

Proposed Queenstown Lakes District Council Trade Waste Bylaw 2014

Filled Thursday, March 05, 2015

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A summary and Statement of Proposal for the proposed Queenstown Lakes District Council Trade Waste Bylaw 2014 can be viewed on the QLDC website here. Any person or organisation is welcome to make a submission on the proposed bylaw and the Council encourages everyone with an interest in trade waste in the Queenstown Lakes District to do so. Submissions close at 12pm on 2 April 2015. All submissions will be treated as public information.

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Contact Details:

Please enter either your name or organisation/company. Note that the Council is not able to consider anonymous submissions or those with no valid contact details.

| Variable | Response |
|--|-----------------|
| [namecomp.0] Contact Details: Full Name | (No response) |
| [namecomp.1] Contact Details: Organisation/Company | Gourmet Kitchen |

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This is a submission on the Proposed Queenstown Lakes District Council Trade Waste Bylaw 2014.

Please select whether your submission supports, opposes, or partially supports/opposes the proposed bylaw.

Partly Supports/Partly Opposes

Please enter your submission below.

Your submission should include which parts of the proposed bylaw you support or oppose by referring to the clause number and the reasons for your views.

We support the need to keep the water system clear but as a food operator that uses an approved grease trap and cleans it out regularly(SJ Allen) and does not use the chemicals to break down the grease to just get it out of my trap.. I really don't need MORE regulation that only consists of filling out paperwork with no real way of catching the ones who don't follow the rules. We now pay more for all the cleans and traps than those abusing the water system. By this bylaw it seems we will be paying again for those whom are not following the current rules.

What would you like the Council to do?

Does the bylaw need to be changed or have we got it right? Please be as precise as possible in explaining what you are seeking from the Council relating to the Proposed Queenstown Lakes District Council Trade Waste Bylaw 2014.

Put more into enforcement of rules and not more regulations

Please select the statement that applies to you.

I DO NOT wish to be heard in support of my submission.

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| Variable | Response |
|--|---------------|
| [namecomp.0] Contact Details: Full Name | Chris Buckley |
| [namecomp.1] Contact Details: Organisation/Company | (No response) |

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This is a submission on the Proposed Queenstown Lakes District Council Trade Waste Bylaw 2014.

Please select whether your submission supports, opposes, or partially supports/opposes the proposed bylaw.

Opposes

Please enter your submission below.

Your submission should include which parts of the proposed bylaw you support or oppose by referring to the clause number and the reasons for your views.

I wish to oppose the proposed bylaw for QLDC's trade waste bylaw.

The reason I oppose this is due to the ongoing costs & time that is required to maintain the proposal. While I see it as important that Queenstown rate payers are not unfairly burdened to pay for blockages in pipes there is a much better way to achieve this without forcing excessive regulation and costs as the bylaw proposes.

What would you like the Council to do?

Does the bylaw need to be changed or have we got it right? Please be as precise as possible in explaining what you are seeking from the Council relating to the Proposed Queenstown Lakes District Council Trade Waste Bylaw 2014.

A better way to achieve what you are after is to have your health inspector (for food premises) check yearly that grease traps are up to scratch and have been emptied regularly by an approved waste removal expert, if they are not up to scratch downgrade their venues rating (example from an A to a B) until they fix the problem to a satisfactory level. If they do not after a re-inspection then push ahead with a penalty.

Please select the statement that applies to you.

I DO NOT wish to be heard in support of my submission.

-----Original Message-----

From: "Richard Batt" <[REDACTED]>

Sent: Wednesday, 18 March 2015 8:30 AM

To: "services@qldc.govt.nz" <services@qldc.govt.nz>

Subject: Trade waste by law

Hi,

Just my five cents worth. Instead of setting up a new system why not use the one that all commercial businesses already have and comply with. Is there a reason this could not be added to our 12a system and an IQP inspection would be required at the business owners expense to ensure compliance. If as you say that "There are around 460 food businesses in our district. While most have grease traps or grease converters, many of them don't appear to be big enough for the volume they're dealing with, or are not being appropriately maintained". Surely this inspection could be added to the council inspections and an 12A would be required from the business owner stating that an IQP has been engaged and their system is more than adequate to the task required?

Best Regards

Richard Batt | Hotel Engineer – Rydges Lakeland Resort Queenstown

I support the idea on a whole, however there will be some issues to work through.

