Submission Analysis - Sewerage and the Treatment and the Disposal of Sewage

Introduction
1. This report summarises submissions, and where appropriate provides recommendations, on the "Sewerage and the Treatment and the Disposal of Sewage" discussion document of the Local Government Mandatory Performance Measures consultation.

Structure of this report
2. The report sets out submitters’ responses by the order of the questions in the discussion document and any relevant general comments made by the submitters at the beginning. Recommendations on the individual performance measures are at the end of each section. Submitters’ comments are, where relevant, ordered by themes arising from the submissions.

Common abbreviations
3. A number of abbreviations are used in this report and are set out in the table below.

<table>
<thead>
<tr>
<th>Term</th>
<th>Abbreviation</th>
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<tbody>
<tr>
<td>District Council</td>
<td>DC</td>
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<tr>
<td>City Council</td>
<td>CC</td>
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<td>Regional Council</td>
<td>RC</td>
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Overall number of submitters

Submitters
General comments

<table>
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<tr>
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<tr>
<td>Three submitters provided general comments on sewerage and the treatment and the disposal of sewage flood protection including: Far North DC, Selwyn, and Waikato DC.</td>
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4. There were no specific themes from the submitters. Their comments included:
   - general agreement with the proposed performance measures (Selwyn DC);
   - support for the first three proposed performance measures (Waikato RC); and
   - general support for SOLGM's submission and general support for the findings of the Department.

5. Specific issues for small councils included:
   - if a national satisfaction survey is implemented, it should be managed by the DIA. This would avoid bias and design issues as well as reduce costs through there only being one national contract for a survey; and
   - the complaints measure is considered not to be a good proxy measure of customer satisfaction. Such a measure is vulnerable to hazardous national events beyond the control of Council (Far North DC).
KEY ASPECTS OF SEWRAGE AND THE TREATMENT AND DISPOSAL OF SEWERAGE

Q2a - Are these the key aspects on which members of the public need information in order to participate in discussions on the level of service for the provision of a sewerage system?

1. Is the sewerage system adequate and is it being maintained sufficiently to ensure it remains adequate?

2. Is the sewerage system being managed in a way that does not unduly impact on the environment?

3. Does the local government organisation responsible for the service provide a timely response if there is a problem?

4. Are customers satisfied with the service provided - with both the operation of the service itself and the way in which complaints about the service are dealt with?

Submitters

Twenty submitters responded to this question including: Hamilton CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Napier CC, Matamata Piako DC, Marlborough DC, Porirua CC, South Waikato DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Wellington CC, Watercare, Whakatane DC, Whangarei District Council, Anonymous #7, and Anonymous #10.

6. Sixteen submitters agreed or broadly agreed that these were the key aspects that the public needed information on in order to participate in discussions on the level of service for the provision of a sewerage system. Submitters included: Dunedin CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Matamata-Piako DC, Marlborough DC, South Waikato DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Wellington CC, Watercare, Whakatane DC, Whangarei DC, and Anonymous #7.

7. Four submitters either queried specific aspects of the measures or whether the information produced would be hard for the public to understand (submitters included: Invercargill CC, Thames-Coromandel DC, Waikato DC, and Whangarei DC). Specific comments included:
   - Invercargill CC, Whangarei DC, and Thames-Coromandel DC queried the link to the performance measures, and in particular the bio-solids performance measure; and
   - Waikato DC noted the main aspects of interest to the public are captured, but queried whether the information that would be produced may be too technical.

8. Anonymous #10 queried two of the aspects. They noted that aspect “1” is an input, not an outcome and the focus should be on what the community gets as a result. They also submitted that number “3” is not relevant to most councils, as there are long periods when desludgings and sometime bio-solids are retained on site.
9. Hamilton CC made a number of comments on the aspects including:

- [1] customers generally experience maintenance of the network in terms of how reliable it is. They proposed an alternative aspect “Are the sewerage services reliable?”;
- [2a] minimising environmental effects is important;
- [2b] this aspect is just part of the overall environmental impacts and is technical. They recommend that this aspect is removed;
- [3] responsiveness is important for customers; and
- [4] while customer satisfaction is important, the public cannot always provide an informed comment. Additionally, customers are concerned with network reliability.

Q2b - Are there any others?

Submitters

Thirteen submitters commented on this question including: Dunedin CC, Hauraki DC, Hastings DC, Matamata-Piako DC, Marlborough DC, Porirua CC, South Waikato DC, Thames-Coromandel DC, Upper Hutt CC, Watercare, Whakatane DC, Anonymous #7, and Anonymous #10.

10. Six submitters (Dunedin CC, Hastings DC, Upper Hutt CC, Whakatane DC, Anonymous #7, and Anonymous #10) commented that were no other relevant aspects for the treatment and the disposal of sewerage.

11. Seven submitters commented that not all the relevant aspects for and the treatment and the disposal of sewerage were captured (submitters included: Hauraki DC, Matamata-Piako DC, Marlborough DC, Porirua CC, South Waikato DC, Thames-Coromandel DC, and Watercare). Specific comments included:

- Marlborough DC noted that inflow and infiltration is a major problem for many service providers and its costs can be significant. Impacts can include sewer overflows and subsequent health risks;
- Porirua CC noted three other possible aspects that could be used:
  - “quantify wastewater lost throughout the network”- they noted, however, that measuring this may be difficult to do; and
  - “quantify peak wet versus dry weather flows”.
- Porirua CC considered that it would also be useful to see a measure comparing forecast and actual renewals funding expenditure, as defined in asset plans and depreciation.
- Thames DC submitted that another measure of environmental impact could be wastewater overflows to water bodies; and
- Watercare noted that the availability and capacity of the sewerage system to accommodate new development would be of public interest.

