Trade Waste Discharge Plan 2027

1. Executive Summary

Purpose of the Trade Waste Discharge Plan

The Trade Waste Discharge Plan sets out Manawatū District Council's strategic and operational approach to regulating trade waste and the discharge of trade waste into wastewater networks.

The Plan has been prepared to meet the requirements of section 185 of the Local Government (Water Services) Act 2025 and will guide how Council manages trade waste in a way that protects public health, the environment, Council's wastewater network, wastewater treatment processes, and the safe and efficient delivery of water services.

The Plan does not, by itself, impose enforceable obligations on dischargers. Enforceable requirements are imposed through the Trade Waste Bylaw, trade waste permits, approvals, notices, directions, and any other applicable statutory or regulatory requirements.

Why Trade Waste Needs to be Managed

Trade waste can create risks for Council's wastewater network and treatment plants if it is not appropriately managed. These risks include damage to infrastructure, blockages, corrosion, odour, health and safety risks for workers and the public, adverse effects on wastewater treatment processes, risks to the quality of treated discharges and biosolids, and potential non-compliance with statutory and resource consent obligations. The management of trade waste is therefore an important part of Council's wider responsibility for wastewater services.

Regulatory Approach

Council will apply a risk-based and effects-based approach to trade waste regulation. This means that the level of control, monitoring and reporting required for a trade waste discharge will be proportionate to the nature, volume, characteristics and potential effects of that discharge.

Higher-risk dischargers will generally be subject to greater regulatory oversight, while lower-risk dischargers may be managed through standard requirements or less intensive monitoring.

This Plan establishes the framework, principles and approach that Council will use to manage these risks.

Key issues addressed by this Plan

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The review of Council's existing trade waste framework has identified several areas where updates are required to align with the Local Government (Water Services) Act 2025.

Key issues include the need to:

- recognise the Trade Waste Discharge Plan as the strategic planning instrument for trade waste management;
- update the statutory basis for the Trade Waste Bylaw;
- provide for trade waste carrier permits;
- enable a wider range of permit conditions;
- address accidental or unintended discharges to the environment;
- incorporate internal review rights for declined permit applications;
- align enforcement, offence and penalty provisions with the new legislation; and
- ensure trade waste requirements remain consistent with any applicable wastewater environmental performance standards.

Recommended Approach

Council's recommended approach is to adopt this Plan and replace the existing Trade Waste Bylaw with a new Trade Waste Bylaw 2027. This approach will provide the clearest alignment with the Local Government (Water Services) Act 2025, separate strategic direction from enforceable bylaw requirements, and enable site-specific controls to be managed through trade waste permits.

Implementation Overview

Implementation of the Plan will involve reviewing and updating Council's:

- Trade Waste Bylaw;
- trade waste permit templates;
- application and approval processes;
- monitoring and reporting requirements;
- enforcement procedures;
- fees and charges;
- operational guidance; and
- engagement processes with affected dischargers and stakeholders.

Council will engage with affected trade waste dischargers, industry sectors, iwi, regulators and other stakeholders as part of implementation.

Review and Continuous Improvement

The Plan will be reviewed periodically to ensure it remains fit for purpose. Reviews will consider changes in legislation, environmental standards, wastewater network capacity, treatment plant performance, industry practices, monitoring results and compliance trends.

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Council will use information gathered through monitoring, reporting and compliance activities to improve trade waste management over time.

Overall Outcome

This Plan provides a practical framework for managing trade waste while supporting business activity, protecting community assets, safeguarding public health and the environment, and meeting Council's water services obligations.

2. Introduction

Background

Manawatū District Council provides public wastewater services to communities and businesses across the district. The wastewater network receives domestic wastewater as well as wastewater generated by industrial, commercial, trade, food, health, vehicle wash, manufacturing, processing and other non-domestic activities. Wastewater from these activities is trade waste where it is discharged in the course of an industrial, commercial, trade process or operation, or a related process or operation, into a wastewater network.

Trade waste needs to be managed because it can differ significantly from domestic wastewater. It may contain higher concentrations of organic material, fat, oil and grease, suspended solids, sediment, chemicals, metals, solvents, detergents, cleaning chemicals or other contaminants. It may also be discharged at variable flow rates, in batches or at times that place pressure on the network or treatment system.

This Plan provides a clear framework for managing those risks, supporting appropriate business activity, protecting public assets and helping Council meet its water services, environmental and health and safety obligations.

Role of Manawatū Water Services

Manawatū Water Services is Manawatū District Council's in-house business unit for water services. Manawatū Water Services will administer this Plan on behalf of Manawatū District Council unless Council resolves otherwise or lawfully delegates or authorises particular functions in accordance with the Local Government (Water Services) Act 2025.

Administration may include receiving and assessing trade waste applications, maintaining trade waste records, undertaking monitoring and inspections, advising on permit conditions, supporting compliance responses, engaging with dischargers and carriers, and providing technical advice to Council.

Relationship between the Plan, Bylaw and permits

Instrument	***Role***

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Trade Waste Discharge Plan	Sets Council's strategic and operational approach to regulating trade waste and discharges into wastewater networks. It identifies the premises covered, transport matters, recommended bylaw content, fees and charges circumstances, and the wastewater networks to which the Plan applies.
Trade Waste Bylaw	Gives legal effect to the approach in this Plan by setting enforceable requirements, including discharge classifications, permit requirements, transport controls, monitoring obligations, offences, penalties and enforcement tools.
Trade Waste Permits	Apply the bylaw to individual dischargers, premises or carriers through site-specific requirements, conditions, limits, monitoring and reporting obligations.
Operational procedures and guidance	Support consistent implementation of the Plan, Bylaw and permits. These may include application forms, risk assessment tools, inspection procedures, monitoring plans, customer guidance and internal workflows.

This Plan does not, by itself, impose enforceable obligations on trade waste dischargers. Enforceable requirements are established through the Trade Waste Bylaw, trade waste permits and any other applicable statutory or regulatory requirements. Where there is any inconsistency between this Plan and the Trade Waste Bylaw or a trade waste permit, the bylaw or permit prevails in relation to enforceable requirements.

Strategic alignment

This working draft has been informed by the New Zealand Trade and Industrial Waters Forum Trade Waste Plan Guide Template. Any adapted guidance material has been tailored to Council's local circumstances, statutory responsibilities, wastewater networks, resource consent obligations and operational requirements.

This Plan supports Council's wider planning and operational framework, including the Long-Term Plan, Water Services Strategy, infrastructure and asset management planning, revenue and financing settings, environmental compliance obligations, resource consent requirements, health and safety obligations, growth planning and economic development objectives. It should be read alongside the Trade Waste Bylaw 2027 and associated operational procedures.

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3. Objectives of the Trade Waste Discharge Plan

The objectives of the Trade Waste Discharge Plan include the following:

Objective	Description
Environmental protection	Protect receiving environments by reducing contaminant loadings and managing trade waste that could compromise wastewater treatment performance, biosolids quality, discharge consent compliance, environmental performance standards or the health of land, freshwater and other receiving environments.
Public health and safety	Protect Council staff, contractors, wastewater operators, trade waste customers and the public from exposure to hazardous, toxic, flammable, explosive, corrosive, infectious or otherwise harmful substances.
Infrastructure protection and operational efficiency	Protect sewers, pump stations, treatment plants, monitoring equipment and related infrastructure from damage, blockage, corrosion, odour, unsafe atmospheres, treatment disruption, overloading or premature deterioration.
Regulatory compliance	Support Council's compliance with relevant legislation, regulations, environmental performance standards, resource consents, bylaws, permits and reporting obligations.
Alignment with national and regional requirements	Align trade waste management with national direction, regional plan requirements, resource consent conditions and relevant regulatory guidance.
Fair, transparent and risk-based management	Provide a clear, consistent and proportionate framework for approving, monitoring, charging and enforcing trade waste discharges.
Waste minimisation and source control	Encourage dischargers to reduce contaminants at source through good site practice, cleaner production, waste minimisation, spill prevention, appropriate storage and effective pre-treatment.
Cost recovery	Recover the reasonable costs of managing trade waste from those who discharge trade waste, including

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	administration, monitoring, treatment, network impacts and non-compliance costs.
Alignment with National Trade Waste Guidelines and Council requirements	Align trade waste management with National Trade Waste Guidelines, recognised industry good practice, Council policies, wastewater network requirements, resource consent obligations, environmental performance standards, and local operational needs. This supports a consistent, transparent and risk-based approach while allowing Council to apply requirements that reflect the capacity, condition, performance and sensitivity of its own wastewater networks and treatment plants.

4. Scope and Application of the Plan

This Plan sets out Council's approach to managing and regulating trade waste in the Manawatū District, and the discharge of trade waste into public wastewater networks.

Premises to which this Plan applies

This Plan applies to all trade waste premises in the Manawatū District that discharge, or may discharge, trade waste into the public wastewater network.

