**Submission re:**

Napier City Council Consent Application

To Discharge Sewage Contaminants into Hawke’s Bay

**Person making submission:**

Tom Belford, BayBuzz

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**Name of Applicant:**

Napier City Council

Application to Discharge Sewage Contaminants into Hawke’s Bay

CD090514W

**Submission:**

I /we oppose the above application.

My submission is:

1. I am opposed to any treatment process that discharges biomass into Hawke’s Bay without further treatment in the form of clarifier tanks, as is the standard practice with other BTF treatment plants in operation in New Zealand.

2. I am opposed to any consent that does not impose specific limits on harmful nutrient and other discharges into the sea (such as suspended solids, oil & grease, BOD, faecal coliforms). The Napier application proposes limits only on heavy metals.

3. I do not believe that the Napier Council’s consent application has addressed adequately the ecological or health impacts of – specifically – biomass discharges into the sea. As note in the following point, ‘biomass’ has characteristics that might indeed make it more harmful than the effluent Napier is currently discharging in the Bay. The specific impacts of this biomass have not been examined.

4. I do not believe that present monitoring methods are adequate to form a credible judgment about effects that are already occurring from NCC’s discharge of sewage into the Bay, much less the behaviour (migration, dissolution) of ‘biomass’ once it is released at the outfall.

I wish to be heard in support of my submission.

I wish to attend any pre-hearing meeting that may be convened.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Tom Belford

5 July 2011