**Q2C - Do you have any other comments?**

**Submitters**

Eleven submitters commented on this question, including: Dunedin CC, Hastings DC, Hauraki DC, Matamata-Piako DC, Upper Hutt CC, Porirua CC, Southland DC, South Waikato DC, Porirua CC, Watercare, and Anonymous #7.

**Use of Bio-solids in a performance measure**

12. Three submitters commented on the use of “biosolids” in the performance measures for sewerage and the treatment and the disposal of sewage (submitters included: Southland DC, Porirua CC, and Watercare). Submitters provided varied views in their comments:

- Southland DC commented that they considered that biosolids were an inappropriate measure;
- Porirua CC stated that the bio-solids re-use measure may be more appropriate in a waste minimisation context. They also noted that if a bio-solids performance measure was progressed then a definition of “undue impact on the environment” would be required. The performance measure is ambiguous as it discusses two different concepts, namely “re-use” and “sustainable disposal” interchangeably; and
- Watercare submitted that they did not understand splitting Performance Measure Two. It would be better to have biosolids as a separate measure. They also noted that the ability to reuse biosolids has been seriously hampered by the policy and legislative framework that does not enable the sustainable use of biosolids.

**Other comments**

13. Other comments from submitters included:

- Dunedin CC submitted that the wording "Is the sewerage system adequate and is it being maintained sufficiently to ensure it remains adequate?" should be consistent with that of the Resource Management Act 1991, which is, "to avoid, remedy, mitigate" adverse effects on the environment. The word "adequate" in this case is undefined; and,
- Watercare commented that Aspect 4 on customer satisfaction merges two distinct issues, which should be separated. The aspect deals with customer satisfaction but addresses customers’ satisfaction through the operation of the service and whether customers are satisfied with how the organisation responds to complaints. Merging these aspects could skew or mask performance..

**Recommendation on key aspects of sewerage and the treatment and the disposal of sewerage**

14. Submitters were generally supportive of the key aspects indentified. There was, however, some concern over the use of biosolids as a performance measure and the customer service measure. These issues are dealt with elsewhere in this report.
15. It is recommended that the key aspects remain unchanged.
PROPOSED PERFORMANCE MEASURE ONE: SYSTEM ADEQUACY AND MAINTENANCE

“Annual number of dry weather overflows from a municipal sewerage system per 1000 sewerage connections.”

Q3A - Is the measure easy to understand?

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16. Eleven submitters agreed or strongly agreed that the proposed performance was easy to understand. Submitters included Clutha DC, Dunedin CC, Hutt CC, Marlborough DC, Napier CC, New Plymouth DC, Porirua CC, Upper Hutt CC, Waitomo DC, Whakatane DC, and Whangarei DC.

17. Three submitters (Waikato DC, Anonymous #6, and Anonymous #10) were neutral as to whether the proposed performance measure was easy to understand.

18. Five submitters disagreed that the proposed performance measure was easy to understand (submitters included: Hastings DC, Invercargill CC, Southland DC, Thames-Coromandel DC, and Watercare).

19. Three submitters (Hauraki DC, Matamata-Piako DC, and South Waikato DC) commented that the term “dry weather overflows” needed to be defined.

Q3B - Would the information provided by the performance measure help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service?

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20. Sixteen submitters either agreed or strongly agreed that the information provided by the performance measure would assist the public to assess a local government organisation's levels of service and to participate in discussions on future service levels. Submitters included: Clutha DC, Dunedin CC, Hauraki DC, Invercargill CC, Hutt City, Marlborough DC, Matamata-Piako DC, Napier CC, Porirua CC, South Waikato DC,
Upper Hutt CC, Waikato DC, Waitomo DC, Whakatane DC, Whangarei DC and Anonymous #10.

21. Four submitters either disagreed or strongly disagreed that the information provided by the performance measure would assist the public to assess a local government organisation’s levels of service and to participate in discussions on future service levels. (New Plymouth DC, Southland DC, Thames-Coromandel DC, and Watercare).

22. Hastings DC submitted that they were neutral.

Q3C – Do you agree that only dry weather overflows should be recorded against this measure? If you disagree, what are your reasons for this?

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23. Thirteen submitters agreed that only dry weather overflows should be recorded against the proposed performance measure. Submitters included: Hauraki DC, Invercargill CC, Marlborough DC, Matamata-Piako DC, Napier CC, Nelson CC, Selwyn DC, South Waikato DC, Upper Hutt CC, Waikato DC, Watercare, Whakatane DC, and Whangarei DC.

- Hauraki DC, Matamata-Piako DC, and South Waikato DC noted that most overflows are caused by storm events and measuring dry weather overflows is more accurate;
- Selwyn DC, Marlborough DC and Invercargill CC noted the importance of defining a dry weather overflow and when it should be reported;
- Nelson CC noted that the performance measure needed to be limited to pump stations not pipes, as the latter is affected by private actions outside of the control of local authorities

24. Nine submitters disagreed that only dry weather overflows should be measured against this performance measure. Submitters included: Dunedin CC, Hamilton CC, New Plymouth DC, Porirua CC, Ruapehu DC, Southland DC, Thames-Coromandel DC, Watercare, Wellington CC and Anonymous #10. Submitters comments included:

- Dunedin CC and Ruapehu DC submitted that both dry and wet weather overflows need to be measured. Dunedin CC, Wellington CC, and Porirua CC noted also that dry weather overflows can be maintenance issues whereas wet weather overflows are more likely to be capacity problems;
- New Plymouth DC, Thames Coromandel DC and Anonymous #10 noted that overflows would be an issue for the public no matter what the reason;
Wellington CC stated that they were unaware of dry weather overflows being an issue and the measure will suffer from ‘floor effects’. That is, consistently measuring zero or low and not being sensitive to change in the system in either direction – improvement or degradation.

