to direct discharge into Lake Rotorua.• The NPS-FM directs regional councils to set objectives for the state of fresh water bodies in their region. Some of the key requirements are to:<ul style="list-style-type: none">○ Safeguard fresh water life supporting capacity, ecosystems and indigenous species;○ Safeguard the health of people who come in contact with the water;○ Maintain or improve the overall quality of	
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			<p>fresh water within fresh water management unit;</p> <ul style="list-style-type: none"> ○ Improve water quality so that it is suitable for primary contact more often; ○ Protect the significant values of wetlands and outstanding freshwater bodies. ○ The above list is not exhaustive. <p>Submitter does not consider the proposal to have regard to the NPS-FW. Submitter questions how the proposal will improve the swimmability of Lake Rotorua, and what the perception of swimmers will be at popular swimming areas such as Holdens Bay.</p> <ul style="list-style-type: none"> • Submitter questions how a direct discharge from the WWTP to the lake aligns with a 40 million dollar lake front upgrade and considers the lake front upgrade will be successful only if there are continual water quality improvements in Lake Rotorua. Submitter cites technical reports (McBride <i>et al</i>) which indicate that treated wastewater will accumulate at the lake front in certain NE wind conditions. • Submitter questions whether there will be uptake on wastewater reuse option due to perception issues. • Submitter considers the proposal to be a step back in time which will result in past mistakes being repeated. • Submitter cites Wildlands Consultants report which states a discharge outside the Outstanding Natural Feature and Landscape area is preferable and further states that this is probably the only geothermal river-lake sinter delta in the country (Page 45). Submitter notes that the Wildland's final overall assessment is 	
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			<p>based on having a detailed design, which has not been provided.</p> <ul style="list-style-type: none"> • Submitter considers this direct discharge option into the Te Arikioa thermal channel will degrade our natural landscape features and will destroy those intrinsic values of the Sulphur Bay sinter zone. • Submitter considers the only way forward is for RLC and Iwi Land Owners to work together to expand the disposal sites beyond the current 430 ha of easements, with pine trees being harvested/replanted on a rotational basis, and management based on proven best practise. • Submitter considers it of utmost importance to consider: <ul style="list-style-type: none"> ○ Would you allow your Mokopuna to bathe in the outlet of the revised “land contact beds” or anywhere down the Te Arikioa thermal channel? ○ Would you allow your mokopuna to put their heads under the same water? ○ How is RDC going to mitigate the destruction of the outstanding natural features that are Sulphur/Puarenga Bay. 	
62	Fish and Game NZ	Support	<p>Key points of submission as follows:</p> <p>Fish & Game annually deal with avian botulism occurrences and assist with management of many local district wastewater treatment systems. Avian botulism can result in the deaths of tens, hundreds and in some cases thousands of birds, mostly waterfowl, both protected game and endangered species. Fish & Game are actively seeking local Councils to incorporate within their resource consent conditions of any wastewater</p>	<p>Consents are granted subject to including the agreed avian botulism management conditions and consultation with Fish & Game.</p>

		<p>treatment plants, a management plan to avoid or plan for avian botulism occurrences.</p> <p>RLC have proposed voluntary resource consent conditions (as per Appendix K of the application- 20th August 2018) and the submitter has reached an agreement with RLC that the submissions should be amended as follows:</p> <p><i>Condition 46.</i></p> <p><i>(e) <u>The Land Contact Bed is adequately maintained, including wildlife (waterfowl) management; and</u></i></p> <p><i>(f) <u>The risks associated with avian botulism occurrence and spread at the wastewater treatment plant, including the Land Contact Bed, are minimised to the greatest practicable extent.</u></i></p> <p><i>Condition 47.</i></p> <p><i>(b)</i></p> <p><i>vii. <u>An Avian Botulism Management Plan which outlines the management and monitoring that will be undertaken at the wastewater treatment plant and Land Contact Bed to minimise the occurrence and spread of avian botulism, including response actions that will be adopted in the event that an outbreak occurs.</u></i></p> <p><i>Condition 48.</i></p> <p><i>Prior to submission of the WTPMP under Condition 45, the Consent Holder shall seek feedback from the Medical Officer of Health, <u>Fish and Game</u>, and the Rotorua Tangata Whenua Wastewater Treatment Monitoring Group required by Condition 6. The submission of the WTPMP shall include a summary of the feedback received and how the feedback has been</i></p>	