Testing for fog levels, where is this sample to be taken from, when is it best to extract the test sample in relation to last clean etc. what's deemed to be an acceptable level vrs time for a clean out, these, I know are all areas for discussion and no doubt each premise will require an individual attention.

Happy to sit down and offer some suggestions.

I look after the cleaning for most Wanaka business and some in Queenstown.

For my clients,

Most have moved into there business and have taken over an existing kitchen set up,

Undersized units appear to be the normal case, some of these existing grease traps are situated in awkward areas, some are built into the kitchen with benches and equipment surrounding them, access for cleaning is difficult to say the least!

Additives, (bad) most are using some form, at best all these do is keep the fat in a more liquid form and help send it down the line, some businesses are even sold a new grease converter on the understanding that there grease unit doesn't require cleaning, or with there particular additive dosed in (eating the fat) it won't need cleaning for a much longer duration,

This is a total myth, I've seen not one work in this way! Unfortunate for the client, there spending alot of money towards what there told is the required solution when it's often not. The units don't have the retention time due to flow and temperature is often an issue, having the dishwasher being plumbed through the grease trap won't help either!

The only way, in my opinion to achieve lower levels of F O G entering the network is to clean the unit out more often.

Regards

Aaron Parkhill

Septic tank services



2/04/15 (4.30pm)

Andrea Riley
Cinema Paradiso
72 Brownston St
PO Box 12
Wanaka
[REDACTED]

Submission on proposed Trade Waste By-Law 2015.

1. This is a highly complex document, far too complicated for the “lay-person” to understand and apply to ensure compliance.
2. Currently hardware systems for food / fat waste management are required in the building consent / consent to operate compliance. This can be monitored and confirmed correct use of, by Environmental Health using the annual health premise registration and food control plan inspection. Yet another license seems targeted, unfair and punitive.
3. Commercial rates are charged a water supply, sewerage and storm water levy. Surely this can be used in a direct way to increase revenue for the Queenstown specific infrastructure required upgrade. Spread over all commercial operators in the Queenstown CBD to reduce the burden on each business. Compare 30 motel kitchens waste to one small café waste. Targeting food operators is a “sticking plaster” approach.
4. This trade waste by-law must not be implemented or targeted on food businesses before the Council can confirm the grease converter / grease trap systems that are effective and DO WORK to ensure the waste water quality at outlet can be achieved. Council needs to lead this initiative, to give clear and specific information and details on compliant systems rather than place regulation and punitive charges on Food operators.

Sincerely Andrea Riley

72 Brownston St, PO Box 12, Lake Wanaka
Web: www.paradiso.net.nz E-mail: abccinema@xtra.co.nz
Cinema Ph/Fax: 03 443 1505
Office Ph: 03 443 1531 Fax: 03 443 5731

Submission QLDC Trade Waste By-Law

Background

We own a two level commercial building on the Wanaka waterfront. Three tenancies are involved in food businesses. A sandwich bar, and two other separate tenancies with commercial kitchens for preparation and serving of meals.

The building is 12 years old and grease converters were installed as part of the original build

I understand the need to introduce policies that can more adequately deal with the issues of fat, oils and grease entering the public waste water system.

I have read the QLDC documentation supplied and have a number of concerns or comments.

In no particular order:

- The Summary advises that “ council has resolved to *“begin an extended period of consultation on the proposed Trade Waste bylaw”* . The only way I found out about the proposal was by a chance reading of a notification in the Newspaper. None of my Tenants were aware of the proposal. Nor were waste operators. It will be interesting to see the level of submissions received. I think that direct contact should have been made with Commercial premises (via building Warrant of Fitness records, in an attempt to make food businesses aware of the implications of the new bylaw.
- In order to find out more information regarding the proposed Bylaw, I have contacted and left messages with Council employees (Rob Darby, Ulrich Glasner). Neither has responded to my voice mail messages.
- In particular I have concerns regarding tenant compliance, where existing grease converters are installed. These were part of the as-built sewer construction and are incorporated into the building floor slabs. It appears that the conditions of use may require new inspection points, possibly flow meters etc . This will be a major problem within the existing pipe reticulation, including where there are multiple tenancies.
- Much prescriptive information is supplied regarding sampling . Has this been checked from a practical implementation point of view. How will any sample represent a ‘typical flow’. In the course of a restaurant day there are a great many variables that will affect flow and fat content. How will any test be representative??. In the case of an in-floor grease converter, where there is no access for downstream sampling, will a sample taken from the far end chamber be acceptable ??
- Mention has been made of a number of blockages and the need to water blast the Council pipework. It would be helpful to know in what locations did this occur ?? Is it more apparent in Queenstown than Wanaka ?? Is it a district wide issue. ??? This information regarding Council interventions is not supplied. I think it should be.
- Even within the waste industry, there are many differences of opinion as to the best waste treatment practises. The pros and cons of grease traps, verses grease converters. The best method of dosing a grease converter etc etc. How will these differences be resolved ??.