Without limitation, this Plan applies to the following types or categories of premises where they discharge, or may discharge, trade waste into a public wastewater network:

- Food premises, including cafes, restaurants, commercial kitchens, bakeries, butcheries, takeaway premises, and food manufacturing or processing;
- Dental practices and other premises using amalgam, sterilising chemicals, or other trade-related contaminants;
- Automotive, mechanical, transport, and vehicle wash premises;
- Laboratories, research facilities, and educational facilities generating trade waste;
- Health care, veterinary, aged care, and community care premises;
- Industrial, manufacturing, processing, or fabrication premises;
- Agricultural, horticultural, or primary production processing premises;
- Laundries, dry-cleaning, cleaning, and commercial washing premises;
- Waste management, liquid waste, transfer, treatment, or disposal premises;
- Premises that store, handle, treat, or discharge grease, oil, chemical, solvents, metals, sediment, leachate, contaminated water, or other substances that may affect the wastewater network or treatment system;
- Trade waste carrier and premises or vehicles associated with the collection, transport, treatment, or discharge of trade waste; and

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- Any other premises identified by Council through its trade waste risk categorisation, monitoring, investigation, permitting, or compliance processes.

Wastewater networks and approved discharge locations

This Plan applies to all wastewater infrastructure owned and operated by Manawatū District Council, including wastewater networks, pump stations, wastewater treatment plants, and associated facilities. Manawatū District Council has one approved location for the discharge of tankered or transported trade waste. Such waste may only be discharged at the Manawatū Wastewater Treatment Plant via the Council-approved reception facility. Tankered or transported trade waste must not be discharged at any other Council wastewater treatment plant.

All trade waste discharges (tankered or network discharge) must be authorised by Council and comply with the requirements of this Plan, the Trade Waste Bylaw, any applicable trade waste permit, and any operational, monitoring or sampling requirements specified by Council.

Wastewater networks to which this Plan applies

This Plan applies to public wastewater networks owned, operated, managed, or controlled by Council within the Manawatū District, including associated wastewater treatment plants, pumping stations, storage facilities, and points of discharge.

Geographic scope

This Plan applies within the Manawatū District to trade waste premises, trade waste activities, and trade waste discharges connected to, or proposing to connect to, a public wastewater network.

The Plan also applies to the transport and discharge of trade waste into a public wastewater network within the Manawatū District, including where the trade waste originates outside the district but is transported for discharge into a public wastewater network within the district.

5. Legislative and Regulatory Framework

Local Government (Water Services) Act 2025

This Plan is prepared under section 185 of the Local Government (Water Services) Act 2025. Section 185 of the Local Government (Water Services) Act 2025 requires a territorial authority to prepare and issue a Trade Waste Discharge Plan.

Mandatory content required under section 185 includes:

- Council's approach to regulating trade waste and the discharge of trade waste into wastewater networks
- The types of, or specific, trade waste premises to which the plan applies

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- Any requirements or limits relating to the transport of trade waste
- Any proposed or recommended trade waste bylaws
- The circumstances in which fees, charges, or penalties may be imposed
- The wastewater network or networks to which the plan applies.

In addition to the matters required by section 185 of the Local Government (Water Services) Act 2025, this Plan may include supporting implementation material to assist Council to manage trade waste in a clear, consistent, and risk-based way. This may include trade waste categories, operational procedures, monitoring and reporting processes, performance measures, forms, templates, schedules, and technical guidance. These matters are included to support implementation of the Plan and must be read consistently with the Act, any applicable trade waste bylaw, trade waste permits, and other regulatory requirements.

Appendix B identifies where each of these requirements is addressed in this Plan.

Water Services Act 2021 & Wastewater performance standards

Section 138 of the Water Services Act 2021 provides for The Water Services Authority (Taumata Arowai) to set national wastewater environmental performance standards. The relevant standards are currently set out in the Water Services (Wastewater Environmental Performance Standards) Regulations 2025, which establish the national requirements for publicly owned wastewater networks and wastewater treatment plants.

The 2025 regulations address four key areas including:

- Discharge of biosolids to land
- Wastewater network overflows and wastewater treatment plant bypasses
- Discharges of treated wastewater from treatment plants to water
- Discharges of treated wastewater from treatment plants to land.

The regulations include requirements relating to discharge concentration limits, biosolids application, overflows and bypasses, risk assessment, sampling, testing, monitoring, record-keeping, reporting, management plans and infrastructure upgrades.

The management of trade waste is relevant to Council's ability to comply with these standards because trade waste can affect wastewater treatment performance, contaminant loadings, biosolids quality, overflow and bypass risk, discharge quality, monitoring results, and the ability of wastewater treatment plants to meet consent conditions and environmental performance requirements.

Trade waste permits, discharge limits, monitoring, and pre-treatment requirements may be used to manage contaminants that could adversely affect wastewater treatment processes, biosolids quality or reuse, discharge compliance, overflow and bypass risk,

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receiving environments, or Council's ability to meet the national wastewater environmental performance standards.

Other regulatory considerations

Trade waste management also needs to be consistent with Council's wastewater discharge consents under the Resource Management Act 1991, any relevant regional plan rules, health and safety obligations, hazardous substance requirements, and any operational requirements that apply to the public wastewater network and wastewater treatment plants.

Council will use the Trade Waste Bylaw, trade waste permits, monitoring, and compliance processes to ensure trade waste discharges are managed in a way that supports these obligations and does not compromise wastewater network performance, treatment processes, biosolids quality, discharge quality, public health, worker safety, or environmental outcomes.

Where national standards, resource consent conditions, regional plan requirements, or other statutory requirements change, Council may review this Plan, the Trade Waste Bylaw, permit conditions, monitoring programmes, or operational procedures to ensure ongoing alignment.

Council will maintain and progressively update a current-state trade waste inventory. The inventory should record known and potential trade waste premises, trade waste carriers, industry sectors, discharge types, estimated or measured discharge volumes, pre-treatment systems, permit or approval status, monitoring results, known non-compliance, and any relevant network or treatment plant constraints.

National guidance and Council requirements

In preparing and implementing this Plan, Council may have regard to relevant national trade waste guidance, including National Trade Waste Guidelines and guidance issued by the New Zealand Trade and Industrial Waters Forum or any successor body. Council may also have regard to Council policies, wastewater plans, asset management plans, operational procedures, resource consent obligations, adopted fees and charges, health and safety requirements, and local network and treatment plant constraints.

Any such guidance does not override this Plan, the Trade Waste Bylaw, trade waste permits, resource consents, statutory requirements, or any site-specific requirement imposed by Council. Where local conditions, network capacity, treatment plant performance, health and safety, environmental compliance or operational needs require a different or more specific control, Council may apply the requirement that is necessary to manage the risk.

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6. Current State Assessment

This section summarises Council's current understanding of trade waste activities in the district and identifies the information that will be used to inform implementation of this Plan. It is intended to provide an evidence base for risk categorisation, permitting priorities, monitoring requirements, infrastructure planning, and future reviews of the Trade Waste Bylaw and this Plan.

Current trade waste inventory

Council will maintain and progressively update a current-state trade waste inventory. The inventory should record known and potential trade waste premises, trade waste carriers, industry sectors, discharge types, estimated or measured discharge volumes, pre-treatment systems, permit or approval status, monitoring results, known non-compliance, and relevant network or treatment plant constraints.

Known trade waste activities

Based on the current draft inventory, known trade waste activities that hold or are expected to require permits include approximately 75 food premises, four meat works facilities, two truck wash facilities, six commercial kitchens, dental and health-related premises, automotive and vehicle wash activities, manufacturing and processing activities, laboratories, laundries, waste management activities, and other commercial or industrial activities that discharge non-domestic wastewater to the public wastewater network.

Current approvals and controls

Current approvals and controls will be reviewed against the updated Trade Waste Bylaw and this Plan. Existing permits, approvals, exemptions or informal arrangements may need to be confirmed, varied, replaced or transitioned to ensure that permit conditions, monitoring requirements, fees and charges, and compliance expectations are clear and consistent.

Monitoring, compliance and infrastructure issues

Existing monitoring and compliance practices include site inspections, sampling, review of pre-treatment systems, investigation of incidents or complaints, assessment of discharge characteristics and follow-up of non-compliance. These practices will be formalised and prioritised through a risk-based monitoring programme.

Infrastructure capacity and constraints will be assessed alongside wastewater network and treatment plant planning. Relevant considerations include hydraulic capacity, contaminant loads, treatment performance, odour and corrosion risk, pump station impacts, storage capacity, wet weather resilience, biosolids management and the ability of the network and treatment plants to accommodate future trade waste growth.

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Key risks and issues

Key risks and issues include incomplete information on some trade waste discharges, variability in discharge characteristics, potential gaps in approvals or permit conditions, inconsistent monitoring data, risks from accidental or unauthorised discharges, constraints in parts of the wastewater network, and the need to align trade waste controls with future growth, environmental performance standards, and resource consent obligations.