Q3D - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

**Submitters**

Twenty-one submitters commented on this question including: Clutha DC, Dunedin CC, Hamilton CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Matamata-Piako DC, Napier CC, New Plymouth DC, Porirua CC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Watercare, Whakatane DC, Whangarei DC and Anonymous #10.

25. Twenty submitters commented that there would be either no or minimal costs from implementing this measure. Submitters included: Clutha DC, Dunedin CC, Hamilton CC, Hauraki DC, Hastings DC Hutt CC, Invercargill CC, Matamata-Piako DC, Napier CC, New Plymouth DC, Porirua CC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Watercare, Whakatane DC, Whangarei DC and Anonymous #10.

26. Invercargill CC and Dunedin CC noted that this would depend however on the wording of the measure and the requirements for monitoring.

27. Waikato DC submitted that local authorities would need additional SCADA information from every pump station which may incur additional costs.

28. Watercare commented that they already report on a similar measure, expressed as the number of dry weather overflows per 100km of pipe, which they considered to be a better measure of service.

Q3E - Do you have any other comments?

**Submitters**

Twenty submitters commented on this question, including Dunedin CC, Hamilton CC, Hastings DC, Marlborough DC, Matamata Piako DC, Napier CC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, Selwyn DC, SOLGM, Southland DC, Waikato DC, Waitaki DC, Waimakariri DC, Watercare, Wellington CC, Whakatane DC, and Anonymous #7.

Agreement with the draft performance measure

29. Four submitters generally agreed with the proposal (Palmerston North CC, Selwyn DC, Waitaki DC, and Anonymous #7). Palmerston North CC noted that this was on the proviso that the measure was limited to where the council itself was at fault.
Further definitions necessary
30. Three submitters (Marlborough DC, Waikato DC and Whakatane DC) noted that there was a need for further definitions or guidance to support the measure. Waikato DC submitted that a clear definition of what a dry weather overflow is would be needed. Similarly, Whakatane DC asked for further detail to define the parameters for “dry weather” versus “wet weather” conditions.

Measurement of ‘overflows’
31. Four submitters (Dunedin CC, Hastings DC, New Plymouth DC, and Waimakariri DC) identified differing issues around the measurement of overflows:

- there are national differences in the measurement of overflows with some local authorities using only “reported overflows”, as opposed to electronic measurement;
- it will be difficult for the public, using this performance measure, to assess which schemes are performing well and which are not (Hastings DC);
- the measure does not include duration and size of overflows. Duration is a signification issue in considering potential harm (New Plymouth DC); and
- the numbers of dry weather overflows are not a measure of the sewerage scheme’s effectiveness and there are significant subnational variations to “dry” and “wet” conditions (Waimakariri DC).

Alternative performance measures
32. Four submitters suggest alternative performance measures. Proposals included:

- “the reliability and resilience of the network in terms of: number of wastewater network overflows by township per month, and number of wastewater overflows per km” (Ruapehu DC);
- “the number of overflows per kilometre of reticulation” (Matamata-Piako DC); and
- Hamilton CC proposed two alternatives, either
  - “the number of unplanned interruptions to service per year”, or
  - “the number of unplanned interruptions per 1000 customers or km of sewerage main”
- Hamilton CC commented that the above would lead into key aspect three (timeliness of response if there is a problem) i.e. how many interruptions are there, and if there is one, how quickly is it resolved; and
- “measure of planned versus unplanned events” (Southland DC).

Other comments
33. Submitters made a number of other comments, of which there were no specific themes, these included:

- SOLGM noted that adequacy and maintenance is not an accurate description of this level of service. The measure seems to relate to network reliability and resilience or possibly the management of environmental effects. SOLGM agreed
that dry weather overflows are a fundamental sewerage system failure, the general public will not distinguish between the types of overflow. If wet weather overflows were included there it would need to be clarified as to whether one event constituted an overflow or whether the measure related to the number of overflows in total;

- Hamilton CC noted that overflows are a failure of the sewerage system and suggested that for the public it may sit better alongside key aspect two, which is about environmental effects; and

- Wellington CC submitted that the measure has no future focus component and therefore does not adequately measure key aspect one.

Recommendation on proposed performance measure one: system adequacy and maintenance

34. The majority of submitters considered that the performance measure was easy to understand and would be useful to the public. There were issues raised over whether only dry weather overflows should be measured. Further definitions to support the performance measure were considered necessary and submitters queried whether flows could be uniformly measured across New Zealand.

35. It is recommended that there be no change to the performance measure, dependent on a re-examination of whether only dry weather overflows should be measured. It is also recommended that thought be given to guidance and definitions that could support this performance measure.
PROPOSED PERFORMANCE MEASURE TWO (A): MANAGEMENT OF ENVIRONMENTAL IMPACTS

“Compliance with resource consents for discharge to air, land, or water from a municipal sewerage system, measured by the number of:

   a) abatement notices; and
   b) infringement notices; and
   c) enforcement orders; and
   d) successful prosecutions.”

Q4A - Is the measure easy to understand?