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			<i>incorporated into the WTPMP and/or reasons for not incorporating certain feedback.</i>	
63	Toi Te Ora Public Health on behalf of Lakes District Health Board (DHB)	Support	<p>Key points of submission as follows:</p> <p>General</p> <ul style="list-style-type: none"> Lakes DHB supports the granting of consents for the applications provided adequate conditions of consent will deliver the local community, and the wider population, with the best practicable and secure sewage treatment and disposal at all times. Should this application be granted Lakes DHB requests that the following conditions be made part of the consent: <p><i>Volunteered Condition 5</i></p> <ul style="list-style-type: none"> A regular review of the conditions of consent will help ensure that the most up-to-date technology, environmental standards and practices are implemented. Lakes DHB suggests consent conditions be reviewed every seven years, rather than every nine years. <p><i>Volunteered condition 25</i></p> <ul style="list-style-type: none"> The proposed level of treatment is supported, as is the design of the WWTP such that the wastewater always receives at least a minimum filtration and ultraviolet dose before being discharged to the land contact bed. During a severe weather event when wastewater is discharged that has not received the appropriate treatment, procedures should mirror what occurs following any unplanned sewage 	<p>That a consent duration of 35 years is granted.</p> <p>That the frequency of review be increased to every 7 years for the duration of the 35 year consent.</p> <p>That specific conditions of consent require;</p> <ul style="list-style-type: none"> The WWTP be designed to prevent the discharge of partially treated wastewater. Any discharge of partially treated wastewater to land or water that does occur to be notified to the Medical Officer of Health. The applicant to inform the public about potential health risks from contact with discharged wastewater. <p>That the period of time for Medical Officer of</p>

			<p>discharged to a public place or water body used for contact recreation.</p> <p><i>Volunteered Conditions 48, 59, 63</i></p> <ul style="list-style-type: none"> The opportunity for Medical Officer of Health feedback to the Wastewater Treatment Plant, Odour and the Beneficial Reuse Management Plans is noted and supported. <p><i>Volunteered conditions 56-60</i></p> <ul style="list-style-type: none"> The DHB supports the beneficial reuse of wastewater provided the practice is protective of health and such reuse does not increase any risk to health. Any reuse of treated wastewater must be in accordance with the New Zealand Guidelines for the Utilisation of Sewage Effluent on Land. It is also recommended that prior to the reuse of treated wastewater off site, either by another person or by the applicant, that an assessment is completed that identifies the extent that the activity will improve and protect public health. <p><i>Voluntary conditions 61 -67</i></p> <p>While Lakes DHB is aware that the RMA defines the term environment to include people and communities, we wish to see condition 61 amended to emphasise that odour from a wastewater treatment plant is primarily managed to protect people from harm. Odour derived from sewage is particularly offensive and most people will have a low tolerance of what is acceptable. Therefore, we support condition 61 and emphasise that any discharge of contaminants (including odour) should be below the level that is likely to adversely affect human health.</p>	<p>Health to feedback to the Wastewater Treatment Plant, Odour and the Beneficial Reuse Management Plans is reasonable and any such feedback is presented to BOPRC when the management plan is submitted for certification.</p> <p>That consent conditions;</p> <ul style="list-style-type: none"> Apply to the applicant and to any other person who may be involved in the treatment or reuse of wastewater. Require any concerns the Medical Officer of Health has regarding the reuse of wastewater shall be addressed by the applicant prior to submitting a Beneficial Reuse Management Plan to the Council for certification. Require an assessment to be