7. Trade Waste Separation Programme

Background

Council is progressing a Trade Waste Separation Programme to support a more strategic, resilient and future-focused approach to managing trade waste within the district. The district's wastewater network has developed over time to service a mix of domestic, commercial and industrial users. As the District grows and diversifies, including increased interest in wet industry, the volume, strength and variability of wastewater entering the network is expected to increase.

Trade waste can contain higher-strength contaminants, variable flows, batch discharges, fats, oils and grease, chemicals, metals, suspended solids, or other substances that differ from domestic wastewater. If these discharges are not effectively managed, they can place additional pressure on shared wastewater infrastructure and treatment processes, increase operating costs, and increase the risk of non-compliance with consent or environmental performance requirements.

The programme recognises that source control and separation of higher-risk trade waste streams may provide better long-term outcomes than relying solely on treatment within a fully combined wastewater system.

Purpose of the Programme

The purpose of the Trade Waste Separation Programme is to assess and, where appropriate, implement options to separate, divert, manage, monitor, or treat trade waste streams in a way that better matches the nature and risk of those discharges. The programme is intended to support Council's wider wastewater planning, asset management, growth planning, environmental performance, and economic development objectives.

The programme will help Council identify where separation or dedicated management of trade waste may be appropriate, including for existing industrial areas, future growth areas, high-strength discharges, wet industry opportunities, or locations where the public wastewater network or treatment plant capacity may be constrained.

Programme Objectives

The objectives of the programme are to:

- support a risk-based and effects-based approach to managing trade waste;

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- improve Council's ability to monitor and control higher-risk trade waste discharges;
- reduce contaminant loads, flow variability and operational stress on shared wastewater infrastructure;
- protect wastewater treatment processes, biosolids quality, receiving environments, public health and worker safety;
- support compliance with resource consents, environmental performance standards, and other regulatory requirements;
- provide infrastructure that can support and attract appropriate wet industry in planned growth areas; and
- optimise long-term investment by considering source control, separation, targeted treatment and network upgrades together.

Strategic Opportunity

The programme provides an opportunity to move from a primarily reactive approach to a more planned and integrated approach to trade waste management. Rather than managing all trade waste impacts at the Manawatu Wastewater Treatment Plant, Council can consider whether some trade waste streams should be managed closer to source, directed to specific infrastructure, subject to different pre-treatment requirements, or monitored through dedicated systems.

This approach may provide greater control over industrial discharges, improve visibility of contaminant loads, reduce impacts on the public wastewater network, and allow infrastructure investment to be better aligned with land use planning and growth expectations.

Changing Regulatory Environment

The regulatory environment for wastewater is changing, with increasing emphasis on environmental outcomes, contaminant reduction, system performance, overflow and bypass management, biosolids quality, and demonstrable compliance. Higher-strength or variable trade waste discharges can make these outcomes more difficult and more costly to achieve if they are managed only through end-of-pipe treatment.

Trade waste separation provides a practical pathway to respond to these expectations by managing contaminants closer to their source, reducing load and variability entering treatment plants, enabling more targeted treatment solutions, and supporting more reliable compliance outcomes.

Why Planning Is Needed Now

Proactive planning is needed now because decisions made through this Plan, the Trade Waste Bylaw, the Water Services Strategy, the Long-Term Plan, asset management planning, and growth planning will influence the future capacity, resilience and affordability of wastewater services.

Key drivers for the programme include:

- growth readiness - ensuring infrastructure can accommodate appropriate wet industry and other trade waste activities in planned growth areas;

- network resilience - reducing operational stress on shared assets and improving the reliability of wastewater services;
- regulatory direction - preparing for stronger environmental performance expectations and more robust compliance obligations;
- integrated investment - aligning trade waste controls with wastewater upgrades, land use planning, and future industrial development; and
- affordability - avoiding or reducing the need for large reactive upgrades where targeted source control, separation, or pre-treatment may provide better value.

Implementation Approach

Implementation of the Trade Waste Separation Programme will be staged. Council will use trade waste inventory information, network and treatment plant performance data, growth projections, consent requirements, monitoring results, and engagement with affected dischargers to identify where separation or targeted management should be investigated further.

Implementation may include feasibility assessment, options analysis, business case development, engagement with affected industries and iwi/hapu, integration with infrastructure planning, identification of funding requirements, and development of any necessary operational procedures, permit conditions, monitoring requirements, or capital works.

Benefits of the Programme

The expected benefits of the programme include improved environmental outcomes, stronger source control, better monitoring and compliance visibility, reduced risk to wastewater infrastructure and treatment processes, improved network resilience, better alignment with growth planning, and a clearer infrastructure platform for appropriate wet industry and other trade waste-generating activities.

By taking a proactive and system-wide approach to trade waste separation, Council can support future development while protecting existing infrastructure, public health, worker safety, receiving environments, and the long-term affordability of wastewater services.

The programme does not replace the need for trade waste permits, pre-treatment, monitoring, or compliance controls. Instead, it provides an additional strategic tool to help Council determine how trade waste should be managed across the network over time.

8. Trade Waste Bylaw – Assessment and Recommendations

Purpose:

This section sets out Council's proposal and recommendation to replace the existing Trade Waste Bylaw 2022 with a new Trade Waste Bylaw 2027 and to support the implementation of this Trade Waste Discharge Plan. This Plan proposes that Council

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make the Trade Waste Bylaw 2027 under sections 187 and 258 of the Local Government (Water Services) Act 2025 to implement this Plan.

The Trade Waste Bylaw will give legal effect to the approach set out in this Plan by specifying the activities that may be undertaken under a trade waste permit, the activities that require a trade waste permit, activities that may be restricted or prohibited, and the processes Council will use to issue, review, vary, revoke, transfer, administer and enforce trade waste permits.

The bylaw will be an important regulatory tool for protecting the wastewater network, wastewater treatment processes, public health and safety, the environment, and Council's ability to meet its statutory and resource consent obligations.

Options considered

Option	Description	Assessment
Option 1: Retain the current bylaw	Continue to rely on the current Trade Waste Bylaw with minimal change.	This would provide continuity but would not fully align with the Local Government (Water Services) Act 2025, the new role of the Trade Waste Discharge Plan, updated review and appeal pathways, carrier controls or expanded permit condition powers. This is not recommended.
Option 2: Amend the current bylaw and adopt this Plan	Amend the existing bylaw to address the main legislative gaps and adopt this Plan.	This would address some compliance requirements but may leave the framework less clear because the current bylaw was prepared under the previous statutory structure. It may also be harder for dischargers, staff and authorised officers to understand the relationship between the Plan, Bylaw and permits. This is not the preferred option.
Option 3: Replace the current bylaw and adopt this Plan	Adopt a new Trade Waste Bylaw 2027 alongside this Plan.	This provides the clearest and most coherent framework. It allows Council to align with the Act, separate policy direction from enforceable requirements,

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		modernise permits, monitoring and enforcement, clarify transport requirements, and create clear transition arrangements. This is the recommended option.

Recommended Approach to the Trade Waste Bylaw

Council recommends that the Trade Waste Bylaw 2022 be replaced (Option 3) with a new Trade Waste Bylaw 2027 to align with the Local Government (Water Services) Act 2025 and to support the effective implementation of this Plan.

The new bylaw should provide a clear, enforceable framework for the management of trade waste across the district. It should also support a risk-based and effects-based approach to regulation, where requirements are proportionate to the nature, volume, characteristics and potential impacts of the trade waste discharge.

Matters the bylaw should address

The new bylaw should address the following matters:

- The activities that may be performed by a person who holds a trade waste permit
- The activities that a person must not perform without a trade waste permit
- The activities that will be subject to restrictions under the trade waste permit
- Activities that are prohibited (for which a trade waste permit will not be issued)
- The Council's intended approach
  - ❖ to issuing trade waste permits over a five-year period, including the approach to classes of trade waste, trade waste premises, and trade waste carriers,
  - ❖ determining the requirements, conditions and limits that apply to different classes of trade waste under the trade waste permits
  - ❖ determining the qualification, training and supervision requirements that are to apply to persons who are granted trade waste permits
  - ❖ determining the considerations that are to apply when the Council sets fees or charges in relation to trade waste permits
- that an owner or operator of a trade waste premises who wishes to discharge trade waste into a wastewater network must
  - ❖ apply for a trade waste permit to discharge the trade waste; and
  - ❖ pay a fee with the application
- requirements for a trade waste permit to be reviewed, varied, revoked, or transferred
- the process by which the Council will issue trade waste permits

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- the role of the authorised officers in administration or enforcement;

Permit conditions may include discharge limits, pre-treatment requirements, monitoring and reporting obligations, maintenance requirements, notification requirements, record-keeping obligations, training requirements, audit requirements, restrictions on discharge timing or volume, and any other conditions necessary to manage risks.

Training or supervision requirements may be imposed where Council considers they are necessary to manage risks associated with the discharge, prevent accidental or unauthorised discharges, ensure correct operation of equipment, or support compliance with permit conditions. The bylaw should also enable Council to recover reasonable costs associated with non-compliance, additional monitoring, investigation, enforcement action, damage to infrastructure or remedial works.

