

## Appendix V



## Summary of submissions

### Taha Fertiliser Industries Ltd

Land use consent LU 2014/95

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**Southland District Council**  
PO Box 903  
Invercargill

Neutral

Does not wish to be heard  
*Original submission page 212*

**Submission summary:**

The boundary between districts is 6km south of Mataka and the SDC is concerned about possible downstream effects including potential effects on the Edendale/Wyndham water supply intakes. The SDC stance is neutral and they seek that the following measures be incorporated into any decision making process:

- Provision by Taha Asia Pacific of a 'safety report' and documentation prepared by a suitably qualified person advising of compliance with the approved Code of Practice for Managing Hazards to Prevent Major Industrial Accidents, 1994. (Direction is given to information on the internet).
- Provision by Taha Asia Pacific Limited of a compliant safety data sheet for Ouvea Pre-mix; The sheet provided is 'draft', and does not comply with either the data sheet requirements of either activities, Process Chemicals and Raw Materials (Subsidiary Hazard) Group Standard 2006 or the Hazardous Substances (Identification) Regulations 2001.
- Provision by Taha Asia Pacific Limited of comment with regard to approved handler compliance at the Ouvea processing sites in Invercargill, and comment on on-going managerial oversight of this storage.
- Imposition by the Gore District Council of suitable monitoring conditions so as to ensure that the conditions imposed on any resource consent are complied with fully, and (where appropriate) on an on-going basis.
- Submission of a detailed Emergency Management Plan specifically detailing incident management procedures in the event of an accidental release of chemicals to air and/or water.

**Ngair Elizabeth McGowan**  
15 Doctors Point Road  
Mataka

Oppose

Does not wish to be heard  
*Original submission page 174*

**Submission summary:**

- Timeframe at 24 months is too long and states that building is old and therefore concerned about performance of building in adverse weather.
- Mataka residents deserve assurance of a shorter timeframe as concerned that accidents can happen which put the health of the public at risk.
- Considers that two to four weeks only should be allowed to clear the site.

**Jenny Soper**  
166 Kana Street  
Mataka

Oppose

Does not wish to be heard  
*Original submission page 82*

**Submission summary:**

- Concerned about risk due to structural issues with the 100 year old building and possible earthquake issues.
- Concerned about the proximity of the river and possible flood problems and the resulting adverse effects on people and the environment.
- Suggests that the company put up a bond for the Mataka community.

**Emily Constance Hall**  
2F Siena Terraces  
6 Burgoyne Street  
Auckland

Oppose

Does not wish to be heard  
*Original submission page 48*

**Submission summary:**

- Expresses strong opposition and surprise that the Council is considering the application due to 'disastrous and negative' impacts of various chemicals, waste and by-products on the environment.
- Does not understand why the Gore District Council considers that the application is remotely feasible.

**Shari-Kay-Smith**  
Southern Estate Properties  
10 Bridge Street,  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 198*

**Submission summary:**

- States that the town is already struggling without having a highly toxic substance stored there.
- Is concerned about the proximity of residential properties;
- Is concerned about the proximity of the river and possible flooding and toxic effects on fish.
- Is concerned that the development will stop people moving to the town.
- Thinks that the Gore District Council wouldn't allow the proposal in Gore.
- Does not want to see any consent issued and that the substance should be removed altogether.

**Geoffrey Trevor Colvin**  
25 Bangor Street  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 65*

**Submission summary:**

- Building suitability – a final building report is not available prior to submissions closing therefore there is no proof that the suitability of the site can be supported.
- Activity description – The start and end dates of the two year storage period are not clearly established.
- Environmental Effects – is not satisfied with descriptions in the application about the possibility of water ingress taking place slowly over long periods – also concerned at the statement in the application at Section 23, Aspects and Impacts, Table 1 it notes: "A significant amount of material could be washed away to waterways, particularly the Mataura River located near the Mataura site'. Feels that this could have serious consequences for the river and associated coastal waterways if this happened.
- Mitigation Measures, Spillage and Flooding – States that part of this section are wrong – there is for example no stream named 'Waikawa Stream' in the vicinity. Possibly referring the Waikana Stream – but feels that the mistake reflects badly on the veracity of the application.
- Mitigation Measures, other water contact – the application acknowledges that the Aluminium Oxide will naturally absorb water from the air and that this is particularly pronounced in humid conditions, resulting in an offensive odour and health effects.
- Picks up on a statement in the application that all internal pipes will be re-routed – which