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			<p><i>Land Contact Bed and Discharge Structure</i></p> <ul style="list-style-type: none"> • One of Toi Te Ora’s key responsibilities is to prevent harm by avoiding and reducing risks to health. • In the handling of wastewater our preference is for the land contact bed and discharge structure to be designed so that protections are in place that prevent people from having contact with the wastewater. • The land contact bed and discharge structure should be designed to prevent unintended use as a recreational water feature. • Despite assurances that the treated wastewater will be of a certain quality, no wastewater system is failsafe. It is important that people from all cultures and perspectives are aware that the water is treated wastewater. • Lakes DHB suggests that every effort is made to ensure the public is aware that the water is treated wastewater. This may be achieved through the use of story boards to educate and explain the wastewater’s journey to this point. For instance, what are the sources of wastewater, how has it been treated and the importance to Maori culture that the wastewater is returned to the environment through the land contact beds. 	<p>completed that identifies the extent that the activity improves and protects human health.</p> <p>That condition 61 be amended to clarify that the discharge to air, particularly odour, must not adversely affect the environment and shall protect public health.</p> <p>That the land contact beds and discharge structure be designed to reduce unintentional use by the public and steps are taken to inform the public (including those with English as a second language) that the water is treated wastewater.</p>
64	Te Maru o Ngāti Rangiwewehi/Rangiwewehi Charitable Trust	Support	<p>Key points of submission as follows:</p> <ul style="list-style-type: none"> • Te Maru o Ngāti Rangiwewehi supports the consent with a “<i>conflicted and heavy heart</i>”. • Submitter notes that in an ideal world, it is not their preference for waipara / waitiko to return 	<p>Submitter requests:</p> <ul style="list-style-type: none"> • The tāngata Whenua / Iwi Advisory Group are retained and continue as a monitoring group.

			<p>to their tupuna lake and waterways, but it appears that until a more advanced technological option is available, the alternative 'out of sight out of mind options' will still have consequential effects on waterways.</p> <p>Seeks that conditions are imposed on the consent to:</p> <ul style="list-style-type: none"> • Establish (asap) monitoring and forward planning for better wastewater treatment solutions for the Rotorua and surrounding communities, including continuous involvement and feedback with iwi advisory group (short, medium, long term) and funding lwi led research project for future wastewater options including cultural impacts. • Take into consideration climate change and increasing rainfalls and capacity of daily wastewater / waipara including emergency disturbance impacts on processing over 20million litres daily. • Review and consult on the "Beneficial Reuse Management Plan" so that recovered water that is deemed "high quality treated water" "drinkable" is used sustainably. We should not be flushing drinkable water - part of our 200+L individual daily use with no monitoring. Public need to be encouraged and possible incentivisation to reduce water quantity use. Behaviour changes i.e. conservation of our water, would reduce water draw on springs such as Taniwha Springs. • Explore new business plan alternatives to transporting 'sludge' to Kawerau for worm farms. There will likely be an excess of sludge at 	<ul style="list-style-type: none"> • Manawhenua are compensated / supported in an appropriate manner. • That the tributary and point of discharge at the lake as well as waterways to Maketu retain mauri and mana o Te Wai. • To minimise air pollution and odour, suitable native flora (trees) are planted to offset pollution and promote fresh nitrogen /oxygen. • Widening and deepening of the Arikiroa channel, vegetation removal at channel, or disturbance of geothermal at the site, be undertaken only as a necessity, and no more... that appropriate karakia are conducted prior to any disturbance. • Wastewater maps to be produced and made available to affected tāngata whenua groups.
