# **New Plymouth District Council**

Mangapouri Cemetery
Monitoring Programme
Annual Report
2019-2020

Technical Report 2020-86





Taranaki Regional Council Private Bag 713 Stratford

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### **Executive summary**

New Plymouth District Council (NPDC) operates the Mangapouri Cemetery (the Cemetery) located on Junction Road (SH3) between New Plymouth and Egmont Village, in the Waiwhakaiho catchment. The Cemetery site is gated and includes an access road, landscaped greens, storage buildings and washroom facilities. This report covers the reporting period July 2019 to June 2020 and describes the monitoring programme implemented by the Taranaki Regional Council (the Council) to assess NPDC's environmental performance during the period under review. This report details the results of the monitoring undertaken in relation to the site, and any potential environmental impacts.

# During the monitoring period, NPDC demonstrated an overall high level of environmental performance.

NPDC held one resource consent that allows for the discharge of contaminants into land where it may enter water. The consent included a total of 8 conditions setting out the requirements that they must satisfy.

The Cemetery opened to the public in May 2019 and the compliance monitoring programme commenced following the first internment in July 2019. The monitoring programme for the period under review included an annual site inspection, water quality sampling of the receiving waters (groundwater and surface water) and continuous groundwater level monitoring. The monitoring programme also included a significant data review component, with all data submitted by NPDC assessed for compliance upon receipt.

The monitoring showed that the activities were being carried out in compliance with the conditions of the resource consent. The results of surface and groundwater quality monitoring undertaken show no adverse effects of the activity on local fresh water resources. The annual inspection undertaken found the site to be tidy and well managed and there were no Unauthorised Incidents in relation to the consent.

During the period under review, NPDC demonstrated a high level of environmental and administrative performance with the resource consent.

For reference, in the 2019-2020 year, consent holders were found to achieve a high level of environmental performance and compliance for 81% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 17% of the consents, a good level of environmental performance and compliance was achieved.

This report includes recommendations to be implemented during the 2020–2021 monitoring period.

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#### 1 Introduction

# 1.1 Compliance monitoring programme reports and the Resource Management Act 1991

#### 1.1.1 Introduction

This report is for the period July 2019 to June 2020 by the Taranaki Regional Council (the Council) describing the results of the monitoring programme associated with the resource consent held by New Plymouth District Council (NPDC).

NPDC operate the Mangapouri Cemetery (the Cemetery) located on Junction Road (SH3) between New Plymouth and Egmont Village. NPDC held one resource consent authorising the discharge to land at the Cemetery during the reporting period. The consent includes a number of special conditions which set out specific requirements that NPDC must satisfy.

This report covers the results and findings of the monitoring programme implemented by the Council in respect of the consent held by NPDC. The report also discusses the planned activities and any associated potential environmental impacts. This is the second report prepared by the Council in relation to the consent held by NPDC for the Mangapouri Cemetery and the first to cover the discharges to land and their effects. The previous report assessed and discussed the baseline monitoring undertaken in relation to the site prior to the commencement of the activity.

#### 1.1.2 Structure of this report

Section 1 of this report is a background section. It sets out general information about:

- consent compliance monitoring under the *Resource Management Act 1991* (RMA) and the Council's obligations;
- the Council's approach to monitoring sites though annual programmes;
- the resource consent held by NPDC in the Waiwhakaiho Catchment;
- the nature of the monitoring programme in place for the period under review; and
- a description of the activities and operations conducted by NPDC at the Cemetery site.

**Section 2** presents the results of monitoring during the period under review, including scientific and technical data.

**Section 3** discusses the results, their interpretations, and their significance for the environment.

Section 4 presents recommendations to be implemented in the 2020-2021 monitoring year.

A glossary of common abbreviations and scientific terms, and a bibliography, are presented at the end of the report.

#### 1.1.3 The Resource Management Act 1991 and monitoring

The RMA primarily addresses environmental 'effects' which are defined as positive or adverse, temporary or permanent, past, present or future, or cumulative. Effects may arise in relation to:

- a. the neighbourhood or the wider community around an activity, and may include cultural and socialeconomic effects;
- b. physical effects on the locality, including landscape, amenity and visual effects;
- c. ecosystems, including effects on plants, animals, or habitats, whether aquatic or terrestrial;

- d. natural and physical resources having special significance (for example recreational, cultural, or aesthetic); and
- e. risks to the neighbourhood or environment.

In drafting and reviewing conditions on discharge permits, and in implementing monitoring programmes, the Council is recognising the comprehensive meaning of 'effects' inasmuch as is appropriate for each activity. Monitoring programmes are not only based on existing permit conditions, but also on the obligations of the RMA to assess the effects of the exercise of consents. In accordance with Section 35 of the RMA, the Council undertakes compliance monitoring for consents and rules in regional plans, and maintains an overview of the performance of resource users and consent holders. Compliance monitoring, including both activity and impact monitoring, enables the Council to continually re-evaluate its approach and that of consent holders to resource management and, ultimately, through the refinement of methods and considered responsible resource utilisation, to move closer to achieving sustainable development of the region's resources.

#### 1.1.4 Evaluation of environmental and administrative performance

Besides discussing the various details of the performance and extent of compliance by NPDC, this report also assigns them a rating for their environmental and administrative performance during the period under review.

Environmental performance is concerned with <u>actual or likely effects</u> on the receiving environment from the activities during the monitoring year. Administrative performance is concerned with NPDC's approach to demonstrating consent compliance <u>in site operations and management</u> including the timely provision of information to Council (such as contingency plans and water take data) in accordance with consent conditions.

Events that were beyond the control of the consent holder <u>and</u> unforeseeable (that is a defence under the provisions of the RMA can be established) may be excluded with regard to the performance rating applied. For example loss of data due to a flood destroying deployed field equipment.

The categories used by the Council for this monitoring period, and their interpretation, are as follows:

#### **Environmental Performance**

**High:** No or inconsequential (short-term duration, less than minor in severity) breaches of consent or regional plan parameters resulting from the activity; no adverse effects of significance noted or likely in the receiving environment. The Council did not record any verified unauthorised incidents involving significant environmental impacts and was not obliged to issue any abatement notices or infringement notices in relation to such impacts.

**Good:** Likely or actual adverse effects of activities on the receiving environment were negligible or minor at most. There were some such issues noted during monitoring, from self reports, or in response to unauthorised incident reports, but these items were not critical, and follow-up inspections showed they have been dealt with. These minor issues were resolved positively, co-operatively, and quickly. The Council was not obliged to issue any abatement notices or infringement notices in relation to the minor non-compliant effects; however abatement notices may have been issued to mitigate an identified potential for an environmental effect to occur.

#### For example:

- High suspended solid values recorded in discharge samples, however the discharge was to land or to receiving waters that were in high flow at the time;
- Strong odour beyond boundary but no residential properties or other recipient nearby.

**Improvement required**: Likely or actual adverse effects of activities on the receiving environment were more than minor, but not substantial. There were some issues noted during monitoring, from self reports, or in response to unauthorised incident reports.

Cumulative adverse effects of a persistent minor non-compliant activity could elevate a minor issue to this level. Abatement notices and infringement notices may have been issued in respect of effects.

**Poor:** Likely or actual adverse effects of activities on the receiving environment were significant. There were some items noted during monitoring, from self reports, or in response to unauthorised incident reports. Cumulative adverse effects of a persistent moderate non-compliant activity could elevate an 'improvement required' issue to this level. Typically there were grounds for either a prosecution or an infringement notice in respect of effects.

#### Administrative performance

**High:** The administrative requirements of the resource consents were met, or any failure to do this had trivial consequences and were addressed promptly and co-operatively.

**Good:** Perhaps some administrative requirements of the resource consents were not met at a particular time, however this was addressed without repeated interventions from the Council staff. Alternatively adequate reason was provided for matters such as the no or late provision of information, interpretation of 'best practical option' for avoiding potential effects, etc.

**Improvement required:** Repeated interventions to meet the administrative requirements of the resource consents were made by Council staff. These matters took some time to resolve, or remained unresolved at the end of the period under review. The Council may have issued an abatement notice to attain compliance.

**Poor:** Material failings to meet the administrative requirements of the resource consents. Significant intervention by the Council was required. Typically there were grounds for an infringement notice.

For reference, in the 2019-2020 year, consent holders were found to achieve a high level of environmental performance and compliance for 81% of the consents monitored through the Taranaki tailored monitoring programmes, while for another 17% of the consents, a good level of environmental performance and compliance was achieved.

### 1.2 Process description

NPDC operate two main cemeteries, the Awanui and Te-Henui cemeteries, located in central New Plymouth. As both are running out of usable space, the Mangapouri Cemetery was developed. The Cemetery opened to the public in May 2019 and the first internment was undertaken in July 2019.

The Cemetery accepts conventional single plot, natural burials and ashes. Each grave will be centered on an area of 10 m<sup>2</sup>, which will result in 1,000 graves per hectare (ha). The first two areas available to the public are Area-A which is 0.8 ha in the north of the development, and Area-B which is 0.65 ha in the south and west of the development (Figure 1).

To avoid contamination of local surface and groundwater resources, burials are required to occur at a minimum of 0.8 m above the high water table. Internments will be spread out in time and space to reduce any risks associated with point source loading.

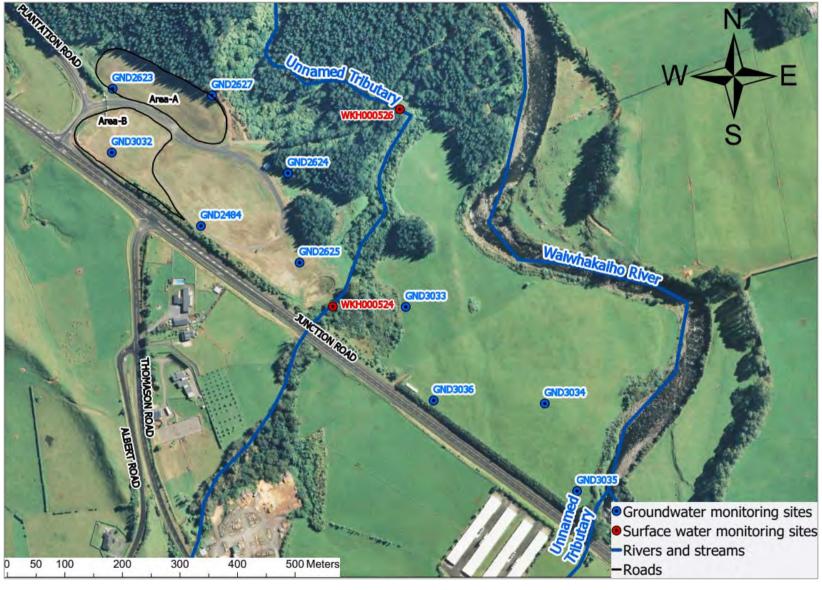


Figure 1 Mangapouri Cemetery location map

#### 1.3 Resource consents

NPDC holds one discharge consent in relation to the Cemetery. The details of which are summarised in the table below (Table 1). A summary of the conditions attached to the permit are set out in Section 3 of this report.

A summary of the various consent types issued by the Council is included in Appendix I, as is a copy of the permit held by NPDC that authorises their discharge to land.

Table 1 Summary of resource consents held by NPDC at the Mangapouri Cemetery

| Consent number              | Purpose   | Granted        | Review    | Expires        |  |  |  |  |  |  |
|-----------------------------|---|----------------|-----------|----------------|--|--|--|--|--|--|
| Discharges of waste to land |   |                |           |                |  |  |  |  |  |  |
| 7882-1.1                    | To discharge contaminants into land at a cemetery in circumstances where they may enter water | 09 Nov<br>2011 | June 2026 | 01 Jun<br>2046 |  |  |  |  |  |  |

### 1.4 Monitoring programme

#### 1.4.1 Introduction

Section 35 of the RMA sets obligations upon the Council to gather information, monitor, and conduct research on the exercise of resource consents within the Taranaki region. The Council is also required to assess the effects arising from the exercising of these consents and report upon them.

The Council may therefore make and record measurements of physical and chemical parameters, take samples for analysis, carry out surveys and inspections, conduct investigations, and seek information from consent holders.

The main environmental impacts associated with the internment of human remains is related to the degradation of human corpses. Degradation normally takes 10-12 years and it is estimated that more than half the pollutant load leaches within the first year, with loadings reducing by 50% each year thereafter (SEPA, 2015).

The main point source contamination issues related to cemeteries are the following (SEPA, 2015):

- Ammoniacal nitrogen resulting from the breakdown or organic products;
- Pathogens and organisms harmful to human health can be released into the environment if present;
- Formaldehyde, used in embalming fluids and coffin resins and glues is a biocide with toxic and carcinogenic properties;
- Mercury, present in amalgam in dental fillings, is a hazardous substance;
- Phosphates and metal concentrations in ground and surface water resources, present in cremated remains, can increase; and
- Phosphate from the decomposition of skeletal remains.

The monitoring programme included the collection and analysis of a comprehensive suite of general water quality parameters and those contaminants specifically related to the degradation of human remains.

The monitoring programme in relation to the Cemetery is outlined below. The collection of field data was undertaken by Geosearch, on behalf of NPDC.