Submitters

Twenty submitters commented on this question including: Clutha DC, Dunedin CC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Napier CC, New Plymouth DC, Porirua CC, Selwyn DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitomo DC, Watercare, Whakatane DC, Whangarei DC., Anonymous #6, and Anonymous #10.

36. Twelve submitters either agreed or strongly agreed that the performance measure was easy to understand. Submitters included: Clutha DC, Dunedin CC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Napier CC, Selwyn DC, Upper Hutt CC, Waitomo DC, Watercare, and Whakatane DC. Hutt CC and Upper Hutt CC qualified their agreement by noting that there are differences around the country in how non-compliance is managed, with some councils and consenting authorities working closely together to overcome issues, rather than resorting to compliance action.

37. Six submitters either disagreed or strongly disagreed that the measure was easy to understand (submitters included: New Plymouth DC, Porirua CC, Southland DC, Thames-Coromandel DC, Waikato DC and Anonymous #10).

38. Whangarei DC and Anonymous #6 were neutral as to whether the measure was easy to understand.

Q4B - Will the information provided by the performance measure help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service?

Submitters

Twenty-two submitters commented on this question including: Clutha DC, Dunedin CC, Hastings DC, Hutt CC, Invercargill CC, Napier CC, Marlborough DC, New Plymouth DC, Porirua CC, Selwyn DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitomo DC, Watercare, Whakatane DC, Whangarei DC, and Anonymous #10.
39. Eight submitters agreed that the information provided by the performance measure would assist the community in assessing a local government organisation’s service levels and to participate in discussions on future service levels (submitters included: Clutha DC, Dunedin CC, Invercargill CC, Napier CC, New Plymouth DC, Selwyn DC, Waitomo DC, and Whakatane DC).

40. Ten submitters either disagreed or strongly disagreed that the information provided by the performance measure would assist the community in assessing a local government organisation’s service levels and to participate in discussions on future service levels (submitters included: Hutt CC, Marlborough DC, Porirua CC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Watercare, Whangarei DC, Anonymous #10).

41. Hutt CC and Upper Hutt CC noted that the Resource Management Act provides for other options for achieving compliance, rather than just punitive action. They also noted national differences in how non-compliances are managed.

42. Hastings DC was neutral on this question.

Q4C - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

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43. Eighteen submitters commented that this measure would not result in additional costs or implementation issues. Submitters included: Clutha DC, Dunedin CC, Hauraki DC, Hamilton CC, Hastings DC, Hutt CC, Invercargill CC, Napier CC, New Plymouth DC, Selwyn DC, South Waikato DC, Southland DC, Upper Hutt CC, Waitomo DC, Watercare, Whakatane DC, Whangarei DC, and Anonymous #10.

44. Porirua CC submitted that there may be cost increases due to regional councils issuing more notices, leading to more consultations and legal costs for councils.

45. Marlborough DC submitted that while the measure is clear, it is more reflective of the local authority’s attitude and relationship with the regional regulatory authority. This may make regional councils more formal in their dealings with councils and add legal and bureaucratic costs. Marlborough DC also noted that due to low numbers prosecutions, notices and abatement orders would need to be aggregated and the seriousness of the event would be lost.
Q4D – Do you have any other comments?

**Submitters**

Twenty-three submitters commented on this question including: Dunedin CC, Hamilton CC, Hastings DC, Matamata-Piako DC, Napier CC, Nelson CC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, Selwyn DC, SOLGM, Southland DC, Thames-Coromandel DC, Waikato DC, Waimakariri DC, Waitaki DC, Watercare, Whakatane DC, Wellington CC, Whangarei DC, Anonymous #7, and Anonymous #10.

**Submitters in agreement**

46. Six submitters either agreed with or accepted the performance measure as it was proposed (submitters included: New Plymouth CC, Palmerston North CC, Nelson CC, Waitaki DC, Wellington CC, and Whakatane DC).

**Differing levels of enforcement**

47. Seven submitters noted that were differing levels of enforcement across the country due to local authorities different approaches and the differing requirements of specific resource consents (submitters included: Dunedin CC, Hamilton CC, Hastings DC, Porirua CC, Thames-Coromandel DC, Waitaki DC, Whangarei DC).

**Not user-friendly for the public**

48. Three submitters considered that the public would find the proposed performance measure hard to understand (submitters included: New Plymouth DC, Porirua CC, and Waikato DC).

**Alternative performance measures**

49. SOLGM, Whangarei DC and Anonymous #10 proposed alternative measures:

- “the number of days that the council does not comply with any of its consent conditions to discharge waste water” (Anonymous #10). They considered that this measure would be easier to understand; and

- “number of days that local beaches or waterways are closed for swimming due to sewerage contamination” (SOLGM and Whangarei DC).

**Not a useful indicator of environmental impact**

50. Three submitters stated that the proposed performance measure would not be a good indicator for a number of reasons including: not many notices would be received; it would not really measure environmental impact; and, such action is generally a measure of last resort. (Submitters included: SOLGM, Waimakariri DC, and Watercare).

**Potential for inconsistent measurement**

51. Five submitters commented that inconsistent measurement of performance was likely due to such things as differing consent requirements between local authorities (submitters included: Palmerston North CC, SOLGM, Thames-Coromandel DC, and Wellington CC).
Other comments

52. Other comments from submitters included:

- if the performance measure proceeds, then the overall consent compliance criteria referred to in the Resource Management Act should be used (Hamilton CC);

- there may be an increase in notices, orders and prosecutions by regional councils, whereas now most breaches are minor and dealt with administratively (Matamata-Piako DC); and

- there is a need to clarify how compliance will be reported (Selwyn DC).