suggests that this has not already been done – therefore there is additional danger from water ingress which has not been mitigated.

- The assumption in the application that the environmental effects will be minor cannot be confirmed in the absence of a building report and final risk assessments.

**Ernest Reginald Hanke**

9 Oakland Street  
Mataura

Oppose

Does not wish to be heard

*Original submission page 59*

**Submission summary:**

- States that Ouvea Pre-mix is dangerous and that when wet releases ammonia.
- States that due to gravel build up in the river the possibility of flooding is very real and would be dangerous.
- States that the building is old and full of asbestos.
- States that there are gaps in the application which they have not been able to question the applicant about.
- Raises the issue of a bond of some kind being required.
- Requests a detailed risk management plan to cover fire, flood, leaky building, and that this should include regular inspections.
- A detailed plan for removal over the two year period should also be required.

**Basil John Turnbull**

9 Scott Street  
Mataura

Oppose

Does not wish to be heard

*Original submission page 21*

**Submission summary:**

- States that an Environment Court Judge has identified that the product is toxic to human health if wet and that two men were hospitalised following exposure at Edendale.
- States that company should not be trusted – as they state in the application the building has been waterproofed and is secure – says that works are on-going and that product can be seen through broken windows.
- States that recently product has been seen to be taken away from the site due to being wet and giving off fumes.
- States – it is a disaster waiting to happen and will affect everything from Mataura to Fortrose.
- The product contains aluminium as well as fluoride (which sterilises soil).
- States there is no risk management plan and the local authority should not be left to deal with the disaster if it happens, which could result in the whole town needing to be evacuated.
- Requests a decline and removal of material before winter with the building totally cleared of product.
- IN the event that consent is granted seeks the imposition of a ‘substantial’ bond. Also final removal date needs to be established.

**John Gordon Mantell**  
7 Hillcrest Avenue  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 84*

**Submission summary:**

- Concerned about the location and condition of the site – health and safety, effects on the environment, lack of knowledge and future floods and river bed issues.
- States that he worked at the paper mill for 20 years and witnessed flood water rising through cracks and joins in the floor. Also remembers issues with drains blocking and downpipes overflowing. On this basis is concerned over whether enough prevention work has been done.
- Concerned for the community in the event of a disaster due to flood or fire.
- Has lived above the site for 12 years and states that the river course has not been stable over that period and it has changed. On this basis is concerned that little has been outlined by way of future possibilities.
- If granted wants to see firm dates for removal; regular inspections of the building and improvements with the community in mind; imposition of a substantial bond; establishment of an alarm system for toxic leaks and assurance that there is adequate liability insurance in place.
- States that a community evacuation plan should be considered as a condition of any consent granted.

**Wayne James McGowan**  
15 Doctors Road  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 224*

**Submission summary:**

- Opposes the length of time sought by the applicant.
- Doesn't want the hazardous substances in the town, states that product moved in very quickly and that the applicant should have aware of community opposition.
- Seeking to have the product removed immediately, not over 24 months.