#### 1.4.2 Programme liaison and management

There is generally a significant investment of time and resources by the Council in:

- ongoing liaison with resource consent holders over consent conditions and their interpretation and application;
- in discussion over monitoring requirements;
- preparation of any consent reviews, renewals, or new consent applications;
- advice on the Council's environmental management strategies and the content of regional plans; and
- consultation on associated matters.

#### 1.4.2.1 Review of NPDC's monitoring data

The monitoring data was provided quarterly to the Council for review to determine compliance with consent conditions. A Burial Plan and Report were submitted and reviewed by the Council prior to the first interment at the cemetery.

#### 1.4.2.2 Site inspections

One inspection is undertaken annually in relation to NPDC's discharge consent. The main points of interest during an inspection are to check for signs of water ponding or sediment runoff into local waterways and to survey the area for any potential environmental effects.

#### 1.4.2.3 Surface water quality monitoring

Surface water quality samples were collected in an unnamed tributary of the Waiwhakaiho River, at one site upstream and one site downstream of the Cemetery. The samples were obtained during low flow and high flow conditions. The samples were submitted to Hill laboratories (Hills) for analysis.

In addition to the routine sampling, baseline samples were collected prior to the commencement of the activity to allow for an in depth comparison of any variations in surface water composition should the need arise.

The location of surface water monitoring sites are displayed on Figure 1. A description of each site is provided in Table 2.

Table 2 Surface water monitoring site details

| Site      | Eastings | Northings | Description                                   | Location   |
|-----------|----------|-----------|---|--|
| WKH000524 | 1697720  | 5667352   | Unnamed tributary of the<br>Waiwhakaiho River | On the cemetery side of Junction Road, downstream of the SH3 culvert |
| WKH000526 | 1697837  | 5667687   | Unnamed tributary of the<br>Waiwhakaiho River | 320 m downstream of SH3 culvert                                      |

#### 1.4.2.4 Groundwater quality monitoring

Ten groundwater monitoring sites were installed by NPDC at the Cemetery site to enable the collection of comprehensive groundwater quality and level data. Monitoring was undertaken at six of the ten sites. The six sites monitored GND2623, GND2624, GND2625, GND2627, GND2484 and GND3032 are located on the western side of the unnamed tributary that intersects the Cemetery site (Figure 1). The western side of the

site includes Area-A and Area-B, the first two sections of the Cemetery available to the public for burials. The groundwater sampling was undertaken quarterly and samples were submitted to Hills for analysis.

In addition to the routine sampling baseline samples have been collected from all monitored sites to allow for a more in depth assessment of variations in groundwater composition should the need arise in the future.

#### 1.4.2.5 Groundwater level monitoring

Groundwater level data was collected using in-situ level loggers from six sites GND2623, GND2624, GND2625, GND2627 GND2484 and GND3032. Loggers recorded at 15 minute intervals and were downloaded quarterly and submitted to the Council for review.

The location of all groundwater monitoring sites are displayed on Figure 1 and the details of each site included in the monitoring programme are summarised below in Table 3.

Table 3 Groundwater monitoring site details

| Site code | id. | Eastings | Northings | bore depth<br>(m) | Screen depth<br>(m) |
|-----------|-----|----------|-----------|-------------------|---------------------|
| GND2623   | MW1 | 1697453  | 5667700   | 8.0               | 1.2-8               |
| GND2624   | MW2 | 1697688  | 5667583   | 6.0               | 1.2-6               |
| GND2625   | MW3 | 1697703  | 5667463   | 5.6               | 1.6-5.6             |
| GND2484*  | MW4 | 1697570  | 5667514   | 8.0               | 1.2-8               |
| GND2627   | MW5 | 1697587  | 5667689   | 12.0              | 0-12                |
| GND3032   | MW6 | 1697454  | 5667601   | 8.0               | 4-8                 |

<sup>\*</sup>Note GND2484 is referred to as GND2626 in the burial report referenced in the following sections

#### 2 Results

### 2.1 Inspections

An annual inspection was undertaken by a Council Officer on 22 May 2020. The inspection included a site walkover to survey the site for potential environmental impacts. Manual groundwater level measurements were also taken and the monitoring equipment inspected to ensure it was in good condition.

No issues were identified during the inspection.

#### 2.2 Provision of consent holder data

Groundwater levels and ground and surface water quality results were provided quarterly for review.

A burial report was submitted prior to the first internment. The report outlined how NPDC would meet compliance with condition 3 of Consent 7882-1.1, which requires NPDC to adopt the best practicable option, to avoid or minimise any adverse effects on the environment.

The Report included the Burial Plan for the first five years of internments. The Burial Plan was designed to enable the spreading of burials, in both time and location, in order to reduce point source loading of contaminants (Figure 2). The Report provided a map showing which areas were suitable for which type of burial to ensure that all burials will occur no deeper than 0.8 m above the seasonally high water table.

The Burial Plan established that for the first five years of operation only Area-A and Area-B would be utilised. The type of internment recommended for each area was also determined using available groundwater level data and a 1 in 100 year high groundwater elevation scenario. The Burial Plan and Report were appended to the previous compliance report.

## 2.3 Results of receiving environment monitoring

The monitoring programme is designed to capture any seasonal changes in groundwater and surface water composition, and variation in groundwater levels. The following sections display and discuss the results.

#### 2.3.1 Surface water quality monitoring

Surface water samples were collected and analysed for an extensive suite of parameters during summer and winter/spring flow conditions. Both sites, one upstream and one downstream, are located in the unnamed tributary of the Waiwhakaiho River that flows through the centre of the Cemetery site. The results of the baseline analysis in comparison to the more recent sampling carried out are set out below in Table 4 and Table 5.

Dissolved reactive phosphorus and total organic carbon show slightly higher concentrations downstream of the site during the summer months when flows are at their lowest both pre and post commencement of the activity.

There are also some minor differences in some parameters seen between seasons. The summer samples exhibit higher total dissolved solids, carbonates and major cation and anions in both sites, when compared to the winter/spring samples. The increases in these analytes are likely related to samples being made up of predominantly groundwater sourced baseflow during the drier summer months. In comparison during the winter and spring when increases in nitrogen species can be seen, a major component of flow will be rainfall runoff received from the predominantly rural surroundings.

No significant changes in surface water quality can be seen between the upstream and downstream sites since monitoring commenced

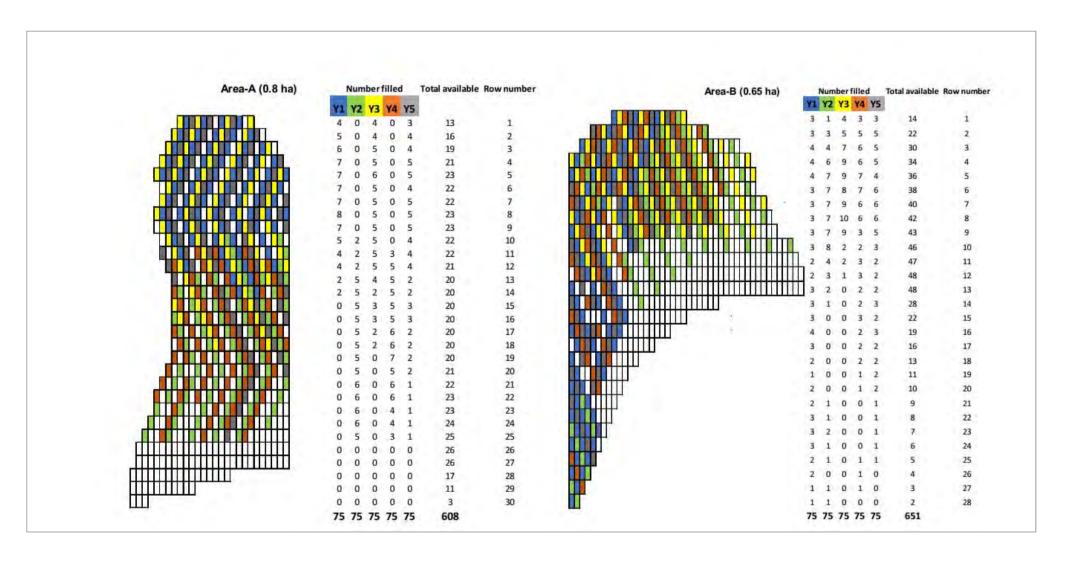


Figure 2 Burial Plan for first five years of operation

Table 4 Surface water quality results-upstream

| Parameter                     | Site id                          |           |           | WKH0      | 00524 upstream |           |         |         |
|-------------------------------|----------------------------------|-----------|-----------|-----------|----------------|-----------|---------|---------|
| Sample date                   | Unit                             | 05-Oct-17 | 31-Jan-18 | 22-Jul-19 | 17-Jan-20      | 20-Jul-20 | Minimum | Maximum |
| рН                            | рН                               | 7.2       | 7.5       | 7.2       | 7.7            | 7         | 7       | 7.7     |
| Total alkalinity              | g/m³ CaCO₃                       | 36        | 76        | 33        | 62             | 36        | 33      | 76      |
| Carbonate                     | g/m³ CO₃                         | <1.0      | <1.0      | <1.0      | <1.0           | <1.0      | <1.0    | <1.0    |
| Bicarbonate                   | g/m³ HCO₃                        | 44        | 92        | 40        | 75             | 44        | 40      | 92      |
| Total hardness                | g/m³ CaCO₃                       | 43        | 74        | 40        | 63             | 43        | 40      | 74      |
| Electrical conductivity       | mS/m                             | 14        | 21.5      | 13.4      | 18.1           | 13.8      | 13.4    | 21.5    |
| Total suspended solids        | g/m³                             | <3        | <3        | <3        | <3             | <3        | <3      | <3      |
| Total dissolved solids        | g/m³                             | 95        | 146       | 90        | 126            | 103       | 90      | 146     |
| Dissolved calcium             | g/m³                             | 10.2      | 16        | 9.7       | 13.8           | 10.2      | 9.7     | 16      |
| Dissolved magnesium           | g/m³                             | 4.3       | 8.2       | 3.8       | 6.8            | 4.1       | 3.8     | 8.2     |
| Dissolved potassium           | g/m³                             | 2.9       | 3.5       | 2.8       | 3.4            | 2.7       | 2.7     | 3.5     |
| Dissolved sodium              | g/m³                             | 8.9       | 13.5      | 8.7       | 11.6           | 8.9       | 8.7     | 13.5    |
| Chloride                      | g/m³                             | 12.7      | 14.5      | 12.4      | 14.6           | 12.6      | 12.4    | 14.6    |
| Total nitrogen                | g/m³                             | 1.58      | 0.79      | 1.7       | 1.18           | 1.7       | 0.79    | 1.7     |
| Ammoniacal nitrogen           | g/m³                             | 0.057     | 0.04      | 0.058     | 0.047          | 0.048     | 0.04    | 0.058   |
| Nitrite nitrogen              | g/m³ N                           | 0.007     | 0.004     | 0.003     | 0.004          | 0.004     | 0.003   | 0.007   |
| Nitrate nitrogen              | g/m³ N                           | 1.33      | 0.63      | 1.58      | 1.01           | 1.61      | 0.63    | 1.61    |
| Nitrate & nitrite nitrogen    | g/m³ N                           | 1.34      | 0.63      | 1.58      | 1.01           | 1.61      | 0.63    | 1.61    |
| Total kjeldahl nitrogen       | g/m³                             | 0.24      | 0.17      | 0.12      | 0.17           | <0.10     | 0.12    | 0.24    |
| Dissolved reactive phosphorus | g/m³                             | <0.004    | 0.005     | <0.004    | 0.009          | 0.004     | 0.004   | 0.009   |
| Total phosphorus              | g/m³                             | 0.016     | 0.029     | 0.023     | 0.026          | 0.018     | 0.016   | 0.029   |
| Sulphate                      | g/m³                             | 5.9       | 7.2       | 5.5       | 6.3            | 6.5       | 5.5     | 7.2     |
| Biological oxygen demand      | g O <sub>2</sub> /m <sup>3</sup> | <2        | <2        | <2        | <2             | <2        | <2      | <2      |
| Chemical oxygen demand        | g O <sub>2</sub> /m <sup>3</sup> | <6        | <6        | <6        | 6              | 6         | <6      | 6       |
| Total organic carbon          | g/m³                             | 0.7       | 1.3       | 1.5       | <0.5           | 1.5       | <0.5    | 1.5     |
| Escherichia coli              | MPN/100mL                        | > 200     | 579       | 261       | 225            | 308       | >200    | 579     |