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			<p>times - realistically where will this go?</p> <ul style="list-style-type: none"> • Mauri monitoring project to be initiated for Te Arawa focused on home to discharge, to sea...as part of the Lakes Water Quality Society / Te Arawa Lakes Programme, by and for tāngata whenua. • Advise how the consents address the Te Arawa Lakes Trust planning document - Te Tuapapa. • Iwi connected to the Puarenga, and Ngapuna iwi are offered procurement contracts re: managing the cultural land contact bed landscaping kaupapa and or another role as cultural monitoring (subject to this being satisfactory as a role they feel appropriate as kaitiaki and manawhenua). • Contaminated water risks are minimised - regular monitoring of water; swimming, drinking, food stocks. Acknowledge these are values to be maintained. • More emphasis on nitrogen and phosphate reduction from farming, horticulture and other high contributors. • Release the research / interviews undertaken with mātauranga Māori experts - publish in a book to acknowledge their contributions and Intellectual Property (subject to their agreement). 	<ul style="list-style-type: none"> • Where possible, replanting is undertaken at Whakarewarewa to mitigate the current polluted state of the ngahere. • That a paper be written to advise how the National Policy Statement on Fresh Water regional policies and plan changes are affected or align to the proposed consents including the BOPRC alum dosing consent renewal for the Utuhina and Puarenga.
65	Te Arawa Lakes Trust	Oppose (late submission)	<p>Key points of submission as follows:</p> <p>Context</p> <ul style="list-style-type: none"> • Te Arawa Lakes Trust (TALT) is the governance entity mandated to represent all registered members of Te Arawa. 	Decline.

			<ul style="list-style-type: none"> • Its decisions are informed by hapū whose contributions to decision-making are delivered to TALT through their respective Trustees. • Te Arawa hapū are ahi-kā, mana whenua, tangata whenua, hunga tiaki, and significant landowners and ratepayers in the Bay of Plenty Region and have occupied land and managed resources in the area for many, many generations. • Ngāti Hurunga te Rangi has provided TALT with an ahi-kā/Mana whenua position statement with respect to the discharge and the Te Arawa Lakes Trust support the position of the ahi-kā/mana whenua. • On this basis the TALT owners of the Te Arawa Lake beds oppose the application by the Rotorua lakes Council to discharge treated Wastewater into Te Arikiroa Channel as it is direct conflict with the position of the ahi-kā/mana whenua and the values with the Te Tūāpapa o Ngā Wai o te Arawa (The Te Arawa Cultural Values framework). <p>Submission points</p> <ul style="list-style-type: none"> • There is no objection to the upgrade of the plant and the level of treatment of the wastewater only to the discharge of the treated wastewater to water - Te Arikiroa and then to the Lake. • It is deemed by those hapū in opposition Ngāti Hurunga te Rangi, that the “land contact bed” prior to the discharge does not sufficiently address their issues. • These hapū wish to see a discharge to land option developed by RLC. • TALT has consistently stated that it does not 	
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			<p>support direct discharge of wastewater.</p> <ul style="list-style-type: none">• There was not unanimous agreement to the “discharge” option and it is noted that the ahi-kā/mana whenua voted in opposition.• The findings from the Cultural Impact Assessment (Companion document number 2 attached to the Application and AEE) are that the proposal to discharge treated wastewater to Lake Rotorua will have significant adverse effects. Those effects are deemed to be:<ul style="list-style-type: none">a) A loss of mana among local hapū who are strongly opposed to the discharge to the Rotoruanui-ā-Kahumatamomoe as a matter of principle. This loss of mana could be described as a belittling of Rangātiratanga (authority of chiefs) by perpetuating an unacceptable activity.b) Effects on the relationship between local resident hapū members and the lake expressed through the activities of fishing and harvesting, cooking and healing. The association of wastewater and the lake as a food basket is anathema to having a kitchen in the toilet/bathroom. This affects the perception of Te Arawa whanau, in particular local resident hapū members to discontinue harvesting of kai and cooking in the lake in proximity to the discharge area (Puarenga). This effect does not extend to the abundance of kai or the quality of the kaimoana.• There are also some negative effects of a low to moderate nature such as effects on the natural character of the Puarenga environment.• TALT agrees that these are significant effects of	