Council recommends that the Trade Waste Bylaw include provisions addressing the matters outlined in this section. This will ensure the bylaw provides a clear, enforceable and fit-for-purpose framework for managing trade waste, supports the implementation of this Plan, and aligns Council's trade waste controls with the requirements of the Local Government (Water Services) Act 2025. The bylaw should be developed and consulted on alongside this Plan so that the policy approach, regulatory requirements and implementation framework are aligned.

9. Trade Waste Management, Monitoring and Enforcement Framework

Trade waste will be regulated through a combination of the Trade Waste Bylaw, trade waste permits, risk categorisation, monitoring and reporting, education, compliance management and enforcement responses. The approach will be proportionate, evidence-based and focused on managing risk to people, infrastructure, treatment processes and the environment.

Appendix C summarises the trade waste categories and their general management approach. The classification and requirements applying to an individual discharge will be determined in accordance with the Trade Waste Bylaw."

Risk categorisation

Risk category	Description	Typical management approach
Low risk	Low volumes, predictable discharge characteristics, low contaminant risk and good compliance history.	Standard requirements, education, periodic review, targeted inspections where

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		needed and lower-frequency monitoring.
Medium risk	Moderate volumes or sector-specific risks, pre-treatment requirements, some variability or potential to affect network or treatment performance if not managed.	Standard or tailored permit conditions, periodic monitoring, inspection of pre-treatment systems and compliance follow-up.
High risk	High volume, high contaminant load, hazardous substances, variable batch discharge, poor compliance history, tankered waste, or potential to affect treatment performance, worker safety, biosolids quality or environmental compliance.	Detailed permit conditions, regular monitoring, sampling, reporting, audits, contingency requirements and active compliance oversight.

Council will consider the factors outlined in Appendix D when assessing a discharge's risk category and determining appropriate permit conditions, monitoring requirements and compliance priorities.

Indicative Conditional Trade Waste Activities

Certain industries and activities are more likely to generate trade waste that requires assessment and management through a Conditional Trade Waste Permit.

Appendix H provides an indicative list of industries, activities and sources of discharge that may commonly be classified as Conditional Trade Waste, together with examples of typical pre-treatment or management controls that may be appropriate.

The list in Appendix H is not exhaustive and inclusion of an activity does not automatically determine the classification of a discharge. Classification will depend on the actual nature, volume, characteristics and risks associated with the trade waste discharge and the requirements of the Trade Waste Bylaw.

The pre-treatment and management controls identified in Appendix H are indicative only. The actual requirements applying to a discharge will be determined by Council having regard to the nature, volume and characteristics of the trade waste, the risks associated with the discharge, the capacity and operation of the wastewater network and treatment system, and the requirements of any applicable Trade Waste Permit.

Council may require different or additional pre-treatment, monitoring or management controls where necessary.

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Where there is uncertainty about the classification of a discharge or the pre-treatment requirements that may apply, the discharger should contact Council's Trade Waste Officer.

Application information

An application for a trade waste permit, approval or review must include the information Council requires to assess the nature, volume, quality, timing and risk of the proposed discharge. The information required may include, without limitation:

- Applicant, owner, occupier and operator details, including contact details and emergency contact details;
- Business trading name, activity description, hours of operation and relevant processes that generate trade waste;
- Estimated and, where available, measured discharge volumes, flow rates, peak flows, batch discharge volumes and discharge timing;
- Expected wastewater quality, contaminants, hazardous substances, chemicals, cleaning products, fats, oils, grease, solids, metals, solvents, temperature, pH, BOD, COD and any other relevant characteristics;
- Site drainage plans showing trade waste drainage, stormwater drainage, private sewers, pre-treatment systems, monitoring points and the proposed point of discharge;
- Details of pre-treatment systems, maintenance arrangements, cleanout frequencies, servicing contracts and records;
- Waste management plans, spill management plans, contingency procedures, staff training arrangements, monitoring proposals and any other information Council reasonably requires.

Trade waste permits will authorise the discharge of trade waste to the wastewater network and specify conditions tailored to the discharge. Permits may apply to premises, dischargers, carriers, specific discharge points, specific classes of trade waste or any combination of these, as provided in the Trade Waste Bylaw.

Appendix F provides a checklist to assist applicants in preparing their applications. The information required for an individual application will depend on the nature and risk of the proposed discharge.

Permit conditions

Permit requirements, conditions and limits will be set in accordance with the Local Government (Water Services) Act 2025, the Trade Waste Bylaw and this Plan. Permit conditions will address contaminant limits, mass limits, maximum flow, discharge timing, discharge points, pre-treatment requirements, equipment maintenance, monitoring, sampling, reporting, record keeping, staff training, supervision, emergency response, spill management, notification duties, audits, fees and charges, and any other matter necessary to manage risk.

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Monitoring and reporting

Council will implement monitoring and reporting requirements to assess compliance with the bylaw and permits. This may include self-monitoring by dischargers, regular reporting of discharge quality and volume, Council-led sampling, site inspections, audits, review of pre-treatment maintenance records, incident reporting and analysis of trends in contaminant loadings.

Compliance management

Council will assess compliance through a structured and consistent approach. Compliance information will be recorded and used to inform future permitting decisions, risk categories, inspection frequency, monitoring requirements, infrastructure planning and enforcement responses.

Enforcement framework

Council's compliance and enforcement response will be guided by proportionality, consistency, transparency, timeliness, evidence, risk, actual and potential effects, compliance history and the need to deter future non-compliance. Council may escalate or bypass lower-level responses where the incident or non-compliance presents a significant risk to public health, worker safety, the wastewater network, treatment processes, receiving environments, resource consent compliance or Council assets.

Council will apply a graduated and proportionate enforcement approach. The response to non-compliance will take into account the seriousness of the breach, actual or potential effects, intent, compliance history, cooperation, whether the matter was promptly reported, and the need to deter future non-compliance.

Response level	Examples of tools
Education and support	Advice, guidance, reminders, site meetings, improvement recommendations and voluntary action plans.
Corrective action	Written directions, written warnings, required corrective works, increased monitoring, permit review or variation, and recovery of reasonable costs.
Formal enforcement	Infringement notices or penalties where authorised, compliance orders, suspension or revocation of permits, restriction or disconnection from the network, remedial action and prosecution where appropriate.

A discharger, permit holder, trade waste carrier or person in control of a trade waste activity must immediately notify Council of any spill, accidental discharge, unintended

discharge, unauthorised discharge, non-compliant discharge, bypass, equipment failure, pre-treatment failure, or other incident that may affect the wastewater network, treatment processes, workers, the public, public health, biosolids, receiving environments or Council's compliance obligations.

The person responsible must take all practicable steps to stop, contain and mitigate the discharge; prevent entry to stormwater, land or any unauthorised location; protect people and property; follow any Council direction; arrange clean-up and disposal; and provide information or a written incident report if required. Council may require corrective actions, additional monitoring, review of site procedures, staff training, changes to pre-treatment, permit variation, cost recovery or enforcement action depending on the circumstances.

The bylaw and permits should require immediate notification to Council of any accidental, unintended, unauthorised or non-compliant discharge that may affect the wastewater network, treatment processes, workers, the public or the environment. Permit holders may be required to take immediate steps to stop or contain the discharge, mitigate effects, provide information, undertake clean-up or remedial works, and review procedures to prevent recurrence.

Continuous Improvement and Adaptive Management

Council will adopt an adaptive management approach to trade waste regulation. Information obtained through monitoring and compliance activities will be used to:

- Review and refine permit conditions
- Update categorisation frameworks
- Inform infrastructure planning and investment decisions
- Improve overall trade waste management practices

10. Wastewater Quality and Monitoring Requirements

Council will use wastewater quality limits, monitoring, sampling, inspections, self-monitoring and reporting to assess whether trade waste complies with the Trade Waste Bylaw, any trade waste permit, this Plan and any relevant operational requirement. Monitoring requirements will be proportionate to the risk of the discharge and may be adjusted over time based on compliance history, discharge variability, network impacts, treatment plant performance, incident history and changes in activity.

Key parameters may include pH, temperature, suspended solids, oil and grease, BOD, COD, nutrients, metals, solvents, toxic substances, hazardous substances, flow, volume and any other characteristic relevant to the discharge or receiving wastewater network. Council may require laboratory testing, composite or grab sampling, installation of meters or monitoring equipment, self-monitoring reports, maintenance records, discharge logs and independent verification where necessary.

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11. Pre-Treatment and Operational Controls

Council may require trade waste to be pre-treated before discharge where pre-treatment is necessary to protect the public wastewater network, wastewater treatment processes, workers, the public, biosolids quality, receiving environments or Council's compliance obligations. Pre-treatment may include grease traps, oil and grit separators, solids interceptors, neutralisation systems, chemical dosing systems, filtration systems, screening, settlement, cooling, flow balancing, containment or any other system approved by Council.

