

IMPROVEMENT PLAN

The Council's response to the Independent Review into the Wastewater Treatment Plant Fire response and recovery

FOREWORD / INTRODUCTION

The fire at the Christchurch Wastewater Treatment Plant (CWTP) on the afternoon of 1 November 2021 was an unprecedented event that caused significant damage to the plant's two trickling filters.

The Council commissioned an independent review to help it understand the Council's community response and communication with the community during and after the fire: what went well, what could have been done better, and how it can ensure responses to future significant events are improved.

The review explicitly excluded the technical responses to the fire at the Christchurch Wastewater Treatment Plant. Despite the plant losing 60 per cent of its processing capability in a matter of hours the Council has kept the treatment process running.

The review found that the focus of the Council was on maintaining uninterrupted service, which was an enormous challenge given the scale of the damage that had been done. However, there should have been a greater focus on the community. The Council was too slow to recognise that this was a community wellbeing issue. There was not enough consideration given to the potential impact of the odours from the ponds on the communities in the eastern suburbs and what information and support they needed.

“For the first six months after the fire, there was not enough consideration given to the risks of odours and how these might affect the neighbouring communities. Months were lost because the Council systems let them down:

- 1. The approach to risk assessment and risk management was too optimistic...*
- 2. There was no coordinated monitoring and reporting on incoming complaints. A valuable source of intelligence was left untapped, and the chance of an early warning was lost.*

If these failings had been addressed, then the Council could have been warned earlier and responded faster. Partner agencies could have been prepared, monitoring plans could have been put in place, and preliminary advice and support plans developed.”

The review identified that by late April, there was a discernible improvement in the level of engagement and community support. Public communications increased and started referring to the smells as “stench” rather than “unpleasant odour”, air quality monitoring started, health advice was provided, information about paint discolouration was developed and a community support package was rolled out.

“In the end Council got it right, but it was too late. Months had been lost at the start of the process and the Council was always playing catch-up”

Two over-riding findings were identified in the review:

1. Non-existent or poor relationships with the affected communities
2. The response and recovery structure was not appropriate.

The first thing we need to address is the relationship with the affected communities. To do that, we need to acknowledge the findings identified in the report and ensure there is a positive way forward. The key to this will be to work collaboratively with the affected communities and partners to develop a way of working together that is much more inclusive and engaging than previous approaches have been.

RESPONSE TO THE INDEPENDENT REVIEW

The Independent Review has two recommendations and series of suggestions for improvements. The recommendations can be grouped into two key themes:

1. Relationships with affected communities.
2. Readiness and response.

Recommendation 1. Relationships with Affected Communities

The review identified the need to strengthen the relationships with the affected communities to regain their trust and confidence. It recommended that the Council:

Prioritises strengthening and sustaining effective and respectful relationships with the affected communities, so as to regain their trust and confidence. This should include:

- a. An agreed relationship management strategy
- b. Appropriate mechanisms for monitoring the health of the relationship.
- c. Effective and appropriate channels for communication and engagement.
- d. Clear accountability for the Chief Executive to ensure this is implemented within the Council organisation.

What has been done to address the concerns identified in the review?

The report highlighted how vital communication is at a time of crisis. The Council has worked to improve the information provided to the community and improve the communication channels, including:

- Wastewater treatment plant and odour monitoring updates are published weekly on ccc.govt.nz/wastewaterfire.
- E-newsletters are distributed to our database monthly at a minimum; if there is important, timely information to share, this is published and distributed ASAP.
- Physical copies of the e-newsletter are also distributed to immediate neighbours of the CWTP when there are important updates.
- Progress and developments that could affect nearby residents are shared to local Facebook community groups, while more significant news is published on Newsline, then shared via the Council's social media pages.
- The communications reference group is informed ahead of any significant updates or developments being published, and meets on an as-required basis.
- Memos are sent to elected members when there are any developments that they need to be informed about.
- An email address – wastewater@ccc.govt.nz was set up in early 2022 to answer any queries from residents and this is still monitored daily.
- Other outputs we have used during the project include video updates, flyer drops, a rolling blog, newspaper ads, posters, infographics, and information plinths.

This has provided us with valuable insights into the communications channels that work and importantly, those that don't work, with residents in the eastern suburbs. We also gained a clearer understanding of how frequently people want to hear from us – how much is too much, and how much is not enough.

These learnings were also taken onboard as we planned for, and then delivered the consultation on the short-term options for the Organics Processing Plant. Residents in eastern suburbs were hand-delivered consultation booklets to their properties. We also left copies in key locations and community hubs. We used our existing Wastewater Treatment Plant database of contacts to promote the consultation, and also made the most of online social media pages.

What we propose to do?

Strengthening and sustaining effective and respectful relationships will take time and will require a shift away from a 'business as usual' approach to working collaboratively with the affected communities.