Table 5 Surface water quality results-downstream

| Parameter                     | Site id                          |           |           | WKH00     | 0526 downstrea | m         |         |         |
|-------------------------------|----------------------------------|-----------|-----------|-----------|----------------|-----------|---------|---------|
| Sample date                   | Unit                             | 05-Oct-17 | 31-Jan-18 | 22-Jul-19 | 17-Jan-20      | 20-Jul-20 | Minimum | Maximum |
| рН                            | рН                               | 7.1       | 7.7       | 7.3       | 7.8            | 7.1       | 7.1     | 7.8     |
| Total alkalinity              | g/m³ CaCO₃                       | 36        | 73        | 32        | 59             | 36        | 32      | 73      |
| Carbonate                     | g/m³ CO₃                         | <1.0      | <1.0      | <1.0      | <1.0           | <1.0      | <1.0    | <1.0    |
| Bicarbonate                   | g/m³ HCO₃                        | 43        | 89        | 40        | 72             | 44        | 40      | 89      |
| Total hardness                | g/m³ CaCO₃                       | 43        | 73        | 40        | 62             | 43        | 40      | 73      |
| Electrical conductivity       | mS/m                             | 14        | 21.1      | 13.3      | 18             | 13.8      | 13.3    | 21.1    |
| Total suspended solids        | g/m³                             | <3        | <3        | <3        | 5              | <3        | <3      | 5       |
| Total dissolved solids        | g/m³                             | 108       | 153       | 93        | 123            | 90        | 90      | 153     |
| Dissolved calcium             | g/m³                             | 10.2      | 15.5      | 9.7       | 13.8           | 10.3      | 9.7     | 15.5    |
| Dissolved magnesium           | g/m³                             | 4.4       | 8.3       | 3.9       | 6.8            | 4.2       | 3.9     | 8.3     |
| Dissolved potassium           | g/m³                             | 2.9       | 3.7       | 2.7       | 3.6            | 2.7       | 2.7     | 3.7     |
| Dissolved sodium              | g/m³                             | 8.8       | 13.7      | 8.4       | 11.7           | 9.2       | 8.4     | 13.7    |
| Chloride                      | g/m³                             | 12.7      | 14.6      | 12.4      | 14.4           | 12.6      | 12.4    | 14.6    |
| Total nitrogen                | g/m³                             | 1.47      | 0.75      | 1.64      | 1.14           | 1.64      | 0.75    | 1.64    |
| Ammoniacal nitrogen           | g/m³                             | 0.037     | <0.010    | 0.041     | <0.010         | 0.03      | <0.01   | 0.041   |
| Nitrite nitrogen              | g/m³ N                           | 0.007     | <0.002    | 0.004     | 0.003          | 0.004     | 0.003   | 0.007   |
| Nitrate nitrogen              | g/m³ N                           | 1.27      | 0.61      | 1.54      | 0.98           | 1.58      | 0.61    | 1.58    |
| Nitrate & nitrite nitrogen    | g/m³ N                           | 1.28      | 0.61      | 1.54      | 0.99           | 1.58      | 0.61    | 1.58    |
| Total kjeldahl nitrogen       | g/m³                             | 0.19      | 0.14      | <0.10     | 0.15           | < 0.10    | <0.10   | 0.19    |
| Dissolved reactive phosphorus | g/m³                             | < 0.004   | 0.011     | <0.004    | 0.01           | 0.005     | <0.004  | 0.011   |
| Total phosphorus              | g/m³                             | 0.013     | 0.022     | 0.018     | 0.041          | 0.012     | 0.012   | 0.041   |
| Sulphate                      | g/m³                             | 6         | 6.8       | 5.5       | 6.2            | 6.5       | 5.5     | 6.8     |
| Biological oxygen demand      | g O <sub>2</sub> /m <sup>3</sup> | <2        | <2        | <2        | <2             | <2        | <2      | <2      |
| Chemical oxygen demand        | g O <sub>2</sub> /m <sup>3</sup> | <6        | <6        | <6        | 6              | 8         | <6      | 8       |
| Total organic carbon          | g/m³                             | 0.8       | <0.5      | 1.5       | 2.3            | 0.7       | <0.5    | 2.3     |
| Escherichia coli              | MPN/100mL                        | > 200     | 140       | 261       | 82             | 225       | 82      | 261     |

<sup>\*</sup>Note results reported as >200 due to the lab method for clean water which has a top range of 20

#### 2.3.2 Groundwater quality monitoring

Groundwater sampling was undertaken at quarterly intervals during the monitoring year at six sites (GND2623, GND2624, GND2625, GND2484, GND2627 and GND3032). Results are displayed in Table 6 to Table 11.

Some minor variations in groundwater quality can be observed between bores. GND2624 and GND2625, the two shallowest bores, exhibit slightly higher electrical conductivity and ion concentrations than the other bores. The higher mineral concentrations indicate that the groundwater intercepted by these two bores may be older and more evolved. Results also point to a highly reducing environment at these two sites, which has led to a decrease in nitrates and an increase in iron and manganese concentrations.

GND3032 was added to the programme in January 2019 to monitor groundwater quality in Area-B of the Cemetery. Groundwater quality in the bore fluctuates but is generally similar to that reported in Area-A.

Occasional increases in some parameters are not uncommon in shallow groundwater with some analytes being easily re-mobilised following rainfall events. The application of fertiliser at the site also has the potential to temporarily increase some parameters.

The majority of bores indicate occasional increases in COD and suspended solids. GND2627 also recorded an anomalously high nitrite and sodium result in October 2019.

The elevated total suspended solids concentrations recorded in GND2623 in April 2020 and in GND3032 in January 2019 may be an indication that these bore holes were disturbed prior to sampling resulting in the movement of sediment through the slotted screen into the bore casing.

The majority of slight variations in analyte concentrations seen in each bore during the year are a result of seasonal fluctuations and sampling variability.

Table 6 Groundwater quality results GND2627-north

| Parameter               | Bore id    |           |           |           |           | MW        | /5 (GND262 | 27)       |           |           |          |          |
|-------------------------|------------|-----------|-----------|-----------|-----------|-----------|------------|-----------|-----------|-----------|----------|----------|
| Sample date             | Unit       | 27-Feb-17 | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19  | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum  | Maximum  |
| рН                      | pН         | 6.3       | 6.2       | 6.1       | 6.1       | 6.2       | 6.1        | 6.1       | 6.1       | 6.3       | 6.1      | 6.3      |
| Total alkalinity        | g/m³ CaCO₃ | 38        | 31        | 30        | 33        | 24        | 27         | 32        | 36        | 22        | 22       | 38       |
| Carbonate               | g/m³ CO₃   | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0       | <1.0      | <1.0      | <1.0      | <1.0     | <1.0     |
| Bicarbonate             | g/m³ HCO₃  | 46        | 37        | 37        | 40        | 29        | 33         | 39        | 44        | 27        | 27       | 46       |
| Total hardness          | g/m³ CaCO₃ | 37        | 31        | 35        | 36        | 25        | 30         | 34        | 38        | 26        | 25       | 38       |
| Electrical conductivity | mS/m       | 14.9      | 13        | 14        | 13.8      | 10.8      | 12.1       | 13.6      | 14.8      | 10.7      | 10.7     | 14.9     |
| Total suspended solids  | g/m³       | 5         | 9         | <3        | 6         | 5         | <1         | <3        | <3        | <3        | <1       | 9        |
| Total dissolved solids  | g/m³       | 112       | 79        | 91        | 103       | 75        | 33         | 120       | 135       | 74        | 33       | 135      |
| Dissolved aluminium     | g/m³       | <0.003    | 0.042     | <0.003    | <0.003    | -         | -          | <0.003    | -         | -         | < 0.003  | 0.042    |
| Dissolved arsenic       | g/m³       | <0.0010   | <0.0010   | <0.0010   | <0.0010   | -         | -          | <0.0010   | -         | -         | <0.0010  | <0.0010  |
| Dissolved barium        | g/m³       | 0.0092    | 0.0086    | 0.0088    | 0.0081    | -         | -          | 0.008     | -         | -         | 0.008    | 0.0092   |
| Dissolved boron         | g/m³       | 0.009     | 0.008     | 0.008     | 0.011     | -         | -          | 0.009     | -         | -         | 0.008    | 0.011    |
| Dissolved cadmium       | g/m³       | <0.00005  | <0.00005  | <0.00005  | <0.00005  | -         | -          | <0.00005  | -         | -         | <0.00005 | <0.00005 |
| Dissolved calcium       | g/m³       | 6.6       | 5.5       | 5.7       | 6.3       | 4.9       | 30         | 5.9       | 6.7       | 4.6       | 4.6      | 30       |
| Dissolved chromium      | g/m³       | 0.0006    | <0.0005   | 0.0008    | 0.0007    | -         | -          | 0.0007    | -         | -         | <0.000   | 0.0008   |
| Dissolved copper        | g/m³       | <0.0005   | 0.0012    | 0.0005    | <0.0005   | -         | -          | 0.0007    | -         | -         | <0.0005  | 0.0012   |
| Dissolved iron          | g/m³       | <0.02     | <0.02     | 0.04      | <0.02     | -         | -          | <0.02     | -         | -         | <0.02    | 0.04     |
| Dissolved lead          | g/m³       | <0.00010  | 0.00044   | <0.00010  | <0.00010  | -         | -          | <0.00010  | -         | -         | <0.00010 | 0.00044  |
| Dissolved magnesium     | g/m³       | 5         | 4.3       | 4.9       | 4.9       | 3.2       | 12.1       | 4.7       | 5.1       | 3.6       | 3.2      | 12.1     |
| Dissolved manganese     | g/m³       | 0.0015    | 0.0019    | 0.0035    | 0.001     | -         | -          | 0.006     | -         | -         | 0.001    | 0.006    |
| Dissolved mercury       | g/m³       | <0.00008  | <0.00008  | <0.00008  | <0.00008  | -         | -          | <0.00008  | -         | -         | <0.00008 | <0.00008 |
| Dissolved Nickel        | g/m³       | <0.0005   | <0.0005   | <0.0005   | <0.0005   | -         | -          | <0.0005   | -         | -         | <0.0005  | <0.0005  |
| Dissolved potassium     | g/m³       | 0.76      | 0.67      | 0.66      | 0.84      | 0.61      | <3         | 0.72      | 0.83      | 0.49      | 0.49     | <3       |
| Dissolved sodium        | g/m³       | 14.2      | 12.9      | 12.7      | 13.4      | 10.8      | 80         | 13.4      | 15.1      | 10.8      | 10.8     | 80       |
| Dissolved zinc          | g/m³       | 0.0074    | 0.0012    | 0.003     | 0.0025    | -         | -          | 0.0016    |           | -         | 0.0012   | 0.0074   |
| Chloride                | g/m³       | 16.6      | 12.7      | 16        | 15        | 9.6       | 5.1        | 15.5      | 17.4      | 9.7       | 5.1      | 17.4     |
| Fluoride                | g/m³       | <0.05     | <0.05     | <0.05     | <0.05     | -         | -          | <0.05     |           | -         | <0.05    | <0.05    |

| Parameter                     | Bore id                          |           |           |           |           | MV        | /5 (GND26 | 27)       |           |           |         |         |
|-------------------------------|----------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|---------|---------|
| Sample date                   | Unit                             | 27-Feb-17 | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum | Maximum |
| Total nitrogen                | g/m³                             | 1.34      | 1.24      | 0.88      | 1.37      | 1.56      | 4.1       | 1.24      | 1.13      | 1.92      | 0.88    | 4.1     |
| Ammoniacal nitrogen           | g/m³                             | <0.010    | <0.010    | <0.010    | <0.010    | <0.010    | 0.59      | <0.010    | <0.010    | <0.010    | < 0.010 | 0.59    |
| Nitrite nitrogen              | g/m³ N                           | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | 11.2      | <0.002    | <0.002    | <0.002    | <0.002  | 11.2    |
| Nitrate nitrogen              | g/m³ N                           | 1.3       | 1.22      | 0.79      | 1.3       | 1.55      | 12.6      | 1.23      | 1.08      | 1.92      | 0.79    | 12.6    |
| Nitrate & nitrite nitrogen    | g/m³ N                           | 1.3       | 1.22      | 0.79      | 1.3       | 1.55      | 1.25      | 1.23      | 1.08      | 1.92      | 0.79    | 1.92    |
| Total kjeldahl nitrogen       | g/m³                             | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10   | <0.10   |
| Dissolved reactive phosphorus | g/m³                             | 0.005     | <0.004    | 0.005     | 0.005     | <0.004    | <0.004    | 0.008     | 0.005     | <0.004    | <0.004  | 0.008   |
| Dissolved reactive silica     | g/m³ SiO <sub>2</sub>            | 25        | 20        | 23        | 26        | _         | -         | 30        | -         | -         | 20      | 30      |
| Total phosphorus              | g/m³                             | 0.007     | 0.017     | <0.004    | 0.009     | 0.007     | <0.004    | 0.007     | 0.01      | <0.004    | <0.004  | 0.017   |
| Sulphate                      | g/m³                             | 4.9       | 7.2       | 6.9       | 5.9       | 6.3       | 7.4       | 5         | 4.9       | 7.3       | 4.9     | 7.4     |
| Biological oxygen demand      | g O <sub>2</sub> /m <sup>3</sup> | <2        | <2        | <2        | <2        | <2        | <2        | <2        | <2        | <2        | <2      | <2      |
| Chemical oxygen demand        | g O <sub>2</sub> /m <sup>3</sup> | <6        | <6        | <6        | <6        | <6        | <6        | <6        | <6        | <6        | <6      | <6      |
| Total organic carbon          | g/m³                             | <0.5      | 0.8       | <0.5      | <1        | 1.2       | <0.5      | <0.5      | <0.5      | <0.5      | <0.5    | 1.2     |
| Escherichia coli              | MPN/100mL                        | <1        | <1        | <1        | <1        | <1        | <1        | <1        | <1        | <1        | <1      | <1      |
| Formaldehyde                  | g/m³                             | <0.02     | <0.02     | <0.02     | <0.02     | -         | -         | <0.02     | -         | -         | <0.02   | <0.02   |