Recommendation on proposed performance measure: 2A management of environmental impacts

53. Submitters considered the measure easy to understand but queried how useful it would be to the general public. The majority of submitters also considered that this performance measure would not result in significant additional costs or implementation issues.

54. Submitters did highlight issues regarding differing levels of enforcement across New Zealand and queried whether it was a useful indicator for measuring actual environmental impact. A small number of submitters also highlighted the potential for inconsistent measurement between differing local authorities.

55. It is recommended that the performance measure be retained pending a re-examination of its potential effectiveness in measuring environmental impact.
PROPOSED PERFORMANCE MEASURE TWO (B): MANAGEMENT OF ENVIRONMENTAL IMPACTS

“Percentage of biosolids that is reused on an annual basis.”

Q5A - Is the measure easy to understand?

Submitters

Twenty-three submitters commented on this question including: Clutha DC, Dunedin CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Matamata-Piako DC, Napier CC, New Plymouth DC, Porirua CC, Selwyn DC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitomo DC, Watercare, Whakatane DC, Whangarei DC, Anonymous #6, and Anonymous #10.

56. Nine submitters agreed that the performance measure was easy to understand (submitters included: Clutha DC, Dunedin CC, Hauraki DC, Invercargill CC, Matamata-Piako DC, Selwyn DC, South Waikato DC, Waitomo DC, and Watercare).

57. Three submitters were neutral as to whether the performance measure was easy to understand (submitters included: Napier CC, Waikato DC, and Anonymous #6).

58. Ten submitters disagreed or strongly disagreed that the measure was easy to understand. Submitters included: Hastings DC, Hutt CC, Marlborough DC, New Plymouth DC, Porirua CC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Whangarei DC, and Anonymous #10. Additionally, Hutt CC and Upper CC commented that:

- definitions for this performance measure are needed; and
- different treatment processes produce different quantities of bio-solids. Some local authorities may have very low re-use, but of a much smaller total quantity. The overall benefit may then be higher than another Council which does re-use but with higher volumes of bio-solids.

Q5B – Will the information provided by the performance measure help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service?

Submitters

Twenty-two submitters commented on this question including Clutha DC, Dunedin CC, Hauraki DC, Hastings DC, Invercargill CC, Marlborough DC, Matamata-Piako DC, Napier CC, New Plymouth DC, Porirua CC, Selwyn DC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitomo DC, Watercare, Whakatane DC, Whangarei DC, and Anonymous #10.

59. Six submitters agreed or strongly agreed that the information provided by the performance measure would assist the public to assess a local government organisation's levels of service and to participate in discussions on future service levels.
(submitters included: Hauraki DC, Matamata-Piako DC, New Plymouth DC, South Waikato DC, Waitomo DC, and Whakatane DC).

60. Five submitters were neutral that the information provided by the performance measure would assist the public to assess a local government organisation's levels of service and to participate in discussions on future service levels (submitters included: Clutha DC, Dunedin CC, Napier CC, Waikato DC, and Watercare).

61. Ten submitters disagreed or strongly disagreed that the information provided by the performance measure would assist the public to assess a local government organisation's levels of service and to participate in discussions on future service levels. Submitters included: Hastings DC, Invercargill CC, Marlborough DC, Porirua CC, Selwyn DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Whangarei DC, and Anonymous #10. Hutt CC and Upper Hutt CC commented that the performance measure assumes that the re-use of bio-solids is always appropriate. This introduces a 'level of service' expectation that all bio-solids should be re-used.

Q5C - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?

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<tr>
<td>Nineteen submitters commented on this question including: Clutha DC, Dunedin CC, Hamilton CC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Napier CC, New Plymouth DC, Palmerston North CC, Porirua CC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waitomo DC, Watercare, Whakatane DC, Whangarei DC, and Anonymous #10.</td>
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62. Nine submitters commented that the measure would not result in additional costs or implementation issues. Submitters included: Clutha DC, Dunedin CC, Hamilton CC, Hutt CC, Invercargill CC, Napier CC, New Plymouth DC, Upper Hutt CC, and Watercare.

63. Thames-Coromandel DC submitted that they could not comment because of a lack of detail regarding the performance measure.

64. Nine submitters noted cost or implementation issues with the propose measure. Submitters included: Hastings DC, Marlborough DC, Palmerston North CC, Porirua CC, Southland DC, Waitomo DC, Whakatane DC, and Whangarei DC, and Anonymous #10. Specific comments were:

- Five submitters noted that performance would add extra costs for local authorities especially if they did not have appropriate facilities already in place (submitters included Hastings DC, Porirua CC, Southland DC, Waitomo DC, and Whangarei DC);
- Three submitters noted desludging and subsequent treatment of biosolids often did not happen annually and where there were multiple plants this was staggered. Therefore it was not a good annual measure (submitters included: Hastings DC, Whakatane DC, and Anonymous #10); and
- Whangarei DC also commented that introduction of the performance measure could be seen as forcing compliance with a desired outcome.
Q5D – Do you have any other comments?

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Oppose the proposed performance measure

65. Nine submitters opposed the proposed draft performance measure. Submitters included: Hamilton CC, Hastings DC, Ruapehu DC, Selwyn DC, SOLGM, Waimakariri DC, Waitaki DC, Wanganui DC, and Anonymous #10. Several of those submitters recommended removing the measure from the suite of measures as a whole.