An agreed relationship management strategy

The Independent Review recommended the Council develop a relationship management strategy.

The key will be to work collaboratively with the affected communities to develop a way of working together that is much more inclusive and engaging than previous approaches have been. We propose that this would be co-developed with the local community, key partners, and the Waitai Coastal-Burwood-Linwood Community Board.

Effective and appropriate channels for communication and engagement

While we have improved our communication and engagement with residents in eastern suburbs, we are not complacent. We remain focused on reaching people with the information they want, using the channels they trust and prefer, and in ways that are easy to understand and access. This means:

- Maintaining a balance of digital and hard copy channels for our communications.
- Communicating early - providing updates when something might happen (even if it doesn't) rather than communicating once it has happened.
- Making sure we have sufficient resources to support our communications and engagement – both in terms of budget and people to deliver the work.
- Valuing local knowledge – working with community representatives and organisations to understand from them how best to communicate with their communities.
- Reaching more people by making the most of opportunities to engage out in the community.
- Continuing to deliver regular and timely communications on both the Wastewater Treatment Plant and the Organics Processing Plant, using the channels that we know work.

There will be an increased focus on supporting early communication with affected communities utilising community-based staff.

Reporting and monitoring

We will formally monitor the health of our relationships through our annual Christchurch Residents' Survey, which provides us with detailed information about residents' perceptions of Council's services and activities.

Informally, the Waitai Coastal-Burwood-Linwood Community Board elected members and community team continue to provide valuable insights into resident sentiment, issues and areas of interest.

Recommendation 2 - Readiness and Response

The review identified that an Incident Management Team (IMT), based on the standard Coordinated Incident Management System (CIMS) model, should have been established early on in the process.

The review recommended that the Council:

1. **Endorses** the use of an Incident Management Team (based on the CIMS model) as the standard response structure for significant/large scale events, recognising that fine tuning to the structure may be required in some circumstances.
2. **Requires** the Chief Executive to develop a process for determining when the IMT will be deployed, including:
 - a. Assessment criteria
 - b. Delegations, and
 - c. The mechanisms for ensuring Elected members have timely visibility of the decision.
3. **Requires** the Chief Executive to ensure the IMT model includes sufficient oversight such that Elected Members can be assured that:
 - a. Resources and processes are sufficiently expedited,
 - b. Community voice is being sought and considered in decision-making, and
 - c. Risks and issues are being escalated appropriately.

What has been done to address the concerns identified in the review?

The Council currently has an IMT process in place. This includes a process for determining when a matter should be managed by a BAU project team, an IMT or a Civil Defence EOC. The structure and size of the IMT reflects the nature and scale of the incident. Recent examples of when an IMT approach has been deployed include: Red Zone occupation, Covid response, Planning for protest marches, and occupation, Response to 15th March terror attack, H&S incidents and Proactive response to wet weather events.

The review identified that Council should identify suitable candidates that can operate as the IMT workstream leads and ensures that suitable CIMS training is provided. The Council has a number of people trained CIMS, IMT and EOC processes:

- Council has approximately 150 staff trained in CIMS establishment and operation, there are regular drills.
- Council is supporting a group of 55 specifically trained and experienced staff to lead different CIMS functions based on specific need.
- Council has four nationally qualified Controllers.
- Briefings are provided to Council upon the activation of an IMT as part of the CIMS process.
- Each activation of an IMT is followed by a Hot Debrief and if necessary, a subsequent review.
- Councillors were briefed on CIMS structure as part of the Induction process.
- The Mayor has been briefed on the process and criteria for establishing an EOC or IMT.

What we propose to do?

We will ensure that all key roles in the Council are aware of the process for determining when an IMT would be deployed, and the criteria that is used.

We will continue to provide a briefing to Elected Members, following the activation of an IMT so that the Council can be assured that:

- Resources and processes are sufficiently expedited
- Community voice is being sought and considered in decision-making
- Risks and issues are being escalated appropriately.

We will also provide briefings to the relevant community boards upon the activation of an IMT, as appropriate.

Other Suggestions for Improvement

The review also identified a number of suggestions for improvement that align with the key recommendations. These include:

Organics Processing Plant

The review suggested that the Council should ensure that the affected communities in the eastern suburbs receive regular progress reports on the project to relocate the Organics Processing Plant, which they see as closely related to the CWTP.

The Council recently consulted on five options for the short-term processing of kerbside organics. The consultation ran from 30 August – 1 October 2023 and, during that time, we received 2,700 submissions. This consultation was widely promoted to residents across Christchurch and Banks Peninsula through a mix of Council's own communication channels and paid advertising. Submissions are now being analysed and a report is being prepared to go to the elected Council who will make a decision on their preferred solution for the short-term future of the Organics Processing Plant.