Table 7 Groundwater quality results GND2624-north

| Parameter               | Bore id               |           |           |           |           | MW        | /2 (GND262 | 24)       |           |           |         |         |
|-------------------------|-----------------------|-----------|-----------|-----------|-----------|-----------|------------|-----------|-----------|-----------|---------|---------|
| Sample date             | Unit                  | 27-Feb-17 | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19  | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum | Maximum |
| рН                      | рН                    | 6.2       | 6.0       | 6.1       | 6.1       | 6.2       | 6.1        | 6.0       | 6.2       | 6.1       | 6.0     | 6.2     |
| Total alkalinity        | g/m³ CaCO₃            | 84        | 102       | 98        | 88        | 155       | 111        | 126       | 129       | 163       | 84      | 163     |
| Carbonate               | g/m³ CO₃              | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0       | <1.0      | <1.0      | <1.0      | <1.0    | <1.0    |
| Bicarbonate             | g/m³ HCO <sub>3</sub> | 102       | 124       | 119       | 107       | 189       | 135        | 153       | 158       | 199       | 102     | 199     |
| Total hardness          | g/m³ CaCO₃            | 78        | 76        | 79        | 75        | 210       | 134        | 107       | 110       | 200       | 75      | 210     |
| Electrical conductivity | mS/m                  | 24.9      | 27.9      | 29.9      | 26.6      | 48.5      | 39         | 36.4      | 34.6      | 49.5      | 24.9    | 49.5    |
| Total suspended solids  | g/m³                  | <3        | <3        | <3        | <3        | <3        | <3         | 4         | 6         | 7         | <3      | 7       |
| Total dissolved solids  | g/m³                  | 163       | 166       | 167       | 161       | 320       | 240        | 210       | 200       | 280       | 161     | 320     |
| Dissolved aluminium     | g/m³                  | 0.004     | <0.003    | <0.003    | <0.003    | -         | -          | <0.003    | -         | -         | <0.003  | 0.004   |

| Parameter                | Bore id                          |           |           |           |           | MW        | /2 (GND262 | 24)       |           |           |         |         |
|--------------------------|----------------------------------|-----------|-----------|-----------|-----------|-----------|------------|-----------|-----------|-----------|---------|---------|
| Sample date              | Unit                             | 27-Feb-17 | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19  | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum | Maximum |
| Biological oxygen demand | g O <sub>2</sub> /m <sup>3</sup> | <2        | <2        | <2        | <2        | <2        | <2         | <2        | <2        | <2        | <2      | <2      |
| Chemical oxygen demand   | g O <sub>2</sub> /m <sup>3</sup> | <6        | <6        | 10        | <6        | <6        | <6         | <6        | <6        | 12        | <6      | 12      |
| Total organic carbon     | g/m³                             | <0.5      | 0.9       | 1.5       | <1        | <0.5      | 1.9        | <0.5      | 1.5       | 1.1       | <0.5    | 1.9     |
| Escherichia coli         | MPN/100mL                        | <1        | <1        | <1        | <1        | <1        | <1         | <1        | <1        | <1        | <1      | <1      |
| Formaldehyde             | g/m³                             | <0.02     | <0.02     | <0.02     | <0.02     | -         | -          | <0.02     | -         | -         | <0.02   | <0.02   |

Table 8 Groundwater quality results GND2625-east

| Parameter               | Bore id    | MW3 (GND2625)  27-Feb-17   26-May-17   28-Aug-17   16-Nov-17   22-Jul-19   14-Oct-19   17-Jan-20   30-Apr-20   20-Jul-20   Minimum   Maximum |           |           |           |           |           |           |           |           |          |          |  |
|-------------------------|------------|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|----------|----------|--|
| Sample date             | Unit       | 27-Feb-17  | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum  | Maximum  |  |
| рН                      | рН         | 6.2  | 6.0       | 6.3       | 6.2       | 6.2       | 6.4       | 6.2       | 6.3       | 6.2       | 6.0      | 6.4      |  |
| Total alkalinity        | g/m³ CaCO₃ | 60   | 72        | 80        | 76        | 72        | 126       | 126       | 112       | 124       | 60       | 126      |  |
| Carbonate               | g/m³ CO₃   | <1.0   | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0     | <1.0     |  |
| Bicarbonate             | g/m³ HCO₃  | 73   | 88        | 98        | 92        | 88        | 154       | 153       | 137       | 151       | 73       | 154      |  |
| Total hardness          | g/m³ CaCO₃ | 55   | 61        | 74        | 67        | 74        | 88        | 88        | 90        | 95        | 55       | 95       |  |
| Electrical conductivity | mS/m       | 18.7   | 20.4      | 21.1      | 21.7      | 19.8      | 30.6      | 33.7      | 28.6      | 30.7      | 18.7     | 33.7     |  |
| Total suspended solids  | g/m³       | 3  | 4         | 40        | <3        | <3        | 8         | 4         | <3        | 11        | <3       | 40       |  |
| Total dissolved solids  | g/m³       | 111  | 120       | 129       | 133       | 127       | 168       | 193       | 197       | 179       | 111      | 197      |  |
| Dissolved aluminium     | g/m³       | < 0.003  | <0.003    | <0.003    | <0.003    | -         | -         | <0.003    | -         | -         | <0.003   | <0.003   |  |
| Dissolved arsenic       | g/m³       | <0.0010  | <0.0010   | <0.0010   | <0.0010   | -         | -         | <0.0010   | -         | -         | <0.0010  | <0.0010  |  |
| Dissolved barium        | g/m³       | 0.069  | 0.083     | 0.072     | 0.058     | -         | -         | 0.087     | -         | -         | 0.058    | 0.087    |  |
| Dissolved boron         | g/m³       | 0.013  | 0.014     | 0.016     | 0.012     | -         | -         | 0.008     | -         | -         | 0.008    | 0.016    |  |
| Dissolved cadmium       | g/m³       | 0.00013  | <0.00005  | <0.00005  | <0.00005  | -         | -         | 0.00012   | -         | -         | <0.00005 | 0.00013  |  |
| Dissolved calcium       | g/m³       | 13.5   | 14.9      | 17.7      | 15.8      | 19.1      | 19.6      | 19        | 19.4      | 21        | 13.5     | 21       |  |
| Dissolved chromium      | g/m³       | <0.0005  | <0.0005   | <0.0005   | <0.0005   | -         | -         | <0.0005   | -         | -         | <0.0005  | <0.0005  |  |
| Dissolved copper        | g/m³       | <0.0005  | <0.0005   | <0.0005   | <0.0005   | -         | -         | 0.0008    | -         | -         | <0.0005  | 0.0008   |  |
| Dissolved iron          | g/m³       | 0.25   | 0.79      | 1.66      | 1.56      | -         | -         | 6         | -         | -         | 0.25     | 6        |  |
| Dissolved lead          | g/m³       | <0.00010   | <0.00010  | <0.00010  | <0.00010  | -         | -         | <0.00010  | -         | -         | <0.00010 | <0.00010 |  |

| Parameter                     | Bore id                          | MW3 (GND2625)  27-Feb-17   26-May-17   28-Aug-17   16-Nov-17   22-Jul-19   14-Oct-19   17-Jan-20   30-Apr-20   20-Jul-20   Minimum   Maximum |           |           |           |           |           |           |           |           |          |          |  |
|-------------------------------|----------------------------------|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|----------|----------|--|
| Sample date                   | Unit                             | 27-Feb-17  | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum  | Maximum  |  |
| Dissolved magnesium           | g/m³                             | 5.3  | 5.7       | 7.3       | 6.8       | 6.5       | 9.4       | 9.7       | 10        | 10.1      | 5.3      | 10.1     |  |
| Dissolved manganese           | g/m³                             | 1.92   | 2.4       | 2.6       | 4.1       | -         | -         | 18.9      | -         | -         | 1.92     | 18.9     |  |
| Dissolved mercury             | g/m³                             | <0.00008   | <0.00008  | <0.00008  | <0.00008  | -         | -         | <0.00008  | -         | -         | <0.00008 | <0.00008 |  |
| Dissolved Nickel              | g/m³                             | < 0.0005   | <0.0005   | <0.0005   | 0.0006    | -         | -         | 0.0007    | -         | -         | <0.0005  | 0.0007   |  |
| Dissolved potassium           | g/m³                             | 4.1  | 4.6       | 4.4       | 4.2       | 3.7       | 4.7       | 4.6       | 5.1       | 5.7       | 3.7      | 5.7      |  |
| Dissolved sodium              | g/m³                             | 11   | 11.7      | 10.4      | 10.3      | 8.3       | 10.4      | 11.2      | 11.9      | 10.9      | 8.3      | 11.9     |  |
| Dissolved zinc                | g/m³                             | 0.007  | 0.0074    | 0.0045    | 0.0056    | -         | -         | 0.0173    | -         | -         | 0.0045   | 0.0173   |  |
| Chloride                      | g/m³                             | 13.4   | 11.7      | 9.9       | 12.6      | 29        | 12.1      | 12.3      | 12.8      | 13.6      | 9.9      | 29       |  |
| Fluoride                      | g/m³                             | < 0.05   | <0.05     | <0.05     | <0.05     | -         | -         | < 0.05    | -         | -         | < 0.05   | <0.05    |  |
| Total nitrogen                | g/m³                             | 0.5  | 0.77      | 0.7       | 0.35      | 0.56      | 0.78      | 0.52      | 0.56      | 1.29      | 0.35     | 1.29     |  |
| Ammoniacal nitrogen           | g/m³                             | 0.42   | 0.55      | 0.3       | 0.28      | 0.33      | 0.7       | 0.59      | 0.45      | 1.19      | 0.28     | 1.19     |  |
| Nitrite nitrogen              | g/m³ N                           | < 0.002  | <0.002    | <0.002    | <0.002    | <0.02     | <0.002    | 0.017     | 0.009     | <0.002    | <0.002   | 0.017    |  |
| Nitrate nitrogen              | g/m³ N                           | <0.002   | <0.002    | <0.002    | <0.002    | <0.02     | <0.002    | <0.002    | 0.009     | <0.002    | <0.002   | 0.009    |  |
| Nitrate & nitrite nitrogen    | g/m³ N                           | < 0.002  | <0.002    | <0.002    | <0.002    | <0.02     | <0.002    | 0.017     | 0.018     | <0.002    | < 0.002  | 0.018    |  |
| Total kjeldahl nitrogen       | g/m³                             | 0.5  | 0.77      | 0.7       | 0.35      | 0.55      | 0.78      | 0.5       | 0.54      | 1.29      | 0.35     | 1.29     |  |
| Dissolved reactive phosphorus | g/m³                             | < 0.004  | <0.004    | <0.004    | < 0.004   | <0.004    | <0.004    | <0.004    | <0.004    | <0.004    | < 0.004  | <0.004   |  |
| Dissolved reactive silica     | g/m³ SiO <sub>2</sub>            | 21   | 22        | 22        | 22        | -         | -         | 19.9      | -         | -         | 19.9     | 22       |  |
| Total phosphorus              | g/m³                             | 0.006  | 0.018     | 0.055     | 0.005     | 0.007     | 0.014     | 0.008     | 0.004     | 0.004     | 0.004    | 0.055    |  |
| Sulphate                      | g/m³                             | 9.8  | 9.6       | 6.3       | 12.1      | 9.4       | 13.3      | 12.4      | 13.4      | 15.5      | 6.3      | 15.5     |  |
| Biological oxygen demand      | g O <sub>2</sub> /m <sup>3</sup> | <2   | <2        | 5         | <2        | <2        | <2        | <2        | <2        | <2        | <2       | 5        |  |
| Chemical oxygen demand        | g O <sub>2</sub> /m <sup>3</sup> | <6   | <6        | 10        | <6        | <6        | 6         | <6        | <6        | 10        | <6       | 10       |  |
| Total organic carbon          | g/m³                             | <0.5   | <0.5      | 1.2       | <1        | 3.8       | 3.1       | <0.5      | 1.3       | 4.4       | <0.5     | 4.4      |  |
| Escherichia coli              | MPN/100mL                        | <1   | <1        | <1        | <1        | 1         | 7         | <1        | <1        | <1        | <1       | 7        |  |
| Formaldehyde                  | g/m³                             | <0.02  | <0.02     | <0.02     | <0.02     | -         | -         | <0.02     | -         | -         | <0.02    | <0.02    |  |

