TECHNICAL PRACTICE NOTE

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| From: | Glenn Ellery | Date: 7 October 2019 |
| Data Services Manager |
| Subject: | Consent Data Submission Standard |



# Background

Historically consent data submission has largely been focussed on consent management purposes, through ensuring the consent holder’s compliance with limits written into their consents. However current and emerging policies at regional and national levels are refocussing the need for data that is both trusted and timely to support the entire consent lifecycle (see Appendix 1).

This Technical Practice Note (TPN) details the Bay of Plenty Regional Council’s data submission standard. The document has been written to provide clarity to Council’s regulatory staff when issuing and monitoring consents, as well as industry providers and members of the public, who are installing systems.

The TPN was initially developed to address data quality issues relating to water take consents. However the standard can equally apply to all real time data required to be submitted to Council e.g. water quality data, etc.

In relation to water take monitoring, the TPN aligns itself to proposed amendments to the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 (refer to Appendix 2 for detail). Although the Regulations focus on the consented water takes of 5L/s or more, **this standard will apply to all water take consents where there is a requirement to meter and submit data electronically** i.e. not just those that are taking 5L/s or more.

# Objective of the Consent Data Submission Standard

Accurate, complete and current water information is a critical building block in establishing a water management system. Essentially, we cannot manage what we don’t understand.

The objective of the Consent Data Submission Standard is to provide confidence and timeliness in submitted consent related data so that both current and future consent lifecycle demands, relevant national standards, regulations and policy requirements are met.

Although the primary focus is on water use data, the standard has been developed with the recognition there may be other types of data, such as water quality or discharge data that can utilise the same submission standard.

# Adoption of the Consent Data Submission Standard

The Consent Data Submission Standard was adopted by the Bay of Plenty Regional Council’s Leadership Team on 10 June 2019. Water take consents issued after this date have been aligned to the requirements of this Technical Practice Note.

# Bay of Plenty Regional Council Consent Data Submission Standard

The following Consent Data Submission Standard has been developed with reference to current requirements, foreseen future needs and approaches taken by other Councils.

The technological method of data submission is purposely not described in detail to allow for both a degree of consent holder choice and to allow flexibility for adoption of future improvements in technology and best practice. The cases where it is difficult to achieve the proposed submission standard due to technological constraints are to be treated as an exception to the rule and will be addressed on a case by case basis.

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| Submission requirement |
| * Data shall be submitted to Council on a daily or more frequent basis.
* Data relating to water take consents shall be submitted with a maximum interval between readings of 15 minutes.
* All other consents shall submit data at the frequency detailed within the relevant consent conditions.
* Data shall be supplied in an approved automated file transfer format meeting Council requirements.
* Data shall be submitted to a Council defined destination.
* Data shall be recorded and transferred using a ‘machine to machine’ electronic format meeting Council requirements.
* Where a National Environmental Monitoring Standard (NEMS) exists that relates to the submission, it shall conform to the NEMS requirements and target a quality of QC600 (Good Quality)[[1]](#footnote-1).
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# Appendix 1: Consent lifecycle demands

Data requirements within each part of the consent life cycle are described below:

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| Component | Why is data required  | What is required |
| Policy review | Data is used to understand: * resource availability
* resource utilisation
* impacts and issues
 | * Representative dataset
* High confidence in data
* Metadata
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| Policy development | Data is used to:* perform scenario modelling
* inform rules development
 | * Representative dataset
* High confidence in data
* Metadata
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| Consent Processing | Data is used to:* Inform resource modelling and availability tools.
* Identified unused resources and opportunities for transfer
 | * Individual consent data to naturalise flows
* Timely data
* Metadata
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| Consent Management | Data is used to:* Ensure compliance with conditions
* Manage and assess utilisation
* Enable active management of variable limits
* Inform users/water management groups
 | * Timely data for issue response
* Hourly data to derive rates of take
* Standard delivery to allow sharing and automation
* High confidence in data
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# Appendix 2: Proposed amendments to the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010

The Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 established a nationally-consistent regime for measuring water use.

Although there is a mandatory requirement to record the amount of water taken for water take consents at 5 litres per second or more, there is still a lack of accurate data of the actual amount taken in many cases. These data quality issues have been identified by the Auditor-General and through the Environmental Reporting Programme.

As of November 2016, water consent holders, for every consumptive consented water take of 5 litres per second or more, are required to:

* install a water-measuring device (usually a water meter)
* have this device verified for accuracy
* send a continuous record of water use to their regional council.

Although consent holders mostly have installed and verified measuring devices, the data supplied has often been of patchy quality, limiting its usefulness.

In September 2019 the Ministry for the Environment announced a proposed amendment to the Regulations to mandate telemetry (direct electronic transmission). The proposal is to require measuring water use every 15 minutes and transmitting daily electronic records. The requirement would be rolled out over time, starting with consents of 20 litres per second or more two years after the regulations come into force, through to six years for smaller consents.

**Resource Management (Measurement and Reporting of Water Takes) Regulations link:** [Measurement and Reporting of Water takes](http://www.legislation.govt.nz/regulation/public/2010/0267/latest/DLM3174201.html?src=qs)

1. [http://www.nems.org.nz/](http://www.nems.org.nz/%20)  [↑](#footnote-ref-1)