

BEFORE THE TARANAKI REGIONAL COUNCIL

IN THE MATTER

of an application by Remediation (NZ) Limited for resource consents under Part 5 of the Resource Management Act 1991

AND

IN THE MATTER

applications to obtain replacement consents for Consent Numbers 5838-2.2 and 5839-2 as summarised below:

Consent 5838-2.2 – to discharge of a) waste material to land for composting; and b) treated stormwater and leachate, from composting operations; onto and into land in circumstances where contaminants may enter water in Haehanga Stream catchment and directly into an unnamed tributary of the Haehanga Stream at Grid Reference (NZTM) 1731656E-5686190N, 1733127E-5684809N, 1732277E-568510N, 1732658E-5684545N and 1732056E-5684927N

Consent 5839-2 – to discharge emissions into the air, namely odour and dust, from composting operations between (NZTM) 1731704E-5685796N, 1733127E-5684809N, 1732277E-5685101N, 1732451E-5684624N and 1732056E-5684927N

STATEMENT OF SUPPLEMENTARY EVIDENCE OF

Kathryn Hooper

DATED 24 March 2021

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Introduction

1. My name is Kathryn Louise Hooper, and I have a Masters in Applied Science (Natural Resource Management) from Massey University and a Graduate Certificate in Environmental Management from Central Queensland University. My qualifications, experience and involvement in the project are detailed in my Evidence In Chief (EIC) dated 9 March 2021, however I will also add that I am also a Certified Nutrient Management Adviser, and hold an advanced level certificate in Sustainable Nutrient Management from Massey University as this is relevant to some of the comments I make below.

Summary of EIC

2. I undertook the Assessment of Environmental Effects, and found the activities consistent the relevant policies and objectives in the Regional Policy Statement, Regional Plans, National Policy Statements and Part 2 of the RMA.
3. I emphasise that this assessment is forward looking. I have assessed the activities that are proposed under this consent application. While drawing on the lessons learnt by the applicant under past consents is appropriate, the operation for which consent is sought will be different to the operation that has previously held consents.
4. The previous consents allowed a wide range of materials to be received, the wastewater from which was authorised to be irrigated over a much smaller irrigation area. The proposed activities are for a far less complex suite of input materials, the wastewater from which will be discharged over a much larger irrigation area. The application also addresses the compost stored on pad 3.
5. The proposed conditions of consent, subject to the amendments proposed in my EIC, provide assurance that the potential effects of the activity can be managed while enabling adaptive management to achieve the required environmental standards. They provide a clear and transparent framework for site management, including the management of material on Pad 3.

Supplementary Evidence

6. I have reviewed the evidence of submitters, and while there is no specific planning evidence put forward, I make the following brief comments that relate to proposed conditions. I also comment on the additional information put forward by Mr Gibson and Mr Kay in their supplementary evidence.

Pad 3 materials

7. Mr Gibson has provided additional information about a bioremediation trial for the pad 3 material (the pad containing drill waste) at the site. The early results of this trial indicate that the technique will be effective at reducing TPH levels in the compost, and RNZ has committed to actively bioremediating the product on pad 3 over the next 3 years using this bioremediation technique.
8. The fact that this trial was undertaken, and the decision to continue bioremediation demonstrates RNZ's commitment to addressing this issue. The results of the trial indicate remediation can occur rapidly, reducing the concerns about this stockpile and, effectively enabling compliance with the TPH levels in proposed consent condition 34 more quickly than expected.

Additional irrigation area

9. Mr Kay has provided additional evidence relating to a further increase in irrigation area (22% more area is to be provided). This provides further confidence that there is capacity within the system to enable good management decisions to be made, and ensure that irrigation activities can be managed appropriately to avoid effects.

Response to Submitters Evidence

10. At paragraph 74 and 75 of her evidence Ms Beecroft considers that for nitrogen to be removed via cut and carry from the irrigation areas, it must be exported completely from the site and not be introduced into the composting system. While this is generally the intention, I note my disagreement with this conclusion, because even if the baleage was composted, the nutrients would still be exported from the site, as compost.

I therefore don't believe a condition that would prevent the cut pasture being incorporated into the compost is beneficial.

11. At paragraph 29 of her evidence Ms McArthur recommends conditions on instream nutrient limits. Items a) and b) are consistent with proposed consent condition 19, however I maintain that a period of time to comply with these (i.e. the 2026 timeframe proposed by the TRC and agreed to by the applicant) is appropriate and fair.
12. Item 29 c) is inappropriate to include as this would pre-empt any Dissolved Inorganic Nitrogen (DIN) 'bottom line' that may come through in the NPSFM. (DIN was originally proposed in the draft NPSFM, but its inclusion was deferred as the level could not be agreed). I am concerned that if a DIN level is written into the consent, this may ultimately be inconsistent with the NPSFM (i.e. either higher or lower).
13. At paragraph 31 c) Ms McArthur comments that she is not aware of any direction in the NPSFM 2020 that requires previous water quality results to be interpreted according to the NPSFM version that existed at the time of monitoring. There is no direction as this is simply a matter of natural justice. It is impossible to comply with an unknown future standard.

Consent Duration

14. The TRC has proposed a consent duration of 10 years. The costs of complying with the proposed conditions of consent will be significant and a 10 year term provides limited security of operation. A consent duration of 24 years is sought, as per section 5.1 of the consent application.

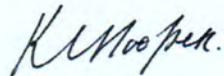
Conclusion

15. The bioremediation trial for Pad 3 materials and the additional irrigation area will provide even greater management flexibility for RNZ. These additional changes demonstrate a willingness by the applicant to continue to improve, and to find and invest in solutions that will enhance their operations.
16. Both of these changes demonstrate the importance of using an adaptive management approach to achieve the desired outcomes at this site. While it is tempting to apply rigid conditions, in my opinion it is important that the

consent enable the flexibility to trial and adopt new techniques or technology as this becomes available. It is also important that the investment in these technologies is supported by an appropriate term of consent.

17. I maintain my original conclusion that, based on the expert evidence presented, all potential and actual adverse effects can be appropriately avoided, remedied and mitigated. The positive effects associated with having such a facility in Taranaki, and the associated benefits for the wider community cannot be dismissed.

Kathryn Hooper

A handwritten signature in black ink, appearing to read 'K Hooper', written in a cursive style.

24 March 2021