Table 9 Groundwater quality results GND3032-south

| Parameter               | Bore id    | MW6 (GND3032) |           |           |           |           |           |          |          |  |  |  |
|-------------------------|------------|---------------|-----------|-----------|-----------|-----------|-----------|----------|----------|--|--|--|
| Sample date             | Unit       | 31-Jan-19     | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum  | Maximum  |  |  |  |
| рН                      | рН         | 6.7           | 6.4       | 6.2       | 6.3       | 6.4       | 6.1       | 6.1      | 6.7      |  |  |  |
| Total alkalinity        | g/m³ CaCO₃ | 110           | 77        | 67        | 56        | 89        | 60        | 56       | 110      |  |  |  |
| Carbonate               | g/m³ CO₃   | <1.0          | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0     | <1.0     |  |  |  |
| Bicarbonate             | g/m³ HCO₃  | 134           | 94        | 82        | 69        | 109       | 74        | 69       | 134      |  |  |  |
| Total hardness          | g/m³ CaCO₃ | 108           | 103       | 82        | 67        | 96        | 76        | 67       | 108      |  |  |  |
| Electrical conductivity | mS/m       | 31.3          | 27.9      | 24.2      | 20.6      | 25.9      | 23.2      | 20.6     | 31.3     |  |  |  |
| Total suspended solids  | g/m³       | 680           | 33        | <3        | <3        | 128       | 124       | <3       | 680      |  |  |  |
| Total dissolved solids  | g/m³       | 200           | 191       | 150       | 158       | 220       | 147       | 147      | 220      |  |  |  |
| Dissolved aluminium     | g/m³       | 0.006         | -         | -         | < 0.003   | -         | -         | < 0.003  | 0.006    |  |  |  |
| Dissolved arsenic       | g/m³       | <0.0010       | -         | -         | <0.0010   | -         | -         | <0.0010  | <0.0010  |  |  |  |
| Dissolved barium        | g/m³       | 0.057         | -         | -         | 0.038     | -         | -         | 0.038    | 0.057    |  |  |  |
| Dissolved boron         | g/m³       | 0.014         | -         | -         | 0.013     | -         | -         | 0.013    | 0.014    |  |  |  |
| Dissolved cadmium       | g/m³       | <0.0005       | -         | -         | <0.00005  | -         | -         | <0.00005 | <0.00005 |  |  |  |
| Dissolved calcium       | g/m³       | 31            | 28        | 22        | 16.7      | 25        | 19.3      | 16.7     | 31       |  |  |  |
| Dissolved chromium      | g/m³       | 0.0022        | -         | -         | 0.0009    | -         | -         | 0.0009   | 0.0022   |  |  |  |
| Dissolved copper        | g/m³       | 0.0007        | -         | -         | 0.0014    | -         | -         | 0.0007   | 0.0014   |  |  |  |
| Dissolved iron          | g/m³       | <0.02         | -         | -         | <0.02     | -         | -         | <0.02    | <0.02    |  |  |  |
| Dissolved lead          | g/m³       | <0.00010      | -         | -         | <0.00010  | -         | -         | <0.00010 | <0.00010 |  |  |  |
| Dissolved magnesium     | g/m³       | 7.7           | 7.9       | 6.6       | 6.1       | 8.1       | 6.7       | 6.1      | 8.1      |  |  |  |
| Dissolved manganese     | g/m³       | 0.085         | -         | -         | 0.0024    | -         | -         | 0.0024   | 0.085    |  |  |  |
| Dissolved mercury       | g/m³       | <0.00008      | -         | -         | <0.00008  | -         | -         | <0.00008 | <0.00008 |  |  |  |
| Dissolved Nickel        | g/m³       | 0.0014        | -         | -         | 0.0006    | -         | -         | 0.0006   | 0.0014   |  |  |  |
| Dissolved potassium     | g/m³       | 1.83          | 1.66      | 1.61      | 1.6       | 1.52      | 1.51      | 1.51     | 1.83     |  |  |  |
| Dissolved sodium        | g/m³       | 21            | 15.4      | 13.2      | 13.2      | 15.1      | 14        | 13.2     | 21       |  |  |  |
| Dissolved zinc          | g/m³       | 0.0079        | -         | -         | 0.0027    | -         | -         | 0.0027   | 0.0079   |  |  |  |
| Chloride                | g/m³       | 14.5          | 19.4      | 15        | 13.4      | 13        | 16.7      | 13       | 19.4     |  |  |  |
| Fluoride                | g/m³       | <0.05         | -         | -         | < 0.05    | -         | -         | <0.05    | <0.05    |  |  |  |

| Parameter                     | Bore id                          | MW6 (GND3032) |           |           |           |           |           |         |         |  |  |  |  |
|-------------------------------|----------------------------------|---------------|-----------|-----------|-----------|-----------|-----------|---------|---------|--|--|--|--|
| Sample date                   | Unit                             | 31-Jan-19     | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum | Maximum |  |  |  |  |
| Total nitrogen                | g/m³                             | 5.4           | 5.8       | 6.0       | 5         | 4.9       | 4.3       | 4.3     | 6.0     |  |  |  |  |
| Ammoniacal nitrogen           | g/m³                             | 0.016         | <0.010    | <0.010    | <0.010    | <0.010    | <0.010    | <0.010  | 0.016   |  |  |  |  |
| Nitrite nitrogen              | g/m³ N                           | <0.002        | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002  | <0.002  |  |  |  |  |
| Nitrate nitrogen              | g/m³ N                           | 5.1           | 5.7       | 6         | 5         | 4.2       | 4.3       | 4.2     | 6       |  |  |  |  |
| Nitrate & nitrite nitrogen    | g/m³ N                           | 5.1           | 5.7       | 6         | 5         | 4.2       | 4.3       | 4.2     | 6       |  |  |  |  |
| Total kjeldahl nitrogen       | g/m³                             | 0.33          | <0.10     | <0.10     | <0.1      | 0.7       | <0.10     | <0.10   | 0.7     |  |  |  |  |
| Dissolved reactive phosphorus | g/m³                             | <0.004        | <0.004    | <0.004    | <0.004    | 0.004     | 0.004     | <0.004  | 0.004   |  |  |  |  |
| Dissolved reactive silica     | g/m³ SiO <sub>2</sub>            | 32            | -         | -         | 34        | -         | -         | 32      | 34      |  |  |  |  |
| Total phosphorus              | g/m³                             | 0.81          | 0.046     | <0.004    | 0.007     | 0.133     | 0.108     | <0.004  | 0.81    |  |  |  |  |
| Sulphate                      | g/m³                             | 6.3           | 8.2       | 5.6       | 3.8       | 5.3       | 7.8       | 3.8     | 8.2     |  |  |  |  |
| Biological oxygen demand      | g O <sub>2</sub> /m <sup>3</sup> | <2            | <2        | <2        | <2        | <2        | <2        | <2      | 0       |  |  |  |  |
| Chemical oxygen demand        | g O <sub>2</sub> /m <sup>3</sup> | <6            | <6        | <6        | <6        | 23        | <6        | <6      | 23      |  |  |  |  |
| Total organic carbon          | g/m³                             | 22            | 1.7       | 1.1       | <0.5      | <5        | <0.5      | <0.5    | 22      |  |  |  |  |
| Escherichia coli              | MPN / 100mL                      | <1            | <1        | <1        | <1        | <1        | <1        | <1      | <1      |  |  |  |  |
| Formaldehyde                  | g/m³                             | <0.02         | -         | -         | <0.02     | -         | -         | <0.02   | <0.02   |  |  |  |  |

Table 10 Groundwater quality results GND2484-south

| Parameter               | Bore id                |           |           |           |           | MW        | /4 (GND248 | 34)       |           |           |         |         |
|-------------------------|------------------------|-----------|-----------|-----------|-----------|-----------|------------|-----------|-----------|-----------|---------|---------|
| Sample date             | Unit                   | 27-Feb-17 | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19  | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum | Maximum |
| рН                      | рН                     | 6.3       | 6.4       | 6.2       | 6.2       | 5.9       | 6.1        | 6.2       | 6.3       | 6.0       | 5.9     | 6.4     |
| Total alkalinity        | g/m³ CaCO <sub>3</sub> | 30        | 32        | 30        | 32        | 27        | 30         | 37        | 39        | 31        | 27      | 39      |
| Carbonate               | g/m³ CO₃               | <1.0      | <1.0      | <1.0      | <1.0      | <1.0      | <1.0       | <1.0      | <1.0      | <1.0      | <1.0    | <1.0    |
| Bicarbonate             | g/m³ HCO₃              | 36        | 39        | 36        | 39        | 33        | 36         | 45        | 48        | 38        | 33      | 48      |
| Total hardness          | g/m³ CaCO₃             | 27        | 27        | 27        | 28        | 24        | 25         | 32        | 34        | 27        | 24      | 34      |
| Electrical conductivity | mS/m                   | 10.4      | 10.3      | 10.4      | 10.5      | 9.2       | 9          | 10.6      | 11.7      | 9.5       | 9       | 11.7    |
| Total suspended solids  | g/m³                   | 27        | 6         | 3         | <3        | <3        | <3         | <3        | <3        | <3        | 3       | 27      |
| Total dissolved solids  | g/m³                   | 85        | 69        | 81        | 79        | 65        | 61         | 85        | 85        | 72        | 61      | 85      |

| Parameter                     | Bore id               | MW4 (GND2484)  27-Feb-17   26-May-17   28-Aug-17   16-Nov-17   22-Jul-19   14-Oct-19   17-Jan-20   30-Apr-20   20-Jul-20   Minimum   Maximum |           |           |           |           |           |           |           |           |          |          |  |
|-------------------------------|-----------------------|--|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|----------|----------|--|
| Sample date                   | Unit                  | 27-Feb-17  | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum  | Maximum  |  |
| Dissolved aluminium           | g/m³                  | 0.013  | <0.003    | 0.004     | <0.003    | -         | -         | <0.003    | -         | -         | <0.003   | 0.013    |  |
| Dissolved arsenic             | g/m³                  | <0.0010  | <0.0010   | <0.0010   | <0.0010   | -         | -         | <0.0010   | -         | -         | <0.0010  | <0.0010  |  |
| Dissolved barium              | g/m³                  | 0.0061   | 0.0087    | 0.0079    | 0.009     | -         | -         | 0.012     | -         | -         | 0.0061   | 0.012    |  |
| Dissolved boron               | g/m³                  | 0.008  | 0.009     | 0.008     | 0.009     | -         | -         | 0.008     | -         | -         | 0.008    | 0.009    |  |
| Dissolved cadmium             | g/m³                  | <0.00005   | <0.00005  | <0.00005  | <0.00005  | -         | -         | <0.00005  | -         | -         | <0.00005 | <0.00005 |  |
| Dissolved calcium             | g/m³                  | 6.3  | 6.3       | 6.3       | 6.7       | 5.5       | 5.8       | 7         | 7.5       | 6.1       | 5.5      | 7.5      |  |
| Dissolved chromium            | g/m³                  | 0.0005   | <0.0005   | 0.0006    | 0.0005    | -         | -         | <0.0005   | -         | -         | <0.0005  | 0.0006   |  |
| Dissolved copper              | g/m³                  | <0.0005  | <0.0005   | <0.0005   | <0.0005   | -         | -         | 0.0058    | -         | -         | <0.0005  | 0.0058   |  |
| Dissolved iron                | g/m³                  | <0.02  | <0.02     | <0.02     | <0.02     | -         | -         | <0.02     | -         | -         | <0.02    | <0.02    |  |
| Dissolved lead                | g/m³                  | <0.00010   | <0.00010  | <0.00010  | <0.00010  | -         | -         | <0.00010  | -         | -         | <0.00010 | <0.00010 |  |
| Dissolved magnesium           | g/m³                  | 2.7  | 2.7       | 2.8       | 2.8       | 2.4       | 2.5       | 3.4       | 3.7       | 2.7       | 2.4      | 3.7      |  |
| Dissolved manganese           | g/m³                  | 0.0012   | 0.0015    | 0.0022    | 0.0021    | -         | -         | 0.0071    | -         | -         | 0.0012   | 0.0071   |  |
| Dissolved mercury             | g/m³                  | <0.00008   | <0.00008  | <0.00008  | <0.00008  | -         | -         | <0.00008  | -         | -         | <0.00008 | <0.00008 |  |
| Dissolved Nickel              | g/m³                  | <0.0005  | <0.0005   | <0.0005   | <0.0005   | -         | -         | <0.0005   | -         | -         | <0.0005  | <0.0005  |  |
| Dissolved potassium           | g/m³                  | 1.13   | 1.25      | 1.18      | 1.22      | 1.18      | 1.07      | 1.19      | 1.29      | 1.18      | 1.07     | 1.29     |  |
| Dissolved sodium              | g/m³                  | 9.2  | 9.3       | 8.9       | 8.7       | 7.9       | 8         | 9.9       | 10.3      | 8.7       | 7.9      | 10.3     |  |
| Dissolved zinc                | g/m³                  | 0.0033   | 0.0013    | <0.0010   | 0.0016    | -         | -         | 0.001     | -         | -         | <0.001   | 0.0033   |  |
| Chloride                      | g/m³                  | 8.1  | 7.1       | 7.6       | 7.5       | 7.1       | 6.8       | 6.8       | 7.4       | 7         | 6.8      | 8.1      |  |
| Fluoride                      | g/m³                  | <0.05  | <0.05     | <0.05     | <0.05     | -         | -         | <0.05     | -         | -         | <0.05    | <0.05    |  |
| Total nitrogen                | g/m³                  | 0.37   | 0.34      | 0.31      | 0.33      | 0.17      | 0.19      | 0.26      | 0.25      | 0.13      | 0.13     | 0.37     |  |
| Ammoniacal nitrogen           | g/m³                  | <0.010   | <0.010    | <0.010    | <0.010    | <0.010    | <0.010    | <0.010    | <0.010    | <0.010    | <0.010   | <0.010   |  |
| Nitrite nitrogen              | g/m³ N                | <0.002   | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002   | <0.002   |  |
| Nitrate nitrogen              | g/m³ N                | 0.34   | 0.29      | 0.29      | 0.28      | 0.153     | 0.169     | 0.23      | 0.22      | 0.126     | 0.126    | 0.34     |  |
| Nitrate & nitrite nitrogen    | g/m³ N                | 0.34   | 0.29      | 0.29      | 0.28      | 0.153     | 0.169     | 0.23      | 0.22      | 0.126     | 0.126    | 0.34     |  |
| Total kjeldahl nitrogen       | g/m³                  | <0.10  | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10    | <0.10    |  |
| Dissolved reactive phosphorus | g/m³                  | 0.012  | 0.011     | 0.01      | 0.013     | 0.005     | 0.009     | 0.016     | 0.015     | 0.008     | 0.005    | 0.016    |  |
| Dissolved reactive silica     | g/m³ SiO <sub>2</sub> | 25   | 24        | 25        | 26        | 0.009     | -         | 31        |           | -         | 0.009    | 31       |  |