Pre-treatment systems must be appropriately designed, installed, operated, maintained, serviced and cleaned. Council may require evidence of design suitability, installation approvals, maintenance schedules, servicing contracts, cleanout records, waste disposal records, staff training, inspection access and performance monitoring. Failure to install, operate or maintain required pre-treatment may be treated as non-compliance with the Trade Waste Bylaw or permit conditions.

12. Business Risk Assessment and Management Controls

Council may require a discharger, permit holder or trade waste carrier to prepare and maintain a site-specific business risk assessment or discharge management plan. The assessment should identify contaminants and processes that may affect the wastewater network, treatment plant, workers, the public, public health, biosolids, receiving environments or compliance obligations. It should also identify mitigation measures, maintenance schedules, monitoring, contingency procedures, spill response, staff training and responsibilities.

13. Information, Monitoring and Record Keeping

Council may require dischargers, permit holders and trade waste carriers to keep and provide records relating to trade waste generation, pre-treatment, monitoring, sampling, waste disposal, chemical use, maintenance, cleanouts, incidents, training, WasteTrack entries, carrier details, source information, volumes, discharge timing, customer details and chain-of-custody information. Records must be accurate, current, retained for the period required by Council and made available to Council on request.

15. Transport of Trade Waste

Purpose

This section addresses requirements and limits relating to the transport of trade waste for discharge into the public wastewater network. Detailed enforceable requirements will be specified in the Trade Waste Bylaw, trade waste permits and operational procedures.

Council will manage tankered and transported trade waste through a combination of approved discharge locations, WasteTrack recording, carrier verification, and compliance checks.

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In accordance with the Bylaw, a trade waste carrier must not discharge tankered or transported trade waste to Council's public wastewater network unless:

a. the discharge is made at an Approved Site or other discharge point approved by Council
b. the carrier has completed and submitted all required WasteTrack information for the load, including the source, type, volume, carrier/operator details, vehicle details, and disposal location unless Council has approved another recording process in writing; and
c. the carrier complies with any applicable trade waste bylaw, trade waste permit, site access condition, operational instruction, or other requirement imposed by Council.

Council may refuse to accept tankered or transported trade waste where the required WasteTrack record has not been completed to Council's satisfaction.

Transport requirements and limits

- Trade waste may only be transported and discharged by a person who holds any required trade waste carrier permit or other approval required by the Trade Waste Bylaw.
- Tankered or transported trade waste may only be discharged at a discharge point approved by Council for that purpose.
- Council may limit the type, volume, strength, contaminant load, timing, frequency or source of transported trade waste accepted at any discharge point.
- Carriers may be required to provide source information, manifests, waste descriptions, volumes, sampling results, customer details, disposal records and chain-of-custody records.
- Council may require carriers to use approved equipment, fittings, backflow prevention, containment, spill controls and identification systems.
- Council may refuse or restrict acceptance of transported trade waste where the waste is prohibited, inadequately characterised, not permitted, incompatible with network or treatment capacity, or presents unacceptable risk.
- Council will require through the Bylaw any applicable permit or approval that carriers discharge trade waste only to authorised wastewater discharge locations.
- Discharge to stormwater, land, unauthorised manholes, unauthorised sewers or any other unauthorised location will not be permitted. Council will require carriers, as a condition of any applicable permit or approval, to promptly notify Council of any spill, accidental discharge, non-compliant load or other incident that may affect the wastewater network, public health, worker safety or the environment.

Carrier permits and records

Tankered and transported trade waste includes, without limitation, septage, port-a-loo waste, grease trap waste, industrial liquid waste, contaminated water, leachate, sludge,

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wash water and any other liquid waste transported by vehicle for discharge into the public wastewater network. Council may require approval before discharge, evidence of waste source and characteristics, where required, sampling results, spill management arrangements and compliance with approved discharge site procedures.

Council will not accept tankered or transported trade waste unless the carrier has completed all required WasteTrack records.

Carrier permits may include conditions relating to approved waste types, approved discharge points, maximum volumes, discharge times, notification requirements, sampling, reporting, vehicle identification, training, supervision, spill response, record keeping and audit access. Council may audit carrier records and reconcile those records with discharge data, billing information and monitoring results.

16. Infrastructure and Capacity Considerations

Trade waste management must be aligned with the capacity, condition and performance of the public wastewater network and wastewater treatment plants. Council will use trade waste information to support asset management planning, infrastructure investment, growth planning, network modelling, treatment plant planning and consent compliance.

Infrastructure matters considered

- hydraulic capacity in sewers, pump stations, storage facilities and treatment plants;
- contaminant loads and the ability of treatment processes to manage those loads;
- odour, corrosion and unsafe atmosphere risks;
- fat, oil, grease, sediment and grit impacts on network performance;
- wet weather resilience, overflow and bypass risks;
- biosolids treatment, quality, handling, disposal or reuse;
- resource consent conditions and environmental performance requirements;
- industrial land use planning and future wet industry opportunities;
- network and treatment plant upgrade requirements; and
- the cumulative effects of multiple dischargers on the same network or treatment plant.

Capacity constraints and growth

Council may also decline, restrict or defer a trade waste discharge where there is insufficient network or treatment capacity or where the discharge would compromise compliance obligations.

This includes considering the wastewater networks covered by this Plan, as identified in section 5, and the potential impacts of trade waste on those networks, associated pump stations, storage assets and wastewater treatment plants. Council will assess trade waste discharges having regard to current capacity constraints and risks, future growth, zoning and industrial land use planning, and any relevant asset management plans. Where required, Council may identify necessary infrastructure upgrades, operational

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changes or changes to discharge management practices through the asset management planning process.

Where trade waste may affect infrastructure capacity or treatment performance, Council may use permit conditions, discharge limits, pre-treatment requirements, timing restrictions, monitoring, staged approvals, development conditions, infrastructure planning or separation options to manage risk. Council may also decline, restrict or defer a trade waste discharge where there is insufficient network or treatment capacity, where required upgrades or operational changes have not been provided for, or where the discharge would compromise Council's compliance obligations.

17 Fees and Charges

Fees and charges will be set in the Council's Schedule of Fees and Charges, in accordance with Council's Revenue and Financing Policy, the Trade Waste Bylaw and any applicable statutory requirements. Fees, charges and penalty fees will be imposed only where authorised by legislation, the Trade Waste Bylaw, a Trade Waste Permit, and Council's adopted fees and charges.

Circumstances in which fees and charges may apply

- processing trade waste permit applications, renewals, transfers, variations and reviews;
- administration of the trade waste system;
- monitoring, inspections, sampling, analysis, audits and reporting;
- discharge of trade waste by volume, strength, contaminant load, risk category or other approved charging methodology;
- use of approved discharge points for tankered or transported trade waste;
- review of discharge management plans, pre-treatment systems or technical information;
- re-inspections, additional monitoring, investigation or enforcement activity arising from non-compliance;
- costs associated with damage to infrastructure, remedial works, clean-up or emergency response;
- penalty fees or charges for permit non-compliance where authorised by the bylaw and permit; and
- any other reasonable costs authorised by legislation, the bylaw, permit conditions or Council's adopted fees and charges.

Penalty fees and non-compliance costs

Penalty fees may be imposed where authorised by the Trade Waste Bylaw, provided for in a trade waste permit and applicable legislation and set out in Council's adopted Schedule of Fees and Charges. Circumstances may include failure to comply with permit conditions, failure to provide information or records, failure to maintain pre-treatment

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systems, unauthorised discharge, discharge at an unauthorised location, exceedance of limits, failure to notify accidental or non-compliant discharges, or other non-compliance that creates additional cost or risk.

Charging methodology

Fees, charges and cost recovery may also apply to downstream blockages, build-up, network cleaning, network repairs, removal or decommissioning of treatment systems where required, emergency response actions, investigation of unauthorised discharges, additional treatment costs, disposal costs, re-inspections, audits, laboratory testing, contractor costs, legal costs where recoverable, and any other reasonable costs caused or contributed to by the discharge or non-compliance.

The methodology for calculating trade waste charges may include fixed application or administration fees, actual and reasonable costs, volume-based charges, strength or load-based charges, monitoring and laboratory costs, risk-based monitoring costs, carrier permit charges, discharge point charges and non-compliance cost recovery. Specific fee levels will be set through Council's adopted fees and charges process.

18. Stakeholder Engagement

Council will engage with affected and interested parties as part of developing, consulting on and implementing this Plan and the Trade Waste Bylaw. Consultation on this Plan and the proposed Trade Waste Bylaw will be undertaken together in accordance with sections 186 and 188 of the Local Government (Water Services) Act 2025 and the process applied through section 258(7).

