From: Jeanette MacDonald [redacted]

To: Water Infrastructure Regulation [redacted]

Subject: Watercare Price Quality emerging views submission

Greetings

I am Jeanette MacDonald. I am Tau iwi. I am an infrastructure/public health/sustainability engineer and also have secondary teaching experience. I have worked as an engineer in Northland (employed by Consulting Engineers to Council and working on operational contracts for everything except roads) and as an environmental engineer in Auckland. I am a member of the Manukau Harbour Restoration Society and a Maangere resident. I am a member of Water NZ. I am also part of two Watercare Community Liaison Groups (CLG), the Maangere Wastewater Treatment Plant CLG and the Western Isthmus stormwater/wastewater CLG.

In terms of history, Mana Whenua, Manukau Harbour Restoration Society and Maangere Bridge Resident and Ratepayers have twice taken Auckland Council (and its predecessor) and Watercare to court on consent issues and won. Maangere Bridge Residents and Ratepayers was founded in the 1960s due to the noxious odours and problematic storms of midges disturbing residential life and originating from the then oxidation ponds. As you may be aware, Watercare discharges just less than 70 % of Auckland's wastewater to the Manukau Harbour inner harbour at Maangere. The first court action was to achieve disinfection of secondary bypassed effluent at Maangere. The second time was related to the recently commissioned Central Interceptor.

I object to your process. It is only due to my membership of Water NZ and seeing their draft submission, two days ago, that I am able to make this brief, quick submission at all.

Your process, while defined by legislation, is extremely bureaucratic and technocratic. At this stage, I have more questions than answers, but the community deserves answers to these questions. I think of some of my early reading of Noam Chomsky (and later writers) and, to put it colloquially, I'm getting a few heebie jeebies. **What are your processes for avoiding regulatory capture and actually serving and communicating with the people who pay for the water infrastructure and the expensive bureaucracies that run it?**

How are you communicating with Mana Whenua on these matters? In 1999, Watercare's consent for the effluent discharge at Maangere included an agreement with Tainui for "continuous improvement" of the health of the Manukau Harbour. **How does your work relate to these sorts of agreements?** The new National Wastewater Standards were issued in December 2025. I understand the government has said consents shall not

be issued that are more stringent than the National Wastewater Standard. I believe the current Maangere Eflluent Consent has parameters now that are more stringent than the National Wastewater Standard. **Will locals and Mana Whenua have to tolerate the water quality in the Manukau declining in the future because standards have been dropped without our agreement?** I suspect that is not what we want.

In terms of the price-quality path for Watercare, how does this work relate to the consents that should define all their operations?

Your current project is focused on regulating Watercare. **I submit:**

1. There needs to be some thought about whether smaller water infrastructure organisations will have the resources to comply with these complex regulatory systems. The recent water report also shows their water infrastructure tends to be in poorer condition. In my experience, they lack the resources, in myriad ways, of Watercare. Even the amalgamated entities will lack Watercare's resources. Certainly in my time working as an infrastructure engineer, asset information was sometimes very dicey.

2. Impacts of climate change on water infrastructure. At Manukau Harbour Restoration Society, we endorse the concepts of Water-Sensitive Cities. In Taamaki/Auckland, these concepts are not yet being fully implemented. Sometimes due to cost. **Will the price-quality path enable water infrastructure to be constructed and maintained in a way that best serves the future?** Water-sensitive concepts suggest this may be localised and not the conventional water and wastewater methodologies of the last 60 years. Water sensitive concepts are sometimes difficult, but not impossible, to implement in already developed urban areas. In addition, large organisations such as Watercare frequently find it difficult to remove the blinkers of existing infrastructure and systems, explained by sunk-cost fallacy theories. Your legislation does not easily enable water supply, wastewater and stormwater to be considered together as it should be from a water cycle perspective.

3. Population increase and decrease in various parts of the country impacts the servicing of water infrastructure and the funding available. The impacts of population change are even greater in smaller and poorer rohe.

The matters covered in the documents associated with this pathway are well outside my expertise. I believe Manukau Harbour Restoration Society should be given an extension to your deadline to enable us to fully digest the work, consult with an economist, and comment further.

I endorse the Water NZ submission.

As this work writes rules which will **regulate how Watercare, and potentially all water controlling organisations, will provide finance and rate their populations into the future, it should as a minimum, be discussed and feedback sought from community members active in Watercare's Community Liaison Groups.**

Ka ora te whenua, ka ora te wai, Ka ora te tangata

Jeanette MacDonald

for Manukau Harbour Restoration Society

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