



26 February 2016

The Manager
The Environmental Regulation Department
Greater Wellington Regional Council
PO Box 11646
Wellington 6142
info@gw.govt.nz

Dear Sir/Madam

**Re: Resource Management Act 1991
Submission on Taylor Preston Discharge Consent renewal to discharge
contaminants to air associated with the proposed long term upgrade and
operation of the Kiwi Point Abattoir
WGN 160137 (33809)**

Submitter: Dr Stephen Palmer, Medical Officer of Health
on behalf of Regional Public Health

Contact Details: Regional Public Health
Hutt Valley District Health Board
Private Bag 31-907
Lower Hutt
Telephone: (04) 5709002 Fax: (04) 570 9211

Regional Public Health serves the greater Wellington region, through its three district health boards (DHBs): Wairarapa, Hutt Valley and Capital & Coast and is a service of the Hutt Valley District Health Board.

We work with our community to make it a healthier safer place to live. We promote good health, prevent disease, and improve the quality of life for our population, with a particular focus on children, Māori and working with primary care organisations. Our staff includes a range of occupations such as: medical officers of health, public health advisors, health protection officers, public health nurses, and public health analysts.

Reasons for submitting

The reason for this submission is to ensure that the public health risks associated with the proposed activity are considered. The Ministry of Health requires us to reduce potential health risks by various means, which includes making submissions on resource consent matters. The submitter is **neutral** and neither supports nor opposes the application.

Regional Public Health could not gain an advantage in trade competition through this submission.

Regional Public Health agrees that odour should be considered the key issue with air discharges from the Taylor Preston operation. There has been a history of odour effects that were unacceptable to the community which have resulted in complaints.

Over the years, Taylor Preston has undertaken a range of measures to improve odour from the rendering plant, blood processing activities and stock yard management, to address concerns raised by neighbours and GWRC.

Complaints notified to the Greater Wellington Regional Council have decreased from a high of 230 in 2003 to a yearly average of 15 over the past 3 years.

The impact of odour is to annoy people and if severe enough will create a nuisance. It therefore has the potential to adversely affect quality of life. Normally, odour is not associated with any direct health effect, but more with personal stress and annoyance, which in turn may manifest as a health effect.

The main concern with odour at the level and nature of that emitted by the plant in the past is its ability to cause an effect that could be considered objectionable or offensive. Whether an odour has an objectionable or offensive effect will depend on the frequency, intensity duration, offensiveness (or character) and location of the odour event. Different combinations of these factors can cause result in adverse effects. All of these factors should be taken into account when investigating odour complaints.

Because the receiving environment off the boundary is residential it should be considered a highly sensitive location and effective odour control mechanisms to prevent odours crossing the boundary.

Resolution

The decision sought in the event that the application is granted is the imposition of adequate conditions to protect the health of people and communities including that:

- The applicant is required to have put in place a formal odour management plan including provision for contingencies in the event of equipment failure.
- That a consent condition requiring a formal public complaint receipt, registration and investigation process with provision for regular community consultation group meetings.
- That there shall be no objectionable or offensive odour to the extent that it causes an adverse effect at or beyond the boundary of the site.

We **do not** wish to be heard in support of our submission.

We have served a copy of this submission on the applicant. We are happy to provide further advice or clarification on any of the points raised in our written submission. The contact point for this submission is:

Campbell Gillam
Heath Protection Officer
Regional Public Health Wairarapa
PO Box 96, Masterton
06 377 9134, 027 2415906
Campbell.Gillam@wairarapa.dhb.org.nz

Kind regards

Dr Stephen Palmer
Medical Officer of Health

Peter Gush
Service Manager