Key stakeholders

- known trade waste dischargers and permit holders;
- trade waste carriers and tankered waste operators;
- iwi and hapū;
- Horizons Regional Council;
- wastewater operations, treatment, asset management, planning, environmental health and compliance staff;
- business associations and high-risk industry sectors;
- developers and businesses associated with future industrial or wet industry growth areas;
- laboratories, contractors and service providers involved in monitoring or pre-treatment; and
- the wider community where trade waste matters affect public wastewater services, public health, environmental outcomes or charges.

Engagement approach

Engagement will include formal consultation on this Plan and the Trade Waste Bylaw, targeted engagement with affected dischargers and carriers, internal workshops,

technical discussions with wastewater operations and compliance staff, iwi/hapū engagement, and ongoing communication during implementation. Feedback will be used to refine permit transition arrangements, customer guidance, operational processes, fees and charges, risk categories and monitoring priorities.

Key themes to test through consultation

- clarity of the relationship between the Plan, Bylaw and permits;
- practicality of proposed permit categories and transition arrangements;
- risk-based monitoring and compliance expectations;
- transported and tankered trade waste requirements;
- fees, charges and cost recovery;
- impacts on businesses and operational feasibility;
- roles and responsibilities of Council, Manawatū Water Services, dischargers and carriers; and
- implementation timing and support required for affected dischargers.

Summary of engagement undertaken

(to be completed after consultation)

Key themes and issues raised

(to be completed after consultation)

How feedback has been incorporated

(to be completed after consultation)

19. Implementation Plan

The Trade Waste Discharge Plan and Trade Waste Bylaw are intended to be consulted on and adopted alongside the Long Term Plan and Water Services Strategy, with adoption proposed for June 2027. Implementation will be staged to support a clear transition for existing permit holders, new applicants, trade waste carriers, Council staff and Manawatū Water Services.

Phase	Actions	Indicative timing

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1. Preparation	Complete current-state inventory; confirm legislative gap analysis; confirm risk categorisation framework; prepare draft bylaw, permit templates, application forms, monitoring procedures and customer guidance.	Before consultation
2. Consultation	Consult on the Plan and Trade Waste Bylaw alongside the Long Term Plan and Water Services Strategy; engage with affected dischargers, carriers, iwi/hapū, regulators and internal teams.	
3. Hearings and deliberations	Consider submissions; refine Plan, Bylaw, fees and implementation approach; confirm legal review, delegations and transitional arrangements.	
4. Adoption	Adopt the Trade Waste Discharge Plan and Trade Waste Bylaw; adopt or confirm associated fees and charges where required.	
5. Transition	Notify permit holders and known dischargers; transition existing permits and approvals; prioritise high-risk discharges and carriers; update records and systems.	0-12 months after adoption
6. Full implementation	Complete permit reviews and new permit issue programme; implement risk-based monitoring; embed compliance procedures; progress Trade Waste Separation Programme investigations.	1-5 years after adoption

Appendix G identifies the matters to be confirmed before final adoption, including bylaw alignment, fees and charges, delegations, transitional arrangements and implementation readiness.

Roles and responsibilities

Role	Responsibilities
Council	Adopt the Plan and Bylaw; set fees and charges; make key policy decisions; ensure lawful delegations and authorisations are in place; monitor overall performance. The power to make, amend or revoke the Bylaw remains with Council

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Manawatū Water Services	Administer the Plan and bylaw on Council's behalf; assess applications; undertake monitoring and inspections; maintain records; provide technical advice; support compliance responses.
Authorised officers	Exercise delegated or authorised monitoring, inspection, compliance and enforcement functions in accordance with the bylaw and legislation.
Trade waste dischargers and permit holders	Understand and comply with the bylaw and permit conditions; operate pre-treatment systems; monitor and report where required; notify incidents; pay fees and charges.
Trade waste carriers	Hold required permits; use approved discharge points; maintain records; comply with transport, discharge, notification and reporting requirements.

Resourcing and dependencies

Implementation will require staff capability, clear processes, record systems, monitoring budgets, laboratory and contractor support, customer communications, legal review, delegations, integration with fees and charges, and alignment with infrastructure planning. Dependencies include bylaw adoption, final permit templates, system changes, asset planning information, environmental performance requirements and availability of operational data.

Appendix E identifies the operational documents to be developed or updated to support consistent implementation of this Plan and the Trade Waste Bylaw.

20. Monitoring, Review, and Continuous Improvement

The performance indicators will include number of active permits by risk category, percentage of high-risk premises monitored on schedule, number and severity of non-compliance events, response time to accidental discharges, trend in contaminant loadings, cost recovery performance, and progress on permit renewals and reviews.

Measure	**Purpose**
Number of active permits by risk category	Track coverage of known trade waste dischargers and the implementation of risk-based permitting.

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Percentage of high-risk premises monitored on schedule	Measure whether monitoring effort is focused on higher-risk discharges.
Number and severity of non-compliance events	Track compliance trends and identify sectors or premises requiring intervention.
Response time to accidental or unauthorised discharges	Assess readiness and effectiveness of incident response.
Trends in contaminant loadings and discharge characteristics	Assess whether source control and permit conditions are reducing risk to the network and treatment plants.
Permit review and renewal progress	Track progress on the five-year permit transition and review programme.
Cost recovery performance	Assess whether trade waste fees and charges are recovering reasonable costs.
Progress on Trade Waste Separation Programme investigations	Track implementation of strategic separation or targeted management opportunities.

Reporting

Manawatū Water Services will maintain trade waste records and provide periodic reporting to Council as required. Reporting may cover permit numbers, risk categories, monitoring completion, non-compliance, incidents, enforcement actions, fees and charges, significant discharges, infrastructure issues and progress against implementation actions.

Review cycle

This Plan will be reviewed periodically to ensure it remains fit for purpose. A full review should occur at least every ten years, or earlier if required by legislative change, environmental performance standards, resource consent changes, significant infrastructure constraints, growth pressures, monitoring results or compliance trends. Operational procedures, permit templates, risk categories and monitoring programmes may be reviewed more frequently.

Continuous improvement

Council will use monitoring, reporting, compliance outcomes, customer feedback, infrastructure performance data and regulatory changes to improve trade waste management over time. Continuous improvement may include refining permit

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conditions, updating risk categories, improving customer guidance, changing monitoring frequency, revising fees and charges, progressing separation opportunities or updating the bylaw and Plan.

21. Appendices

Appendix A

a) Definitions and Interpretation

The definitions below are provided for the purposes of both this Plan and the Trade Waste Bylaw 2027. While some of these definitions may not be used within this document, they have been included to ensure consistency and clarity between the Bylaw and the Plan.

Term	**Definition**
Act	Means the Local Government (Water Services) Act 2025
Authorised officer	Means a person authorised by Council to exercise functions, duties, or powers relating to trade waste management, monitoring, compliance or enforcement
Access Point	means a place where a Private Sewer can be accessed for inspection (including sampling or measurement), cleaning or maintenance. *Explanatory Note: Access Point(s) shall be provided in accordance with the New Zealand Building Code.*
Approved	means approved in writing by the Council or by any Council Officer authorised for that purpose.

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Acceptable Discharge	means a Permitted Trade Waste Discharge into the Public Wastewater Network.
Approval	includes all permits, consents, certificates or authorities granted under Bylaws.
Approved Site	means a monitored site where Tankered Waste can be discharged into the Public Wastewater Network.
Biosolids	means sewage sludge derived from a wastewater treatment plant that has been treated and/or stabilised to the extent that it is able to be safely and beneficially applied to land, but does not include products derived solely from industrial wastewater treatment plants.
Bylaw	means any operative Bylaw of the Council.
Characteristic or Characteristics	means any of the physical or chemical features of Trade Waste described in Schedules 1 and 2 of the Bylaw.
Cleaner Production	means the implementation on Trade Waste Premises of effective operations, methods and processes appropriate to the goal of reducing or eliminating the quantity and toxicity of wastes produced on Trade Waste Premises.
Condensing Water or Cooling Water	means any water used in any trade, industry, or commercial process or operation in such a manner that it does not take up matter into solution or suspension. *Explanatory note: condensate water from floor drains in chillers or freezers is likely to contain Contaminants that require treatment*.
Conditional Trade Waste	means a Trade Waste which is not a Permitted Trade Waste, or a Prohibited Trade Waste, and which must not be discharged into the Public Wastewater Network except in accordance with a Permit.
Contaminant	means any substance (including gases, odorous compounds, liquids, solids and micro-organisms) or energy (excluding noise) or heat that, either by itself or in combination with the same, similar, or other substances, energy or heat –