| Parameter                | Bore id                          |           |           |           |           | MW        | /4 (GND248 | 34)       |           |           |         |         |
|--------------------------|----------------------------------|-----------|-----------|-----------|-----------|-----------|------------|-----------|-----------|-----------|---------|---------|
| Sample date              | Unit                             | 27-Feb-17 | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19  | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum | Maximum |
| Total phosphorus         | g/m³                             | 0.019     | 0.029     | 0.012     | 0.013     | 0.009     | 0.009      | 0.021     | 0.016     | 0.009     | 0.009   | 0.029   |
| Sulphate                 | g/m³                             | 6.3       | 6.0       | 5.7       | 6.1       | 3.8       | 4.8        | 5.0       | 6.0       | 4.9       | 3.8     | 6.3     |
| Biological oxygen demand | g O <sub>2</sub> /m <sup>3</sup> | <2        | <2        | <2        | <2        | <2        | <2         | <2        | <2        | <2        | <2      | <2      |
| Chemical oxygen demand   | g O <sub>2</sub> /m <sup>3</sup> | <6        | <6        | <6        | <6        | <6        | <6         | <6        | <6        | <6        | <6      | <6      |
| Total organic carbon     | g/m³                             | <0.5      | 0.8       | <0.5      | <1        | 1         | <0.5       | <0.5      | <0.5      | <0.5      | <0.5    | 1       |
| Escherichia coli         | MPN/100mL                        | <1        | <1        | <1        | <1        | <1        | <1         | <1        | <1        | <1        | <1      | <1      |
| Formaldehyde             | g/m³                             | <0.02     | <0.02     | <0.02     | <0.02     | -         | -          | <0.02     | -         | -         | <0.02   | <0.02   |

Table 11 Groundwater quality results GND2623-west

| Parameter               | Bore id    |           | MW1 (GND2623) 27-Feb-17   26-May-17   28-Aug-17   16-Nov-17   22-Jul-19   14-Oct-19   17-Jan-20   30-Apr-20   20-Jul-20   Minimum   Maximum |           |           |           |           |           |           |           |          |          |  |  |
|-------------------------|------------|-----------|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|----------|----------|--|--|
| Sample date             | Unit       | 27-Feb-17 | 26-May-17   | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum  | Maximum  |  |  |
| рН                      | рН         | 6.2       | 6.3   | 6.2       | 6.2       | 6.1       | 6.0       | 6.2       | 6.2       | 5.9       | 5.9      | 6.3      |  |  |
| Total alkalinity        | g/m³ CaCO³ | 39        | 43  | 39        | 48        | 44        | 45        | 58        | 68        | 40        | 39       | 68       |  |  |
| Carbonate               | g/m³ CO₃   | <1.0      | <1.0  | <1.0      | <1.0      | <1.0      | <1.0      | < 1.0     | <1.0      | <1.0      | <1.0     | <1.0     |  |  |
| Bicarbonate             | g/m³ HCO₃  | 47        | 52  | 47        | 59        | 53        | 55        | 71        | 82        | 49        | 47       | 82       |  |  |
| Total hardness          | g/m³ CaCO₃ | 33        | 32  | 35        | 39        | 41        | 39        | 46        | 56        | 38        | 32       | 56       |  |  |
| Electrical conductivity | mS/m       | 13        | 13.6  | 13.1      | 15.2      | 15.2      | 13.7      | 16        | 18.3      | 13        | 13       | 18.3     |  |  |
| Total suspended solids  | g/m³       | 13        | 8   | 8         | 18        | <3        | <3        | 11        | 3,200     | 22        | <3       | 3,200    |  |  |
| Total dissolved solids  | g/m³       | 100       | 86  | 89        | 106       | 92        | 89        | 128       | 151       | 82        | 82       | 151      |  |  |
| Dissolved aluminium     | g/m³       | 0.005     | <0.003  | <0.003    | <0.003    | -         | -         | <0.003    | -         | -         | <0.003   | 0.005    |  |  |
| Dissolved arsenic       | g/m³       | <0.0010   | <0.0010   | <0.0010   | <0.0010   | -         | -         | <0.0010   | -         | -         | <0.0010  | <0.0010  |  |  |
| Dissolved barium        | g/m³       | 0.0068    | 0.0077  | 0.0078    | 0.008     | -         | -         | 0.009     | -         | -         | 0.0068   | 0.009    |  |  |
| Dissolved boron         | g/m³       | 0.01      | 0.011   | 0.011     | 0.012     | -         | -         | 0.01      | -         | -         | 0.01     | 0.012    |  |  |
| Dissolved cadmium       | g/m³       | <0.00005  | <0.00005  | <0.00005  | <0.00005  | -         | -         | <0.00005  | -         | -         | <0.00005 | <0.00005 |  |  |
| Dissolved calcium       | g/m³       | 8.0       | 7.7   | 8.4       | 9.6       | 10.5      | 10.2      | 10.7      | 13.6      | 9.7       | 7.7      | 13.6     |  |  |
| Dissolved chromium      | g/m³       | <0.0005   | <0.0005   | 0.0005    | 0.0005    | -         | -         | <0.0005   | -         | -         | <0.0005  | 0.0005   |  |  |
| Dissolved copper        | g/m³       | <0.0005   | <0.0005   | 0.001     | 0.0017    | -         | -         | 0.0023    | -         | -         | <0.0005  | 0.0023   |  |  |

| Parameter                     | Bore id                          | MW1 (GND2623) 27-Feb-17   26-May-17   28-Aug-17   16-Nov-17   22-Jul-19   14-Oct-19   17-Jan-20   30-Apr-20   20-Jul-20   Minimum   Maximum |           |           |           |           |           |           |           |           |          |          |  |
|-------------------------------|----------------------------------|---|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|----------|----------|--|
| Sample date                   | Unit                             | 27-Feb-17   | 26-May-17 | 28-Aug-17 | 16-Nov-17 | 22-Jul-19 | 14-Oct-19 | 17-Jan-20 | 30-Apr-20 | 20-Jul-20 | Minimum  | Maximum  |  |
| Dissolved iron                | g/m³                             | <0.02   | <0.02     | <0.02     | <0.02     | -         | -         | <0.02     | -         | -         | <0.02    | <0.02    |  |
| Dissolved lead                | g/m³                             | <0.00010  | <0.00010  | <0.00010  | <0.00010  | -         | -         | 0.00012   | -         | -         | <0.00010 | <0.00010 |  |
| Dissolved magnesium           | g/m³                             | 3.2   | 3.1       | 3.3       | 3.7       | 3.6       | 3.4       | 4.7       | 5.4       | 3.2       | 3.1      | 5.4      |  |
| Dissolved manganese           | g/m³                             | 0.001   | 0.0012    | 0.0014    | 0.0013    | -         | -         | 0.0011    | -         | -         | 0.001    | 0.0014   |  |
| Dissolved mercury             | g/m³                             | <0.00008  | <0.00008  | <0.00008  | <0.00008  | -         | -         | <0.00008  | -         | -         | <0.00008 | <0.00008 |  |
| Dissolved Nickel              | g/m³                             | <0.0005   | <0.0005   | <0.0005   | <0.0005   | -         | -         | < 0.0005  | -         | -         | <0.0005  | <0.0005  |  |
| Dissolved potassium           | g/m³                             | 1.34  | 1.53      | 1.53      | 1.63      | 1.73      | 1.63      | 1.61      | 1.6       | 1.71      | 1.34     | 1.73     |  |
| Dissolved sodium              | g/m³                             | 12.7  | 14.9      | 12.8      | 13.3      | 11.6      | 11        | 14.9      | 14.3      | 10.3      | 10.3     | 14.9     |  |
| Dissolved zinc                | g/m³                             | 0.0024  | <0.0010   | <0.0010   | 0.0018    | -         | -         | 0.0011    | -         | -         | <0.0010  | 0.0024   |  |
| Chloride                      | g/m³                             | 9.2   | 8.7       | 8.9       | 8.6       | 9.6       | 9.9       | 8.2       | 11        | 8.8       | 8.2      | 11       |  |
| Fluoride                      | g/m³                             | <0.05   | <0.05     | <0.05     | <0.05     | -         | -         | <0.05     | -         | -         | <0.05    | <0.05    |  |
| Total nitrogen                | g/m³                             | 1.39  | 1.48      | 0.94      | 1.68      | 1.21      | 1.06      | 1.27      | 1.89      | 1.1       | 0.94     | 1.89     |  |
| Ammoniacal nitrogen           | g/m³                             | <0.010  | <0.010    | <0.010    | 0.012     | <0.010    | <0.010    | <0.010    | <0.010    | <0.010    | <0.010   | 0.012    |  |
| Nitrite nitrogen              | g/m³ N                           | <0.002  | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002    | <0.002   | <0.002   |  |
| Nitrate nitrogen              | g/m³ N                           | 1.32  | 1.45      | 0.91      | 1.62      | 1.17      | 1.02      | 1.26      | 1.38      | 1.01      | 0.91     | 1.62     |  |
| Nitrate & nitrite nitrogen    | g/m³ N                           | 1.32  | 1.45      | 0.91      | 1.62      | 1.17      | 1.02      | 1.26      | 1.38      | 1.01      | 0.91     | 1.62     |  |
| Total kjeldahl nitrogen       | g/m³                             | <0.10   | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | <0.10     | 0.51      | <0.10     | <0.10    | 0.51     |  |
| Dissolved reactive phosphorus | g/m³                             | 0.012   | 0.01      | 0.008     | 0.011     | <0.004    | 0.007     | 0.014     | 0.004     | 0.005     | <0.004   | 0.014    |  |
| Dissolved reactive silica     | g/m³ SiO <sub>2</sub>            | 25  | 23        | 22        | 27        | -         | -         | 32        | -         | -         | 22       | 32       |  |
| Total phosphorus              | g/m³                             | 0.016   | 0.019     | 0.011     | 0.026     | 0.006     | 0.004     | 0.025     | 2.2       | 0.02      | 0.004    | 2.2      |  |
| Sulphate                      | g/m³                             | 5.0   | 4.6       | 4.8       | 5.5       | 3.8       | 4.2       | 3.9       | 4.8       | 4.8       | 3.8      | 5.5      |  |
| Biological oxygen demand      | g O <sub>2</sub> /m <sup>3</sup> | <2  | <2        | <2        | <2        | <2        | <2        | <2        | <2        | <2        | <2       | <2       |  |
| Chemical oxygen demand        | g O <sub>2</sub> /m <sup>3</sup> | <6  | <6        | <6        | <6        | <6        | <6        | <6        | 13        | 12        | <6       | 13       |  |
| Total organic carbon          | g/m³                             | 0.9   | <0.5      | <0.5      | <1        | 1.5       | <0.5      | <0.5      | 2.7       | 2.7       | <0.5     | 2.7      |  |
| Escherichia coli              | MPN/100mL                        | <1  | <1        | <1        | <1        | <1        | <1        | <1        | <1        | <1        | <1       | <1       |  |
| Formaldehyde                  | g/m³                             | <0.02   | <0.02     | <0.02     | <0.02     | -         | -         | <0.02     | -         | -         | <0.02    | <0.02    |  |

#### 2.3.3 Groundwater level monitoring

Groundwater level data was collected electronically at 15 minute intervals using in-situ level loggers. Data was downloaded quarterly.

A comparison with rainfall data collected in the nearby Waiwhakaiho at Egmont Village rainfall site is included as Figure 3. An assessment of the data confirms all groundwater levels respond to sustained periods of rainfall recharge.

A summary of the range of groundwater levels at the site and the minimum required depth to water for each type of internment are included in Table 12 below. The Table indicates that some areas are not suitable for some types of burials.