Recommendation

- The introduction of the Bylaw should be by way of a trial in the areas where council is having the biggest problem re excessive waste discharge. This trial should carefully monitor the

practical implications of the bylaw and ensure that any implementation issues are resolved prior to a district wide introduction.

- Sorting out sampling methodology in different premises.(multi tenancy)
- Need or otherwise to measure flow
- Sampling techniques that can be relied upon.
- Provide time for IQP facilities to be set up and accredited
- More accurate figures re cost of implementation and operation.

Summary

- Yes a better system is needed to deal with trade waste.
- The proposed district wide bylaw, is a heavy handed approach. In the long term, this may be the only option.
- From my observation , there has been minimal if any, Council initiatives or education regarding trade waste from food premises. Further work in this area should not be ruled out as an interim option.
- A phased or pilot implementation would ensure a superior long term outcome. This would ensure , all aspects of the bylaw were tested and resolved before all users are required to implement the program. Based on the information supplied, there are too many unanswered questions.
- Within the waste industry , not enough is known or agreed regarding best practise for handling trade waste. There will need to be a period of time for this expertise to come on board. (both at Council and within the existing service sector).
- The issue of cost is significant. In all the Council documentation there is mention only of hourly charge out rates. There is no attempt to quantify what the annual cost would be for a range of 'typical users'. This is an omission.
- Council is proposing to introduce a bylaw without an accurate assessment of the impact on business operating costs . This is not good enough and needs to be urgently addressed so that affected users can properly assess the financial impact. Were this known and publicised at the outset, Council may well have got a much stronger response via the submission process.

Roger Gardiner

[REDACTED]

[REDACTED]

[REDACTED]



S.J Allen Submission – Trade Waste Bylaw

S.J Allen has been servicing 98% of the Grease Trap market in Queenstown for 15 years and would like to write in support of the proposed QLDC Trade Waste Bylaw.

I have personally seen first hand the wide and varied standard of Grease Traps in QLDC region from both a functional standard and a maintenance standard. As a major infrastructure contractor for the QLDC we also see the down stream effect of grease & fat on council infrastructure. These effects include fatted pipe work, blockages and fat build ups in wet well pump stations. These effects consume a large amount of resources to remedy on an ongoing basis.

The proposed bylaw has two key planks in my view –

- 1) Premises Classification & Monitoring.
- 2) Non Compliance Implications

These two key points will offer a point of contact between council and businesses not seen before and the ability for the QLDC to impose penalties on errant business owners. Key to this relationship is education of business owners before any penalties are imposed so I would suggest a staged introduction of the bylaw so as to get business owners on side and make the introduction of the bylaw both cost effective and efficient to all concerned. In my experience most business owners are responsible in what they discharge to our sewer network through their kitchen drainage and only a small number need further education to be made aware of the issues of not complying with best practice standards of the hospitality industry.

Finally I think the QLDC needs to consider the implications of their planning laws which continue to allow undersized, under bench grease converters to be installed in a one size fits all fashion. We must remember there are over 100 eating establishments in 2 square kilometres in central Queenstown. The grease convertor type of grease traps are sold on the myth that they need very little maintenance or emptying which is not the case. The

chemicals used in smaller volume grease converters are changing the make up of the fat solids and dispersing it into the sewer network with dire consequences.

I would further suggest that the seating capacity of an establishment should in some way reflect the both the volume of the great trap and the frequency with which it is emptied.

I am happy to speak to this submission.

Regards

Simon Spark
Managing Director
S.J Allen Wakatipu (2000) Ltd