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	a) when discharged into water, changes or is likely to change the physical, chemical or biological condition of the water; or b) when discharged onto or into land or air, changes or is likely to change the physical, chemical, or biological condition of the land or air onto or into which it is discharged; *Explanatory note – this definition is the same as the definition of "contaminant" in the Resource Management Act 1991, meaning that any substance that is a contaminant under that regime will also be one for the purposes of the Bylaw*.
Council	means Manawatū District Council. Where a function, duty, or power under this Bylaw is lawfully delegated or authorised, a reference to Council includes the person or body acting within the scope of that delegation or authorisation.
Council Officer	means any person who is appointed or authorised, in writing, by the Chief Executive or by the Council to act on the Council's behalf, and includes a Custodian.
Compliance Officer	means a compliance officer appointed under section 278 of the Local Government (Water Services) Act 2025.
Discharge	Means the direct or indirect introduction, release, disposal, or conveyance of any waste, wastewater, contaminant, or substance into a Public Wastewater Network (or the Public Stormwater Network, land, water, or the environment where the context requires).
Discharge point	Means the point at which trade waste enters a wastewater network, or any other point approved by Council for the discharge, sampling, monitoring, or measurement of trade waste.
Discharger	Means any person who discharges, proposes to discharge, causes, permits, or allows trade waste to be discharged into a wastewater network
Discharge Management Plan	means a plan for the monitoring, programming and controlling of Trade Waste operations for a Premises that

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	has been incorporated into a Permit through conditions. It may, but is not required to, include provision for Cleaner Production, waste minimisation, monitoring and recording of discharges, contingency management procedures, emergency management procedures for unexpected or unscheduled events, and any relevant industry code of practice.
Disconnect or Disconnection	means the sealing off of any of Council's water services, utilities, drains or sewers to prevent use by a person or Premises.
District	Means the district of the Manawatū District Council.
Domestic wastewater	means Wastewater discharged from sanitary fixtures or appliances in Premises that are used solely for residential activities, or waste of the same character discharged from other Premises with maximum strength parameters as follows: b) Biological dissolved oxygen (BOD5) 350g/m3 c) Total suspended solids (TSS) 400g/m3 d) Ammonia (NH4) 60g/m3 e) Phosphate (PO4) 30g/m3; and Total Kjeldahl Nitrogen (TKN) 65g/m3.
Food Premises	means any Premises, Home-based Business, Mobile Trade Premises, or other place where food is manufactured, prepared, processed, cooked, reheated, packed, stored, handled, sold, or otherwise supplied in the course of a business, trade, or commercial activity.
Grease Trap	means a device that allows kitchen and/or food production Wastewater to cool, and the grease to separate from Wastewater.
Hazardous Substances	has the meaning given to it in the Hazardous Substances and New Organisms Act 1996.
Home-based Business	Means any business, trade, commercial, food preparation, manufacturing, processing, service, or similar activity carried out from a residential premises, where Wastewater

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	or Trade Waste is or may be discharged to the Public Wastewater Network.
Independent Analyst	means an accredited test laboratory for the purposes of sampling and testing in accordance with the requirements of the Bylaw.
Infringement fee	Infringement fee has the meaning given in section 256 of the Local Government (Water Services) Act 2025.
Infringement Offence	Infringement offence means an offence identified in the Bylaw as an infringement offence in accordance with sections 256 and 269 of the Local Government (Water Services) Act 2025.
Liquid and Hazardous Wastes Code of Practice	means the industry code of practice for liquid and hazardous waste operations in New Zealand, including any subsequent edition, amendment or replacement of that code.
Mass Limit	means the total mass of any Characteristic that may be discharged to the Public Wastewater Network over any twenty-four hour period from any single Point of Discharge or collectively from several points of discharge.
Monitoring	Means the observation, inspection, measurement, sampling, testing, analysis, recording, reporting, or assessment of a trade waste discharge, premises, process, pre-treatment system or related activity.
Maximum Concentration	means the instantaneous peak concentration of any Characteristic that may be discharged at any instant in time.
Meter	means any device able to be calibrated and used to measure the flow, volume or quality of any discharge of Wastewater and any ancillary equipment, devices and fitting; and **metering** means the use of such a device or devices.
Mobile Trade Premises	means any vehicle, trailer, caravan, stall, temporary structure, or other mobile or temporary facility used for any business, trade, commercial, food preparation, manufacturing, processing, service, or similar activity,

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	where Wastewater or Trade Waste is generated, stored, transported, discharged, or disposed of.
New Zealand Waste Strategy	means a programme established by the Ministry for the Environment that requires effective waste management, recycling and reuse of waste.
NZS 4304	means the edition, complete with any amendments, of New Zealand Standard 4304:2002 Management of Healthcare Waste that was in force at the time the Bylaw was made.
Occupier	means a person occupying a Trade Waste Premises that is connected to the Public Wastewater Network.
Owner	as applied to any Premises, means any person for the time being entitled to receive the rent for such Premises, or who would be so entitled if it were let to a tenant at a rack rent, and where any such person is absent from New Zealand, includes their attorney or Agent.
Permit	means a Trade Waste Permit
Permit Holder	means the person who has obtained a Permit, and includes any person acting with the express or implied consent of the Permit Holder and any licensee of the Permit Holder.
Permitted Trade Waste	means a Trade Waste that complies with all of the requirements for any individual Characteristic or combination of Characteristics set out in Schedule 1 of the Bylaw.
Point of Discharge	means the point at which trade waste enters the Public Wastewater Network, being the boundary between the Public Wastewater Network and a Private Sewer, unless Council approves another location for the purposes of discharge, sampling, monitoring, testing, measurement, or as specified in a Trade Waste Permit.
Pre-treatment	means any processing of Trade Waste designed to reduce or vary any Characteristic before discharge to the Public Wastewater Network in order to ensure the Trade Waste complies with the Bylaw or a Permit issued under the Bylaw.

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Premises	means any land, building, or cellar, or part thereof, that is separately occupied, and includes all land that is accessory to the occupation of that land, building, or cellar.
Private Sewer	means that section of a privately-owned pipe or drainage network between the Dwelling or Premises through which wastewater flows up to the Point of Discharge to the Public Wastewater Network.
Prohibited Trade Waste	means a Trade Waste that contains or is likely to contain Characteristics that are prohibited or are present in concentrations that are prohibited as set out in Schedule 2 of the Bylaw.
Public Place	includes every Road, Beach, Reserve, Footpath, accessway, or thoroughfare open to or used by the public; and every place to which the public has access, whether as of right or not.
Public Stormwater	means any stormwater system, network, asset or infrastructure that is owned, operated, managed or controlled by Council, including pipes, drains, culverts, channels, swales, detention or retention facilities, treatment devices, inlets, outlets and associated structures used for the collection, conveyance, treatment, storage or discharge of stormwater.
Public Wastewater Network	means a network used for the collection, treatment, storage, transmission (including metering), or discharge of wastewater from consumers, and which is owned by, or operated by, for, or on behalf of, the Council.
Schedule of Fees and Charges	means a schedule published by the Council from time to time that sets out the fees and charges applying to particular activities or services by Council and for which it is authorised to set fees and charges.
Sewer	means any pipework that conveys Wastewater (including Trade Waste), whether privately owned or as part of the Public Wastewater Network.
Sludge	means the material settled and removed from Wastewater during the treatment process.

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Significant change	Means any change to a premises, process, activity, discharge, volume, contaminant loading, pre-treatment system, ownership, operation, or risk profile that may affect the nature, quantity, quality, timing, or risk of trade waste discharged to the wastewater network.
Stormwater	means all rainfall and surface run-off water resulting from precipitation events (for example drizzle, mist, rain, hail or snow), including rainfall and run-off water from constructed impervious areas such as roads, pavement, roofs, and urban areas.
Structure	means any building, equipment, device or other facilities made by people and which is fixed, permanently or temporarily, to land.
Tankered waste	Means water or other liquid, including waste matter in solution or suspension, that is conveyed by vehicle for disposal; but does not include Domestic Wastewater that is discharged directly from houses, caravans, buses, or similar vehicles.
Trade Waste Premises	means any land or premises used, or intended to be used for – (b) an industrial, commercial, or trade purposes; or (c) storing, transferring, treating, or discharging trade waste For the avoidance of doubt, a Trade Waste Premises includes but is not limited to a Home-based Business or Mobile Trade Premises carried out from a residential Premises or a mobile or temporary facility.
Trade Waste	means any waste that is produced in the course of an industrial, commercial, trade process or operation, or a related process or operation, and discharged into a wastewater network, and includes tankered waste discharged or proposed to be discharged into a wastewater network; but does not include any class of waste or material that has been specified not to be trade waste by

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	this Trade Waste Discharge Plan under section 185 of the Local Government (Water Services) Act 2025.
Trade waste bylaw	Means a water services bylaw made under section 258 of the Local Government (Water Services) Act 2025 that relates to trade waste discharges.
Trade Waste discharge plan	Means a plan made by a Territorial Authority under section 185 Local Government (Water Services) Act 2025
Trade waste carrier	Means any person who collects, transports, delivers, transfers or discharges trade waste into a wastewater network, whether on their own behalf or on behalf of another person.
Trade waste permit	Means a permit issued by a water service provider in accordance with section 190 Local Government (Water Services) Act 2025.
Vehicle	Has the same meaning assigned to that term in section 2 of the Land Transport Act 1998
WasteTrack	means the internet-based waste tracking system used to record and track liquid and hazardous waste from its point of generation, through transportation, to treatment or final disposal, including details of the waste generator, transporter, waste type and receiving facility.
Wastewater	Means liquid waste or used water from domestic, commercial, industrial, institutional, or other activities that is conveyed to a wastewater network for treatment, disposal or discharge.
Wastewater treatment plant	Means any facility owned, operated, managed or controlled by Council for receiving, treating, storing, processing, discharging, or otherwise managing wastewater or trade waste.
Water Services Authority	Means the Water Services Authority established under the Water Services Act 2021, commonly known as Taumata Arowai, or any successor agency responsible for exercising the relevant statutory functions.
Working Day	has the same meaning assigned to that term in the Local Government Act 2002.