Table 12 Groundwater level range and burial type

| Site code | Area  | Conventional<br>double<br>burial<br>Minimum<br>depth of<br>burial is 2 m<br>BGL | Conventional single burial Minimum depth of burial is 1.2 m BGL | Natural<br>grave<br>Minimum<br>depth of<br>burial is<br>1.0 m<br>BGL | rar  | r level<br>nge<br>3GL) | Range | Continuous<br>groundwater<br>level data<br>(15 min.<br>interval) |      |
|-----------|-------|---|---|--|------|------------------------|-------|--|------|
|           |       |   | uired depth to hable (m BGL)                                    | nigh water   | High | Low                    | (m)   | Commenced  |      |
| GND2627   | north |   |   |  | 1.44 | 5.11                   | 3.67  | 4 Mar 2017   |      |
| GND2624   | north |   |   |  | 0.20 | >5.45                  | >5.25 | 4 Mar 2017   |      |
| GND2625   | east  | 2.0   | 2.0   | 1.0  | 0.63 | 4.44                   | 3.81  | 14 May 2018  |      |
| GND3032   | south | 2.8   |   | 2.0  | 2.0  | 1.8                    | 2.46  | 6.08   | 3.62 |
| GND2484   | south |   |   |  | 2.72 | 5.18                   | 2.46  | 19 Mar 2018  |      |
| GND2623   | west  |   |   |  | 2.20 | 5.64                   | 3.44  | 4 Mar 2017   |      |

Groundwater level data is illustrated for all six monitored sites in Figure 4 to Figure 9 the minimum depth to water required for both conventional single burials (orange line) and natural burials (green line) have been added for reference.

An assessment of the data indicates that groundwater levels are high and fluctuate significantly in GND2624 and GND2627, ranging from <0.5 m BGL during the wetter months to >5 m BGL in the drier months (Figure 4 and Figure 5). The flat-lined data seen in March 2019 and March-April 2020 in GND2624 is anomalous. The data is likely an artefact of groundwater levels exceeding the level loggers design range. GND2625 also exhibits high groundwater levels, fluctuating between <1 m BGL and >4 m BGL (Figure 6). Groundwater levels in GND2623, GND2484 and GND3032 are slightly more subdued and fluctuate to a lesser degree (Figure 7, Figure 8 and Figure 9). The greater fluctuations seen to the north and east may be a result of enhanced recharge, due to the close proximity of the forested hills to the north of the Cemetery.

Groundwater level data indicates that Area-A and Area-B are not suitable for double plot stacked conventional burials which require internment to a minimum depth of 2 m BGL. Groundwater levels also indicate that the northern section and potentially the eastern section of Area-A are also not suitable for conventional single plot burials (1.2 m BGL) or natural graves (1 m BGL).

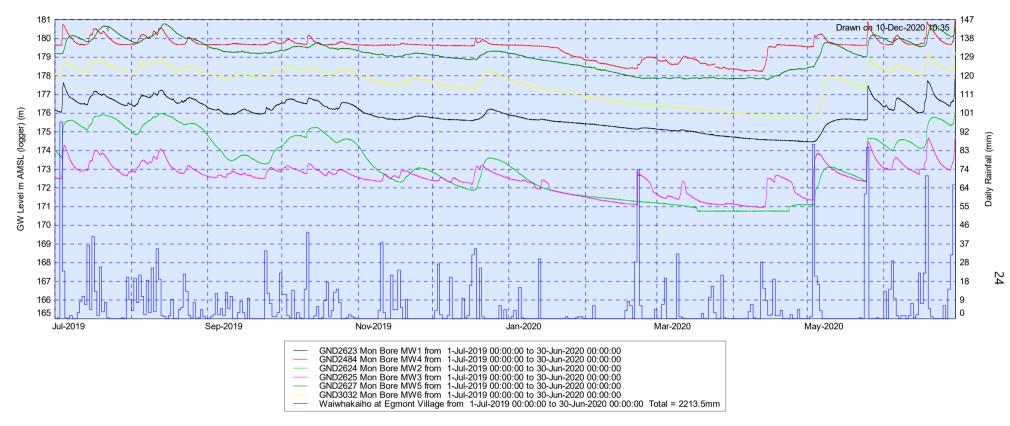


Figure 3 Groundwater elevations 2019-2020 in comparison to rainfall

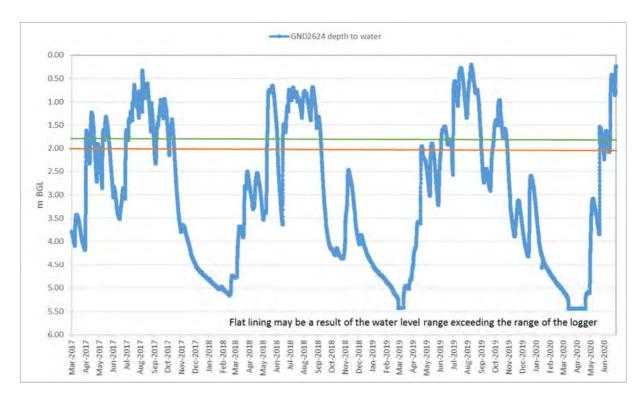


Figure 4 Groundwater levels GND2624-north

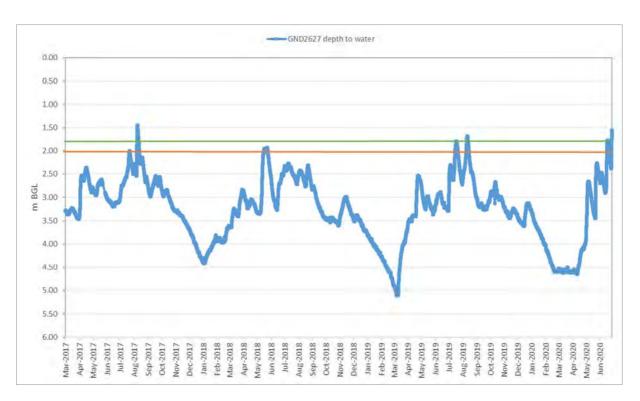


Figure 5 Groundwater levels GND2627-north

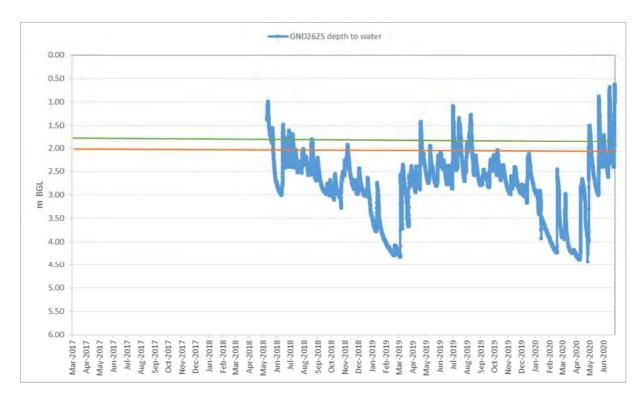


Figure 6 Groundwater levels GND2625-east



Figure 7 Groundwater levels GND2623-west

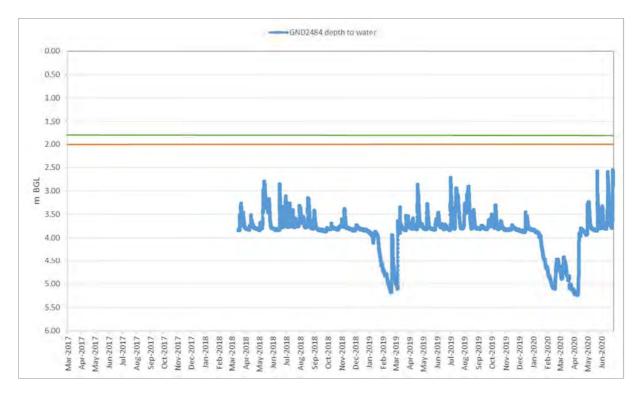


Figure 8 Groundwater levels GND2484-south



Figure 9 Groundwater levels GND3032-south

### 2.4 Investigations, interventions and incidents

The monitoring programme for the year was based on what was considered to be an appropriate level of monitoring, review of data, and liaison with NPDC and or their representatives. During the year matters may arise which require additional activity by the Council, for example provision of advice and information, or investigation of potential or actual causes of non-compliance or failure to maintain good practices. A proactive approach that in the first instance avoids issues occurring is favoured.

The Council operates and maintains a register of all complaints or reported and discovered excursions from acceptable limits and practices, including non-compliance with consents, which may damage the environment. The incident register includes events where NPDC concerned has itself notified the Council. The register contains details of any investigation and corrective action taken.

Complaints may be alleged to be associated with a particular site. If there is potentially an issue of legal liability, the Council must be able to prove by investigation that the identified company is indeed the source of the incident (or that the allegation cannot be proven).

In the 2019-2020 period, the Council was not required to undertake significant additional investigations and interventions, or record incidents, in association with the Company's conditions in resource consents or provisions in Regional Plans.

### 3 Discussion

## 3.1 Discussion of site performance

The Cemetery opened to the public in May 2019 and the compliance monitoring programme commenced following the first internment in July 2019.

An inspection of the site during the monitoring period found it to be in good condition and being well managed. The monitoring programme was undertaken as required and data was provided to the Council for review in a timely manner.

Groundwater levels indicated that Area-A and Area-B, are both unsuitable for conventional double plots (2 m depth) and that the northern and eastern areas of Area-A due to high groundwater levels may also be unsuitable for conventional single and natural burials. To date three double plot burials have taken place in Area-B at the slightly shallower depth of 1.8 m to ensure that the burials meet the minimum depth above groundwater requirement in the consent. Figure 10 shows the areas allocated to each type of internment.

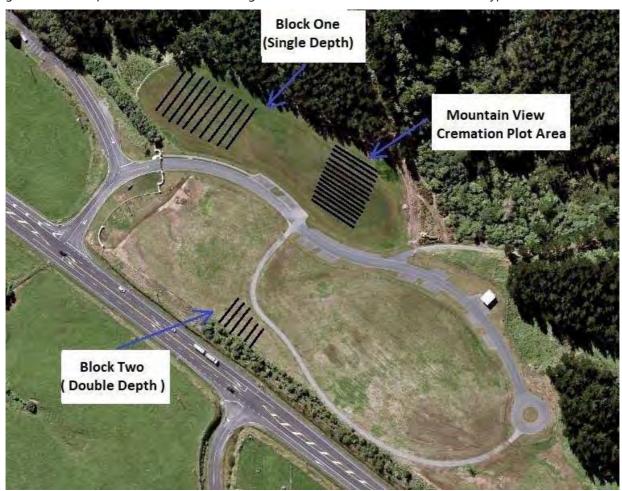


Figure 10 Type of internment planned for Area-A and Area-B

The burial plan (Figure 2) contained a provision for up to 150 internments comprising of 75 in Area-A and 75 in Area-B during the first year of operation.

Since the Cemetery opened the following internments have taken place:

- Area-A (Block 1 and cremation plot area)
  - o 23 ash burials 60 cm depth;
  - o 4 ash burials at 40 cm depth;

- o 1 casket single depth burial at 1 m depth; and
- Area-B (Block 2)
  - o 3 casket double plot burials at 1.8 m depth.

The number of internments undertaken at the Cemetery were significantly lower than shown in the burial plan due to continued availability of plots at the Awanui and Te-Henui cemeteries. The number of internments is expected to rise significantly when the other two cemeteries close.

#### 3.2 Environmental effects of exercise of consents

The groundwater and surface water monitoring components of this programme continued during the period under review, with 30 groundwater samples and 6 surface water samples taken from monitoring sites in the vicinity of the Cemetery. The results of the monitoring carried out show that the groundwater and surface water composition has remained relatively stable since monitoring commenced.

Groundwater and surface water monitoring included the sampling and analysis of a comprehensive suite of general water quality parameters and any contaminants related to the degradation of human remains. The monitoring programme also included the collection of groundwater level data from six bores. The data collected will allow for an in depth assessment of any variations in groundwater and surface water composition should the need arise in the future.

Surface water chemistry exhibited a distinct seasonal change. Groundwater composition in each bore remained relatively stable with only slight changes resulting from natural seasonal fluctuation and sampling variability. Groundwater composition differed slightly between bores due to depth and redox conditions.

An assessment of the groundwater level data concluded that groundwater levels fluctuate in response to rainfall and are slightly higher in the northern and eastern areas of the site close to the forested hills. The range of levels differs between bores with the greatest range (>5 m) seen in GND2624.

There is no evidence to suggest that any activity undertaken at the Cemetery during the review period have had any adverse effect on local groundwater or surface water quality.

No complaints were received from the public with regard to the discharge consent during the period under review, and no incidents were recorded by the Council.

Compliance with the conditions of NPDC's discharge consent during the review period is summarised below in Section 3.3.

# 3.3 Evaluation of performance

A tabular summary of the consent holder's compliance record for the year under review is set out in Table 13. A summary of the consent holder's compliance record from 2018 is set out in Table 14.