Performance measure hard to understand

66. Three submitters (Ruapehu DC, Dunedin CC, and New Plymouth DC) considered that the proposed draft performance measure would be hard for the public to understand, were it to proceed.

Definitions and guidance needed

67. Four submitters (Palmerston North CC, Upper Hutt CC, Waikato DC, and Wellington CC) commented that there was a need for guidance for the terms in the proposed performance measure. Submitters queried what “biosolids” “reuse” and sustainable meant in this context. Guidance would be necessary to ensure comparability across local authorities.

Desludging

68. Three submitters noted that desludging of sewerage ponds, particularly for smaller local authorities, may occur irregularly so that would skew the performance measure (submitters included: Dunedin CC, Palmerston North CC, Waimakariri DC).

69. SOLGM and Ruapehu DC queried whether the proposed performance measure met the tests in the Local Government Act 2002 for a performance measure.

Compliance costs

70. Two submitters commented that they believed that the proposed performance measure would be costly for territorial authorities. They noted that treatment facilities may have to be upgraded to treat sewerage in the way the performance measure envisages (submitters included: Hastings DC, Selwyn DC).

Relevance of the Measure

71. Four submitters noted that the measure was not relevant to them. This was for various reasons including that their systems do not produce biosolids regularly and that other methods were equally valid ways of disposing of waste (submitters included: Hamilton CC, Invercargill CC, Napier CC Southland DC).
Potential to bias investment decisions
72. Four submitters considered that proposed performance measure could bias local authorities' investment decisions through encouraging only one type of bio-solid disposal method. This investment may not necessarily be the most cost-effective or appropriate one for local authorities (submitters included: New Plymouth CC, Palmerston North CC, SOLGM, and Thames-Coromandel DC).

Measure design
73. Three submitters queried the design of the performance measures two and three. Specifically, were the measures to be considered together or separately (submitters included: SOLGM, Waitaki DC, Wanganui DC).

Alternative measures
74. Two submitters proposed a different or altered performance measure: Porirua CC proposed, “Annual cost of bio-solids disposal per 1000 connections”. Whakatane DC suggested that reporting be required only in years where bio-solids are disposed of, rather than annually.

Support for the proposed performance measure
75. Nelson CC and Anonymous #7 supported the proposed performance measure.

Other comments
76. Other comments from submitters included:

- emphasising the beneficial reuse of biosolids reduces the significance of other potential impacts of sewage discharges (Invercargill CC); and

- the current use of bio-solids is very limited and is not supported by the regulatory frameworks. The reuse of biosolids is dependent on the constituents of the biosolids and relevant permission being given to reuse them. (Watercare)

Recommendation on proposed performance measure 2b: management of environmental impacts
77. A majority of submitters disagreed with this performance measure and whether the information it would produce would be useful to the community. Approximately half of submitters identified some level of cost or implementation issues that would result if the measure was progressed. Issues of relevance, being able to comprehend the measure, and its potential to bias investment decisions were raised by submitters.

78. The Department notes that there was a significant level of concern over the proposed performance measure from submitters. It is recommended that this performance measure be reviewed in its entirety.
PROPOSED PERFORMANCE MEASURE THREE: RESPONSE TO SEWERAGE SYSTEM FAULTS

“Median response time to attend to sewage overflows resulting from blockages or other faults of a municipal sewerage system:

a) between the time of notification and the time when service personnel reach the site; and

b) between the time of notification and resolution of the blockage or other fault.”

Q6A - Is the measure easy to understand?

Submitters

Twenty-two submitters commented on this question including: Clutha DC, Dunedin CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Matamata Piako DC, Napier CC, New Plymouth DC, Porirua CC, Selwyn DC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitomo DC, Watercare, Whakatane DC, Anonymous #6, and Anonymous #10.

79. Fourteen submitters either agreed or strongly agreed that the measure was easy to understand. Submitters included: Clutha DC, Dunedin CC, Hauraki DC, Invercargill CC, Matamata-Piako DC, Napier CC, Porirua CC, Selwyn DC, South Waikato DC, Thames-Coromandel DC, Waikato DC, Waitomo DC, Watercare, and Whakatane DC.

80. Two submitters were neutral as to whether the measure was easy to understand (submitters included: Southland DC and Anonymous #6).

81. Four submitters either disagreed or strongly disagreed that the performance measure was easy to understand (submitters included: Hastings DC, Marlborough DC, New Plymouth DC, and Anonymous #10).

82. Hutt CC and Upper Hutt CC submitted that the use of the term “median” was inappropriate. Further, the target should reflect each community’s service level of service expectations which vary from council to council as per the Local Government Act 2002.

Q6B – Will the information provided by the performance measure help the public to assess a local government organisation's levels of service and to participate in discussions on future levels of service?

Submitters

Twenty-one submitters responded to this question including: Clutha DC, Dunedin CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Matamata-Piako DC, Napier CC, New Plymouth DC, Porirua CC, Selwyn DC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitomo DC, Watercare, Whakatane DC, and anonymous #10.

83. Sixteen submitters agreed that the information provided by the performance measure would assist the community in assessing a local government organisation's service levels
84. Three submitters were neutral as to whether the information provided by the performance measure would assist the community in assessing a local government organisation's service levels and to participate in discussions on future service levels (submitters included: Dunedin CC, Hastings DC, and Southland DC).

85. One submitter (Anonymous #10) strongly disagreed that the information provided by the performance measure would assist the community in assessing a local government organisation's service levels and to participate in discussions on future service levels.

