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Our Reference: W040 00

Jono East
Project Administrator
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Dear Jono East

RE: AS/NZS 1547 ON-SITE DOMESTIC WASTEWATER MANAGEMENT

In reply to the request for comments by 1 February 2008, on the AS/NZS 1547 On-site Wastewater Management draft please note as follows:

1. Page 13, C1.2.2 refers to grey water, use of which is becoming increasingly significant in countries affected by water shortage and in other countries where there is environmental awareness. As this Standard is focused on the safe treatment and return of effluent to the environment of a residential property, it is recommended that greywater not be included as it confuses the issue. Instead we suggest a separate standard be available that address the expected effluent qualities from different types of treatment processes that would assist with risk assessment concerning reusing waste water in its various forms.
2. Page 28, could Table 3.1 be more specific, especially about implementation
3. Page 33, para 4 Performance Statements - suggest that a general performance stipulation that an installation "...shall not give rise to any nuisance conditions" would be beneficial.
4. Page 50, clause C5.5.3.7 restrictions on use of disposal areas should be framed not only for the protection of their physical structure but also to protect public health by the exclusion of people, especially children, from any risk of contact with effluent residues.
5. Page 55, clause C6.2.1 mentions expected life of the disposal system vs life of the development and makes sensible provision for a reserve area. However, no

mention is made of renovation or quarantine of an area that has become sewage sick and no longer usable for disposal purposes.

6. Page 66, Appendix A. Has consideration been given to use of the Health Impact Assessment model for determining viability of on-site effluent disposal options, including the use of economic parameters?

7. Page 154, clause CT2 et al makes reference to set back distances. More detailed consideration is recommended of the demonstrably safe distance to bores used for abstraction of potable water. On-site effluent disposal is seen as a significant risk to the quality of potentially potable ground water. This is because effluent systems discharging to permeable soils work better since the liquid tends to go down (not sideways above an impermeable layer with the potential for break out and nuisance conditions/disease transmission risk). Areas with shallow bores, rapidly-draining sub soils and/or fractured rock bases all risk effluent merging with ground water before enough renovation has occurred and consequent risk to potable water draw off in the vicinity (or at some distance if groundwater flow is significant). Work to establish likely safe distances in a worst case setting would be beneficial to design of both effluent disposal systems and selection of potable water abstraction points.

Thank you for the opportunity to comment and should you require any further information the contact person is John Whitmore, johnw@adhb.govt.nz

Yours faithfully

Monica Briggs
Service Manager

cc Alan Freshwater, Ministry of Health