Recognising the importance of connecting with local residents we:

- Hand-delivered copies of the consultation material into around 400 letterboxes in Bromley.
- Ensured consultation material was available at libraries and service centres, and the Bromley Community Centre.
- Held two webinars to talk about the options for consultation and answer any questions from the public. The webinars were recorded and made available on the consultation page: [Where should we send green bin organics? | Kōrero mai | Let's talk \(ccc.govt.nz\)](#)
- Kept the Waitai Coastal-Burwood-Linwood Community Board informed of developments related to the Organics Processing Plant through memos and in-person briefings.

Residents belonging to the Community Liaison Group are signed up to our Bromley newsletter. The newsletter is a primary channel we use to directly communicate any information related to the Organics Processing Plant.

We will continue to use a range of communications channels to inform Bromley and all eastern and Christchurch residents, of the Council meeting and the subsequent decision, what this means and next steps.

LTP Engagement

The review suggested that as part of the 2024 LTP process, Council should consider specifically engaging with the communities in the Eastern Suburbs.

As part of our early engagement on the Long Term Plan (the 'What Matters Most' campaign) one of our target audiences were residents in our eastern suburbs.

- 432 participants took part in our in-person engagement activities at five events in the East.
- We received 739 online and hard copy responses to the participatory budgeting exercise from residents in the East.

For the overall engagement we set a target of 15% of respondents being from eastern suburbs (benchmark: the Life in Christchurch survey). We exceeded that target, achieving 18%.

Top priorities for residents in eastern suburbs are climate change, drinking water and roads and footpaths.

The Waitai Coastal-Burwood-Linwood Community Board, along with other Community Boards, engaged with their communities in early 2023 to inform the development of Community Board Plans which in turn inform Activity Plans.

Communications and Engagement Strategy

A communications and engagement strategy for large-scale events is being reviewed to ensure it covers the requirements outlined in the report. Once the strategy has been finalised, it will become a Public Information Management (PIM) resource for use in future IMT and Civil Defence emergencies.

The Communications and Engagement Unit will continue to provide opportunities for all staff within the Unit to be upskilled in CIMS training, Civil Defence training, PIM training and Emergency Operations Centre training.

Counselling Services for Residents Suffering from Stress

We will seek advice from Te Mana Ora Waitaha (previously Community and Public Health) on services and support available to residents still suffering from stress induced by the CWTP fire (noting that Te Mana Ora Waitaha is not part of the health system that funds and delivers these services).

Establishing a CWTP Liaison Group

This needs to be fully discussed with the affected communities and partner organisations. There may be other approaches that will enable the community to engage more broadly in Council decisions and build relationships with other agencies.

Establishing a Metropolitan Leaders Group

There are already a number of cross-agency meetings and groups that include the Council, Environment Canterbury, mana whenua, the Police, Te Mana Ora Waitaha and other key agencies and stakeholders. Rather than establishing a new group, we believe it would be more appropriate to look at how existing networks can be used to address key issues facing Christchurch.

Governance Oversight

The review recommended that the Chief Executive ensures there are mechanisms for elected members to have timely visibility of the decision.

During the CWTP Fire Response:

- Members of the Wastewater Treatment Plant fire recovery team reported fortnightly to the Council and to the Finance and Performance Committee, providing updates on the various aspects of the fire recovery, including operational, community partnerships, communications, insurance and legal.
- Representatives of the team also provided monthly reports to the Insurance Subcommittee, detailing updates on the progress with the contractors to remove the burnt media from within the trickling filters, and any other updates relating to insurance matters.
- Staff also reported to the Health and Safety, and Audit & Risk Committees on health, safety, and risk matters relating to the excavation of the trickling filter media, the installation of the temporary activated sludge plant, and the installation of the aerators on the first oxidation pond.
- Staff also provide memos to elected members to ensure they were informed of any urgent updates and developments occurring either at the Wastewater Treatment Plant or in the community.

We will continue to provide updates to elected members at Council, Community Board, Finance and Performance Committee, Insurance Subcommittee, the Health & Safety Committee and the Audit & Risk Committee when there is new information to share, or there have been relevant developments to a specific committee.

We will review and develop IMT protocols and processes to ensure that risks and issues are being escalated appropriately.

Conclusion

As a council, we recognise our obligations to ensure the wellbeing of our residents. In response to the fire, our attention was focused on keeping the CWTP operating. Our risk assessments focused on the technical aspects of achieving this.

We did not consider early enough the impact that the fire and its aftermath would have on the wellbeing of our residents.

We are sorry that this has occurred and want to ensure that we learn the lessons from this response.

We want to work with the neighbouring communities to ensure that their voices are heard and contribute to Council decision-making in a meaningful way.