**Q6C - Would implementing the measure result in additional costs or other implementation issues for local government organisations? If so, what are they?**

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86. Twelve submitters commented that implementing the performance measure would not result in additional costs or implementation issues. Submitters included: Clutha DC, Dunedin CC, Hutt CC, Invercargill CC, Marlborough DC, Napier CC, New Plymouth DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitomo DC, Watercare, and Whakatane DC. Other comments included:

- Marlborough DC and Watercare reported already on a similar measure;
- Thames-Coromandel DC and Napier CC noted that system changes would be needed but the impact would be minimal. Thames-Coromandel DC noted also that it was unclear as to what the potential impact would be on contractual arrangements with external contractors which involves variances; and
- Invercargill CC noted the need for clear definitions, in particular 'resolution of blockage'.

87. Six submitters noted that there would be cost or implementation issues from the proposed performance measures. Submitters included: Hamilton CC, Hastings DC, Matamata-Piako DC, Waikato DC, Waitomo DC, and anonymous #10.
Q6D – Do you have any other comments?

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Support for the proposed performance measure
88. Four submitters agreed or accepted the measure in its current form. Palmerston North CC noted that its support was conditional given that “resolution” covers what may be a temporary fix (submitters included: Palmerston North CC, Waitaki DC, Wellington CC, and Whakatane DC).

Definitions and guidance
89. Five submitters commented that the proposed performance measure needed to be supported by further definitions and appropriate guidance (submitters included: Dunedin CC, Hastings DC, Marlborough DC, New Plymouth DC, and Thames-Coromandel DC). Matters identified that needed to be defined were:

- what is “urgent” or “non-urgent” (Dunedin CC and Thames-Coromandel CC);
- whether a measure should be by scheme or overall assessment (Hastings DC);
- what “other faults” are (Dunedin CC);
- what median means and should the measure include a reference to the local authority’s service level (New Plymouth DC);
- when is a request for service, a request for service (Thames-Coromandel CC); and
- what is resolution in this context, as this may be subject to different interpretations.

Alternative measures
90. One alternative measure was proposed by Dunedin CC:

“80th percentile response time to attend to urgent/ non-urgent issues resulting from municipal water reticulation network faults and unplanned interruptions:

- between the time of notification and the time when service personnel reach the site.
- between the time of notification and resolution of the fault or interruption.”

Recommendation on proposed performance measure three: response to sewerage system faults
91. Submitters generally agreed that the performance measure was easy to understand and would be useful to the community without imposing additional costs or creating implementation issues for local authorities.
92. It is recommended that the performance measure be retained and consideration be given to appropriate guidance and definitions being created to support local authorities.
PROPOSED PERFORMANCE MEASURE FOUR: CUSTOMER SATISFACTION

Two possible measures for customer satisfaction were suggested:

“Option One: Number of complaints per 1000 properties connected to a municipal sewerage system about:

a) odour;

b) faults;

c) blockages; and

d) the way in which a local government organisation responds to issues with a municipal sewerage system.”

Or

Option Two: Customer Satisfaction Survey (on a 5 point scale) on:

“a) the reliability of a municipal sewerage system; and

b) the way in which a local government organisation responds to issues with a municipal sewerage system.”

Q7A - Which of the two options would give the better picture of a local government organisation’s level of service and enable members of the public to contribute to discussions on future levels of service?

Submitters

Thirty submitters responded to this question including: Clutha DC, Dunedin CC, Far North DC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Matamata-Piako DC, Napier CC, Nelson CC, New Plymouth DC, Palmerston North CC, Porirua CC, Selwyn DC, Ruapehu DC, SOLGM, Southland DC, Thames-Coromandel DC, Upper Hutt CC, South Waikato DC, Waikato DC, Waitaki DC, Waitomo DC, Wanganui DC, Watercare, Whakatane DC, Whangarei DC, Anonymous #7, and Anonymous #10.

93. Eleven submitters supported using Option One. Submitters included: Invercargill CC, Marlborough DC, Ruapehu DC, SOLGM, Thames-Coromandel DC, Waikato DC, Waitomo DC, Wanganui DC, Watercare, Whakatane DC, and anonymous #7. Submitters made some further comments:

- Invercargill CC commented that specific guidance would be needed on how complaints are to be defined and recorded; and

- Ruapehu DC noted that setting the number at 1000 connects to a system makes some of their schemes too small to measure.
94. Fifteen submitters supported Option Two. Submitters included: Far North DC, Hauraki DC, HDC, Hutt CC, Matamata Piako DC, Napier CC, New Plymouth DC, Palmerston North CC, Selwyn DC, Southland DC, Upper Hutt CC, South Waikato DC, Waitaki DC, Whangarei DC, and anonymous #10. Far North DC also submitted that such a survey should be undertaken by the Department of Internal Affairs to avoid bias and differing methodologies and cost issues.

95. Nelson CC and Porirua CC supported the use of both options for measuring customer satisfaction.

**Q7B - From your point of view, what are the good and bad points of each option?**

### Submitters

Twenty-six submitters responded to this question including: Clutha DC, Dunedin CC, Hamilton CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Matamata Piako DC, Napier CC, New Plymouth DC, Palmerston North CC, Porirua CC, Ruapehu DC, Selwyn DC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waikato DC, Waitaki DC, Waitomo DC, Watercare, Whakatane DC, Whangarei DC and Anonymous #10.