Table 13 Summary of performance for consent 7882-1.1

| Pu                    | rpose: To discharge contaminants into land at a cemetery in circumstances where they may enter water |  |                      |  |  |  |
|-----------------------|--|--|----------------------|--|--|--|
| Condition requirement |  | Means of monitoring during period under review | Compliance achieved? |  |  |  |
| 1.                    | Burials to occur within designated areas   | Review burial plan                             | Yes                  |  |  |  |
| 2.                    | Burials must occur more than 50 m from a surface water body  | Review of burial plan                          | Yes                  |  |  |  |

| Purpose: To discharge contaminants into land at a cemetery in circumstances where they may enter water |  |  |                      |  |  |  |  |
|--|--|--|----------------------|--|--|--|--|
|  | Condition requirement  | Means of monitoring during period under review   | Compliance achieved? |  |  |  |  |
| 3.   | Best practicable option condition  | Report and site inspections                      | Yes                  |  |  |  |  |
| 4.   | Reporting provision  | Receipt of report                                | Yes                  |  |  |  |  |
| 5.   | Provision of a report detailing how compliance with Condition 3 will be achieved | Receipt of report                                | Yes                  |  |  |  |  |
| 6.   | Notification requirement   | Receipt of notification                          | Yes                  |  |  |  |  |
| 7.   | Lapse condition  | Commencement of activity prior to lapse date     | N/A                  |  |  |  |  |
| 8.   | Optional review provision re environmental effects                               | Option not available. Next review date June 2026 | N/A                  |  |  |  |  |
| Ov   | High   |  |                      |  |  |  |  |
| Ov   | High   |  |                      |  |  |  |  |

During the year, NPDC demonstrated a high level of environmental and administrative performance with the resource consents as defined in Section 1.1.4.

Table 14 Evaluation of environmental performance since 2018

| Year      | Consent no | High | Good | Improvement required | Poor |
|-----------|------------|------|------|----------------------|------|
| 2019-2020 | 7882-1.1   | 1    | -    | -                    | -    |
| 2018-2019 | 7882-1.0   | 1    | -    | -                    | -    |
| Totals    | -          | 2    | -    | -                    | -    |

## 3.4 Recommendations from the 2018-2019 Annual Report

- 1. THAT once internments begin the groundwater and surface water quality monitoring programme recommences; and
- 2. THAT groundwater level monitoring using in-situ electronic level loggers at 15 min intervals continues in all six bores.
- 3. THAT should there be issues with environmental or administrative performance in 2019-2020, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.
- 4. THAT the option for a review of resource consents in June 2020, as set out in the respective consent conditions not be exercised.

The recommendations above were implemented during the period under review.

# 3.5 Alterations to monitoring programmes for 2020-2021

In designing and implementing the monitoring programmes for air/water discharges in the region, the Council has taken into account:

• the extent of information already made available through monitoring or other means to date;

- its relevance under the RMA;
- the Council's obligations to monitor consented activities and their effects under the RMA;
- · the record of administrative and environmental performances of the consent holder; and
- · reporting to the regional community.

The Council also takes into account the scope of assessments required at the time of renewal of permits, and the need to maintain a sound understanding of industrial processes within Taranaki exercising resource consents.

It is proposed that for 2020-2021:

- 1. THAT in the first instance, monitoring of consented activities in the 2020-2021 year continue at the same level as in 2019-2020.
- 2. THAT should there be issues with environmental or administrative performance in 2020-2021, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

It should be noted that the proposed programme represents a reasonable and risk-based level of monitoring for the site(s) in question. The Council reserves the right to subsequently adjust the programme from that initially prepared, should the need arise if potential or actual non-compliance is determined at any time during 2020-2021.

## 4 Recommendations

- 1. THAT in the first instance, monitoring of consented activities in the 2020-2021 year continue at the same level as in 2019-2020.
- 2. THAT should there be issues with environmental or administrative performance in 2020-2021, monitoring may be adjusted to reflect any additional investigation or intervention as found necessary.

# Glossary of common terms and abbreviations

The following abbreviations and terms may be used within this report:

Al\* Aluminium.
As\* Arsenic.

BOD Biochemical oxygen demand. A measure of the presence of degradable organic

matter, taking into account the biological conversion of ammonia to nitrate.

BODF Biochemical oxygen demand of a filtered sample.

CBOD Carbonaceous biochemical oxygen demand. A measure of the presence of

degradable organic matter, excluding the biological conversion of ammonia to

nitrate.

COD Chemical oxygen demand. A measure of the oxygen required to oxidise all matter in

a sample by chemical reaction.

Conductivity Conductivity, an indication of the level of dissolved salts in a sample, usually

measured at 25°C and expressed in µS/cm.

DO Dissolved oxygen.

DRP Dissolved reactive phosphorus.

E.coli Escherichia coli, an indicator of the possible presence of faecal material and

pathological micro-organisms. Usually expressed as colony forming units per 100

millilitre sample.

F Fluoride.

FC Faecal coliforms, an indicator of the possible presence of faecal material and

pathological micro-organisms. Usually expressed as colony forming units per 100

millilitre sample.

g/m³ Grams per cubic metre, and equivalent to milligrams per litre (mg/L). In water, this is

also equivalent to parts per million (ppm), but the same does not apply to gaseous

mixtures.

Incident An event that is alleged or is found to have occurred that may have actual or

potential environmental consequences or may involve non-compliance with a consent or rule in a regional plan. Registration of an incident by the Council does

not automatically mean such an outcome had actually occurred.

Intervention Action/s taken by Council to instruct or direct actions be taken to avoid or reduce

the likelihood of an incident occurring.

Investigation Action taken by Council to establish what were the circumstances/events

surrounding an incident including any allegations of an incident.

Incident Register The Incident Register contains a list of events recorded by the Council on the basis

that they may have the potential or actual environmental consequences that may

represent a breach of a consent or provision in a Regional Plan.

L/s Litres per second. m³ Cubic Metres:

m BGL Metres below ground level

mS/m Millisiemens per metre.

μS/cm Microsiemens per centimetre

NH<sub>4</sub> Ammonium, normally expressed in terms of the mass of nitrogen (N).

NH<sub>3</sub> Unionised ammonia, normally expressed in terms of the mass of nitrogen (N).

NNN Nitrate and nitrate combined, expressed in terms of the mass of nitrogen (N).

NO<sub>3</sub> Nitrate, normally expressed in terms of the mass of nitrogen (N).

pH A numerical system for measuring acidity in solutions, with 7 as neutral. Numbers

lower than 7 are increasingly acidic and higher than 7 are increasingly alkaline. The scale is logarithmic i.e. a change of 1 represents a ten-fold change in strength. For

example, a pH of 4 is ten times more acidic than a pH of 5.

Physicochemical Measurement of both physical properties (e.g. temperature, clarity, density) and

chemical determinants (e.g. metals and nutrients) to characterise the state of an

environment.

Resource consent Refer Section 87 of the RMA. Resource consents include land use consents (refer

Sections 9 and 13 of the RMA), coastal permits (Sections 12, 14 and 15), water

permits (Section 14) and discharge permits (Section 15).

Redox Short for reduction-oxidation. A redox reaction is a chemical reaction that involves a

transfer of electrons between two species. Groundwater can be reduced (low in

oxygen) or oxidised (high in oxygen).

RMA Resource Management Act 1991 and including all subsequent amendments.

SS Suspended solids.

Temp Temperature, measured in °C (degrees Celsius).

Turb Turbidity, expressed in NTU.

UI Unauthorised Incident.

Zn\* Zinc.

\*an abbreviation for a metal or other analyte may be followed by the letters 'As', to denote the amount of metal recoverable in acidic conditions. This is taken as indicating the total amount of metal that might be solubilised under extreme environmental conditions. The abbreviation may alternatively be followed by the letter 'D', denoting the amount of the metal present in dissolved form rather than in particulate or solid form.

For further information on analytical methods, contact a Science Services Manager.

# Bibliography and references

- Environment Agency 2004. Assessing the groundwater pollution potential of cemetery developments.
- Geosearch Limited 2018. Mangapouri Cemetery, pre-burial groundwater level and water quality assessment. 26 April 2018
- Ministry of Health 2008. Drinking-Water Standards for New Zealand 2005 (Revised 2008) Wellington: Ministry of Health.
- Scottish Environment Protection Agency (SEPA) 2015. Land Use Planning System SEPA Guidance Note, Guidance on assessing the impacts of Cemeteries on Groundwater Version 3.
- Taranaki Regional Council (2018). 2019-67 New Plymouth District Council Mangapouri Cemetery monitoring programme annual report 2018-2019. Frodo id 2245542
- World Health Organisation 1998. The impacts of cemeteries on the environment and public health An introductory briefing.

# Appendix I

# Resource consent held by New Plymouth District Council

(For a copy of the signed resource consent please contact the TRC Consents department)

#### Water abstraction permits

Section 14 of the RMA stipulates that no person may take, use, dam or divert any water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or it falls within some particular categories set out in Section 14. Permits authorising the abstraction of water are issued by the Council under Section 87(d) of the RMA.

#### Water discharge permits

Section 15(1)(a) of the RMA stipulates that no person may discharge any contaminant into water, unless the activity is expressly allowed for by a resource consent or a rule in a regional plan, or by national regulations. Permits authorising discharges to water are issued by the Council under Section 87(e) of the RMA.

#### Air discharge permits

Section 15(1)(c) of the RMA stipulates that no person may discharge any contaminant from any industrial or trade premises into air, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising discharges to air are issued by the Council under Section 87(e) of the RMA.

#### Discharges of wastes to land

Sections 15(1)(b) and (d) of the RMA stipulate that no person may discharge any contaminant onto land if it may then enter water, or from any industrial or trade premises onto land under any circumstances, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Permits authorising the discharge of wastes to land are issued by the Council under Section 87(e) of the RMA.

#### Land use permits

Section 13(1)(a) of the RMA stipulates that no person may in relation to the bed of any lake or river use, erect, reconstruct, place, alter, extend, remove, or demolish any structure or part of any structure in, on, under, or over the bed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Land use permits are issued by the Council under Section 87(a) of the RMA.

#### Coastal permits

Section 12(1)(b) of the RMA stipulates that no person may erect, reconstruct, place, alter, extend, remove, or demolish any structure that is fixed in, on, under, or over any foreshore or seabed, unless the activity is expressly allowed for by a resource consent, a rule in a regional plan, or by national regulations. Coastal permits are issued by the Council under Section 87(c) of the RMA.

# Discharge Permit Pursuant to the Resource Management Act 1991 a resource consent is hereby granted by the Taranaki Regional Council

Name of New Plymouth District Council

Consent Holder: Private Bag 2025

New Plymouth 4342

**Decision Date** 

(Change):

28 May 2018

**Commencement Date** 

(Change):

28 May 2018 (Granted Date: 9 November 2011)

#### **Conditions of Consent**

Consent Granted: To discharge contaminants into land at a cemetery in

circumstances where they may enter water

Expiry Date: 1 June 2046

Review Date(s): June 2020, June 2026, June 2032, June 2038

Site Location: 279 Junction Road, New Plymouth

Grid Reference (NZTM) 1697558E-5667612N

Catchment: Waiwhakaiho

For General, Standard and Special conditions pertaining to this consent please see reverse side of this document

#### **General condition**

a. The consent holder shall pay to the Taranaki Regional Council all the administration, monitoring and supervision costs of this consent, fixed in accordance with section 36 of the Resource Management Act 1991.

#### **Special conditions**

- 1. This consent authorises the discharge of contaminants to land associated with the burial of deceased persons at a cemetery. Subject to the other conditions of this consent, burials shall occur only in the areas identified as 'potential burial areas' on the plan titled 'Location of burial areas' attached to this document.
- 2. No burial shall occur within 50 metres of any surface water body.
- 3. The consent holder shall at all times adopt the best practicable option, as defined in section 2 of the Resource Management Act 1991, to prevent or minimise any actual or likely adverse effect on the environment associated with the discharge. The best practicable option includes, but is not limited to:
  - a) ensuring graves are no deeper than 0.8 metres above the seasonally high watertable; and
  - b) spreading the burials, in both time and location, to reduce point source loading of contaminants.
- 4. At least three months before the first burial, and at five-yearly intervals thereafter, the consent holder shall provide the Chief Executive, Taranaki Regional Council with a plan showing the specific areas where burials will occur.
- 5. The consent holder shall prepare a report that details how compliance with condition 3 will be achieved. The report shall be submitted for the approval of the Chief Executive, Taranaki Regional Council, acting in a certification capacity, at least three months before the first burial, and at five-yearly intervals thereafter.
- 6. The consent holder shall notify the Chief Executive, Taranaki Regional Council, in writing of the date that the cemetery will become operative, at least 1 month before. Notification shall include the consent number and a brief description of the activity consented and shall be emailed to <a href="worknotification@trc.govt.nz">worknotification@trc.govt.nz</a>.
- 7. This consent shall lapse on 31 December 2021, unless the consent is given effect to before the end of that period or the Taranaki Regional Council fixes a longer period pursuant to section 125(1)(b) of the Resource Management Act 1991.

#### Consent 7882-1.1

8. In accordance with section 128 and section 129 of the Resource Management Act 1991, the Taranaki Regional Council may serve notice of its intention to review, amend, delete or add to the conditions of this resource consent by giving notice of review during the month of June 2014 and/or June 2020 and/or 2026 and/or June 2032 and/or June 2038 and for the purpose of ensuring that the conditions are adequate to deal with any adverse effects on the environment arising from the exercise of this resource consent, which were either not foreseen at the time the application was considered or which it was not appropriate to deal with at the time.

Signed at Stratford on 28 May 2018

For and on behalf of Taranaki Regional Council

A D McLay

**Director - Resource Management**