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			<p>the discharge of the treated wastewater to Te Arikiroa Channel and that they cannot be mitigated.</p> <ul style="list-style-type: none">• This assessment also concludes that the proposal to discharge treated wastewater to Lake Rotorua will have some significant positive effects such as on the mauri of the treated wastewater. This will involve the spiritual cleansing of the treated wastewater as it passes through the various experiences and contexts within the land contact bed and be in a state of 'mauri tau'. TALT and Ngāti Hurunga te Rangi do not support that this is a significant positive effect.• A review of the Application through the Te Tūāpapa lens was undertaken and the following is noted;<ul style="list-style-type: none">a) Te Tūāpapa was used by the Cultural Advisory Subcommittee (CAS) to set the framework for developing the solution for the wastewater discharge. The 2 principles of (1) value the role that TALT and Te Arawa have to play regarding the Te Arawa Lakes and (2) the Māori world view, culture and values are a core element of what it means to be Te Arawa.b) The application and the Cultural Impact Assessment in particular outline how the 2 principles have been provided for. The RPSC was largely made up of hapū and iwi whose input and contribution was considered and provided for in the development of the proposal. It is however considered that the role of ahi-kā/manā whenua was not given the	
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			<p>weight or consideration deserved in the process.</p> <p>c) The CAS was established to develop a solution that would address the problem from a cultural perspective. It is recognised that the development of the solution was based on Te Arawa Maturanga and Matapono. The CIA lists the experts consulted on the development of the contact bed. It is the view of the ahi-kā/mana Whenua that at no time did they support the discharge to the Arikiroa channel or the Lake and that despite the efforts of the CAS they cannot support the contact bed and discharge.</p> <p>d) In respect of TE WHAKAPAPA o TE WAI, WAIARIKI and implementation of WAIORA, WAIRUA and WAIATA aspects of the Te Tūāpapa framework there is no direct application of this to the proposal. A full assessment of this framework will be required.</p> <ul style="list-style-type: none"> • TALT agree with the following statements from the CIA: <i>“This project has not identified feasible and acceptable land discharge locations or methods for treated wastewater. This is not to say they may not be available in the future. Medium to long-term alternatives should be explored and subject to feasibility, investigated. The conservation of water at its source (of use) has been a common theme throughout engagement. This assessment recommends that investigating and implementing measures to</i> 	
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			<p><i>reduce wastewater being discharged by reducing the inputs into the plant at their source would have beneficial outcomes. This could include education and awareness programmes, metering, and improvements in the separation of storm water and wastewater networks.”</i></p> <ul style="list-style-type: none"> • A further significant issue for the TALT and Hurunga te Rangi is the treatment of Emerging Contaminants. There is a concern that the Rotorua WWTP will not be able to remove these from the treated Wastewater and therefore the contact bed will not be able to appropriately deal with these as it is for the purposes of achieving “mauri tau”. In neither of these processes can the emerging contaminants be treated. • TALT and Te Hurunga te Rangi do not believe that the Application as it stands, in particular the proposal to discharge treated wastewater to Te Arikiroa, will not avoid, remedy or mitigate the adverse effects on the environment. • TALT and Hurunga te Rangi agree that the Application is inconsistent with and contrary to the relevant provisions of policy statements and plans, including objectives and policies in the Bay of Plenty Regional Policy Statement and bay of Plenty Natural Resources Plan which recognise and provide for matters of significance to Māori. 	
66	Taina Cooper	Oppose (late submission)	Submission reads: That the protection of kaimoana, flora and fauna of lake Rotorua and Mokoia Island is of paramount importance.	
67	Charlene Whatarau- Ngawaka	Oppose (late	As per Submissions 1-22 above.	As per Submissions 1-22 above.

68	Maraea Tinklin	submission)		
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