### Complaints based measures

96. Eight submitters considered that a complaints based measure could be negative, if it is only focussed on problems, and potentially skewed if there were significant numbers of complaints from a few individuals. Submitters included: Dunedin CC, Hauraki DC, Matamata-Piako DC, Palmerston North CC, Porirua CC, Selwyn DC, Thames Coromandel DC, and anonymous #10. Watercare commented that it may not actually represent actual customer satisfaction. They also noted that there was a difference between complaints and service requests; a complaint would need to be defined.

97. Six submitters (Hastings DC, Hutt CC, Invercargill CC, Upper Hutt CC, Waitaki DC, and Waitomo DC) commented that a complaints based measure would be preferable as it was more objective and specific. Submitters also noted that this type of measure would need appropriate definitions.

98. Thames-Coromandel DC and Whakatane DC noted that they had a general preference for Option One.

99. Waitaki DC noted that information for such a measure could be collected on either a scheme by scheme basis or combined.
Survey based measures
100. Four submitters noted that customer satisfaction surveys are difficult, costly to implement and run (submitters included: Dunedin CC, Watercare, Whangarei DC and Anonymous #10). Watercare noted that if a survey based measure was implemented, DIA would need to provide guidelines on the survey methodology to be used.

101. Six submitters considered that a survey based measure would be more objective and measureable, particularly if managed by an independent third party (submitters included: Hauraki DC, Matamata-Piako DC, Selwyn DC, South Waikato DC, Thames-Coromandel DC, Watercare).

102. Four submitters noted that there was an element of subjectivity to a customer service survey. Marlborough DC submitted that a customer satisfaction survey they run could be influenced by a single media issue which would be out of proportion to its actual impact (submitters included: Marlborough DC, Southland DC, Waikato DC, Waitomo DC, and anonymous #10).

103. Waikato DC expressed a general preference for Option Two.

104. Palmerston North CC noted there were difficulties in using either measure for customer satisfaction.

Q7C - Would implementing either measure result in additional costs or other implementation issues? If so, what are they?

Submitters
Twenty-two submitters commented on this question including: Clutha DC, Dunedin CC, Hamilton CC, Hauraki DC, Hastings DC, Hutt CC, Invercargill CC, Marlborough DC, Matamata-Piako DC, Napier CC, New Plymouth DC, Palmerston North CC, Porirua CC, South Waikato DC, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Wanganui DC, Waitomo DC, Watercare, Whakatane DC, and Anonymous #10.

105. Ten submitters commented that there would be no or minor costs from implementing this performance measure. Submitters noted that they either collected this information already or undertook regular customer service surveys. Submitters included: Hutt CC, Hauraki DC, Hastings DC, Matamata-Piako DC, Napier CC, Porirua CC, South Waikato DC, Upper Hutt CC, Wanganui DC, and Waitomo DC.

106. Eight submitters noted that there would be an increase in costs dependent on the option chosen (submitters included: Clutha DC, Hamilton CC, Invercargill CC, Marlborough DC, Palmerston North CC, Southland DC, Thames Coromandel DC and Watercare). Submitters focussed on the cost impact of surveys, in particular redesigning and commissioning surveys or establishing a survey from scratch.

107. Dunedin CC noted that if a complaints measure was to be used then they would require a more robust system for collecting complaint data.
Q7D – Do you have any other comments?

**Submitters**

Sixteen submitters commented on this question including: Dunedin CC, Hastings DC, Napier CC, New Plymouth DC, Porirua CC, Ruapehu DC, SOLGM, Southland DC, Thames-Coromandel DC, Upper Hutt CC, Waimakariri DC, Watercare, Wellington CC, Whangarei DC, Anonymous #7, and Anonymous #10.

108. Five submitters commented that if a survey based performance measure was pursued it would need to be administered nationally to ensure accuracy and validity (submitters included: Dunedin CC, Ruapehu DC, SOLGM, Southland DC, Thames-Coromandel DC, Waimakariri DC). Additionally, SOLGM noted that administering a regular survey would have cost implications for local authorities.

109. Porirua CC and Anonymous #7 noted that there were definitional issues with the complaints measure as to what was a “complaint”.

110. SOLGM supported by Anonymous #10, submitted that a complaints based measure was preferable to a survey based one.

**Other comments**

111. There were a number of other comments from submitters, of which there were no specific shared themes. Submitter comments included:

- any survey would need to be carefully worded and consistent across councils (Southland DC);
- that the proposed performance measure was unsupported (Waimakariri DC);
- that the performance measure should be split into two (Wellington CC); and
- one submitter queried including the complaints related to the way in which the local government organisation responds to issues with a water supply. While acknowledging that it is a valid measure, it should be separate from issues related to the quality of water (Watercare).

**Recommendation on proposed performance measure four: customer satisfaction**

112. Submitters were divided on the best option to use for measuring customer satisfaction. A slim majority favoured a customer satisfaction survey over a complaints based measure. Submitters were concerned that a complaints measure would skew the results negatively, while some submitters thought it may be preferable as it was more objective.

113. Submitters considered, conversely, that customer satisfaction surveys could be costly and difficult to implement. Some submitters were also split on whether a survey would be more, or less, objective than a complaints based measure.

114. There are issues with surveying customer satisfaction across territorial authorities. If surveying is undertaken on an individual basis by specific territorial authorities...
differences could arise between how surveying occurs in different areas and results may not be comparable. Additionally there would be costs from having to run the surveys which may have disproportionate impacts on smaller territorial authorities. Conversely, a national survey run centrally may be unwieldy, hard to maintain over time, and be difficult to manage.

115. It is recommended that a complaints based measure be used for customer satisfaction supported by appropriate definitions and guidance.