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Appendix B: Section 185 content checklist

Requirement	Where addressed
Council's approach to regulating trade waste and the discharge of trade waste into wastewater networks	Sections 1, 2, 4, 9 and 10
Types of, or specific, trade waste premises to which the Plan applies	Section 4
Requirements or limits relating to transporting trade waste	Section 15
Proposed or recommended trade waste bylaws necessary to implement the Plan	Section 8
Circumstances in which fees, charges or penalties may be imposed	Section 17
Wastewater network or networks to which the Plan applies	Sections 4

Appendix C: Trade waste categories

Category	Description	Management approach
Permitted trade waste	Trade waste that complies with permitted limits and requirements specified in the bylaw.	May be managed through standard requirements, education, occasional review and targeted monitoring.
Conditional trade waste	Trade waste with characteristics, volumes or risks requiring more detailed assessment and site-specific controls.	Requires a permit with tailored conditions, monitoring, reporting and potential pre-treatment.
Tankered or transported trade waste	Trade waste collected and transported for discharge at an approved discharge point.	Requires carrier controls, approved discharge locations, records, manifests and monitoring.

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Prohibited trade waste	Trade waste that must not be discharged because it presents unacceptable risk or is prohibited by the bylaw.	Permit will not be issued. Enforcement action may be taken if discharged.

Appendix D: Risk assessment factors

- type of activity and industry sector;
- volume, flow rate, timing, frequency and variability of discharge;
- contaminant concentrations, mass loads, pH, temperature, toxicity and treatability;
- presence of fat, oil, grease, sediment, grit, chemicals, metals, solvents, hazardous substances or infectious material;
- effectiveness and reliability of pre-treatment systems;
- history of compliance, incidents, complaints or enforcement;
- proximity to sensitive network assets or constrained treatment plants;
- potential effects on worker safety, public health, treatment performance, biosolids, receiving environments and consent compliance;
- whether trade waste is transported or tankered;
- quality of records, staff training, supervision, procedures and emergency response arrangements.

Appendix E: Operational documents to support implementation

- trade waste permit application form;
- trade waste carrier permit application form;
- risk categorisation tool;
- standard permit conditions;
- inspection checklist;
- sampling and monitoring procedure;
- pre-treatment maintenance guidance;
- accidental discharge notification procedure;
- compliance and enforcement response guide;
- trade waste inventory and register;
- customer guidance for common sectors such as food premises, vehicle washes, dental practices and industrial premises;
- fees and charges schedule.

Appendix F: Trade waste permit application checklist

Applicants should provide the following information where relevant: applicant, owner, occupier and operator details; business activity description; hours of operation; trade processes; chemicals and hazardous substances used or stored; estimated and

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measured discharge volumes; flow rates; discharge timing; wastewater quality; contaminants; site drainage plans; pre-treatment details; maintenance and cleanout contracts; monitoring proposals; waste management plans; spill and incident response procedures; staff training arrangements; WasteTrack information where relevant; and any other information Council reasonably requires.

Appendix G: Matters requiring confirmation before final adoption

- current trade waste inventory and permit status;
- final wording of the Trade Waste Bylaw 2027;
- final fees and charges and charging methodology;
- delegations and authorisations for Manawatū Water Services and authorised officers;
- transition periods for existing permits, approvals and applications;
- customer communication materials;
- legal review of enforceability, proportionality and rights considerations;
- alignment with the Long-Term Plan, Water Services Strategy, infrastructure planning and resource consent requirements.

Appendix H: Indicative Conditional Trade Waste Activities and Typical Pre-Treatment/Management Controls

Industry/Activity	Source of discharge	Typical Pre-Treatment/Management Controls
Apparel	• Dry cleaners • Laundromats	• pH control • Temperature control • Flow balancing • Screening
Automotive/Engineering/ Machinery washing	• Mechanical workshops • Service stations • Car wash • Painting and panel beaters	• Corrugated plate interceptor, gravity separator, hydrocyclone or other systems • No open areas allowing rainwater discharge to sewer
Automotive/Engineering/ Machinery washing	• Truck washes • Equipment and container washing facilities	• Grease separation • Screening • No open areas allowing rainwater discharge to sewer

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Industry/Activity	Source of discharge	Typical Pre-Treatment/Management Controls
Building, ceramic or paper products manufacturing	• Manufacturing of paper or paper products • Manufacturing of clay, glass, plaster, masonry, asbestos, or other mineral products • Concrete batching plants	• pH control • Temperature control • Flow balancing • Grease separation • Oxidation
Chemical manufacturing	• Manufacturing of fertiliser or soil amendment products • Manufacturing of chemicals, or of chemical, petroleum, coal, rubber or plastic products.	• Acid hydrolysis • pH control • Grease separation • Screening • Sedimentation • Flocculation • Oxidation • Anti-foam dosing • Off-site sediment removal
Clothing manufacturing	• Clothing manufacture	• pH control • Temperature control • Flow balancing • Screening
Food retail/ preparation	• Cafe's, coffee lounges, bakeries, takeaway premises, or restaurants • Butchers, fishmongers, or delis • Supermarkets, fruit and vegetable stores • Schools, polytechnics, universities (with catering facilities) • Hotels or motels (with restaurants/cafe's) • Churches, marae or halls (with catering facilities) • Preparation of food and/or catering at a residential address with a commercial kitchen or for commercial purposes.	• Grease trap • Temperature control • Flow balancing • Screening
Food production and processing	• Food manufacturing or warehousing • Recycling of food or food products	• Grease separation • pH control • Temperature control • Flow balancing • Screening

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Industry/Activity	Source of discharge	Typical Pre-Treatment/Management Controls
Food production and processing	• Beverage manufacturing	• pH control • Temperature control • Flow balancing
Food production and processing	• Meat processing • Dairy products processing • Fish or shellfish processing	• Temperature control • Grease separation • Screening • Oxidation
Laboratories and Health Care	• Hospitals • Scientific Laboratories	• Screening • Offsite disposal of screening waste and hazardous materials substances
Medical and x-ray facilities	• Dentists • Doctors' surgeries • Veterinary clinics • Chiropractors	• Amalgam separators • Silver recovery unit • Offsite removal of developer solution
Metal production and processing	• Electroplaters • Galvanisers • Foundries • Metal Surfacing • Manufacturing of fabricated metal products, machinery or equipment • Spray painting facilities	• Sedimentation • Flocculation • Clarification • pH control • Temperature control • Cyanide destruction • Screening • Off-site sediment removal
Printing	• Photo printing and publishing • Printers	• pH control • Silver recovery • Oxidation • Flow balancing
Residential care	• Residential care facilities (retirement homes, hospices)	• Grease trap • Flow balancing • Screening
Swimming pools	• Community swimming pool / spa • Hotel, gym, or club with a swimming pool	• pH control • Flow balancing

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Industry/Activity	Source of discharge	Typical Pre-Treatment/Management Controls
Textile Production	• Textile fibre or textile processing • Tanneries or leather finishings • Footwear manufacture	• pH Control • Temperature control • Flow balancing • Screening • Grease separation • Oxidation • Sedimentation • Flocculation • Clarification • Off-site sediment removal
Waste management	• Sanitary or cleaning services • Solid waste treatment (landfill leachate discharge) • Water and wastewater treatment	• pH control • Temperature control • Flow balancing • Screening • Grease separation
Other	• Funeral parlour, mortuaries	• pH control • Temperature control • Flow balancing • Screening
Other	• Barber, hairdresser	• Screening
Other	• Florist	• Screening, no herbicides to sewer
Other	• Photo processors (modular units only)	• pH control, silver recovery, oxidation
Other	• Schools, polytechnics or universities (with laboratories)	• pH control • Silver recovery • Oxidation
Other	• Premises with commercial waste masters	• Grease separation • Screening • Off-site disposal of solid wastes
Other	• Stock sale yards	• Screening • Flow balancing
Other	• Timber treatment yards	• Screening • Flow balancing • Sedimentation • Flocculation • Clarification • pH control • Off-site sediment removal

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Industry/Activity	Source of discharge	Typical Pre-Treatment/Management Controls
Other	• Manufacturing, storage, transport or use of hazardous substances	• Screening • Flow balancing • Sedimentation • Flocculation • Clarification • pH control • Off-site sediment removal

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