**Lynette June Sharp**  
Trustee of Norton Trust  
75 Norton Street  
Gore

Oppose

Does not wish to be heard  
*Original submission page 156*

**Submission summary:**

- Main concerns are – danger to river; possible deterioration of production; and issues around any clean-up.
- States that in the event of a fire that the premix would not burn, however, the plastic bags would and water would sweep loose pre-mix into the river with consequences.
- Is concerned about ammonia release over time and the effects of this on human health of neighbours.
- Is concerned that NZ's clean and green image could be affected irreversibly. States that the aluminium level in soil from using the product will tie up other important nutrients and in dry condition will result in root shrinkage causing die off. – Attached journal articles to that end.
- Is concerned that if the company folds that the Council will be left with a problem and a mess to clean up.

- Is also concerned about the co-location with the meat plant and possible adverse effects on that operation.
- Concludes by stating that the building is unstable and vulnerable to flooding and the effects on a top class river.
- Appends articles on 'Soil Acidity and Aluminium Toxicity'. (these are not summarised – but are available for the commissioners, other submitters and the public generally once the recommending report is released).

**Kerry Anne Matahiki**  
32 Bangor Street  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 96*

**Submission summary:**

- Concerned about proximity of residential development and the river, the kohanga reo, and the state highway.
- Health and safety certification – has been unable to determine exactly what the relevant regulations are and how these are published to the public. Has tried getting this information from ES, PHS, and GDC.
- Seeks further assurances re the fire risk of the product and clear statements of mitigation of these risks. States that the consent should not be issued in the absence of this information.
- States the retrospective nature of the consent demonstrates a lack of credibility of the company with the community. States that on this basis that the company cannot be trusted to comply with conditions.
- Questions who has ultimate responsibility in the event of a flood for clean-up and what assurances can be made that are legally binding.
- Asks what evacuation plans are in place for the site in case of a high level emergency? How will site be secured? How will community health be protected? How will the river be protected – including all the way down to the sea?
- Wishes it to be known that 'this product is a high risk to the customary rights of local iwi under the Treaty of Waitangi, and that this area is the Mataura Te Awa Mataitai, NZ's first freshwater reserve, opened in October 2006'.
- States that the 'Mataitai is to protect and preserve with our duty to be sure we contribute to hand a pristine and fabulous natural resource to our generations to come – including the ability to hunt and gather healthy supplies of kanakana, trout, salmon, whitebait, recreational usage etc.

**Carolyn Isobel Phillips and Gary Phillips**  
8 Argyle Street  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 23*

**Submission summary:**

- Strongly opposes storage of the class 6 hazardous substance on former Carter Holt Harvey site.
- Is concerned about their health if the substance gets wet as it is toxic.
- Is concerned for leaking into the waterways and effects on fish.



**James William Waddell**  
7 Doctors Road  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 79*

**Submission summary:**

- States that NZAS has been very silent since the application became news and would have expected assurances from this company.
- Says that the industrial rating of the building reflects its history and not the current situation.
- Refers to an upcoming legal case being bought by ES in which two workers at Edendale were affected.
- Is concerned about the premix containing ammonia and releasing this when wet and the possible effects on health of neighbours. Refers to the storage in double lined bags but is concerned about damage during transit and states that the meat plant at Lornville has been evacuated twice in the past three months due to ammonia leaks.
- NZAS should offer Taha land at their site to build a purpose built plant, alternatively Taha should purchase land for the purpose away from houses.
- Refers to public meeting at which it 'was admitted that the product should not have been stored there and where a commitment was made to remove the product within two weeks'. Notes that the manager in question no longer works for Taha.
- Calculates that it will take 166 truckloads to remove the product from the site, and states that there were no signs on the building advising of the storage of a hazardous substance at the time of the public meeting but that this has now been remedied.
- Refers to a profit motive by the companies concerned over environmental considerations and feels that these companies are not concerned about a good public image.
- Concludes by stating that he hopes that a scenario like Bohpal in India does not happen.

**Newton and Winifred Wills**  
Trustee Canaan Trust NZ No 2 Inc  
9 Culling Terrace  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 172*

**Submission summary:**

- Consider that one year is long enough for the consent as they are opposed to storage in this building due to flood issues and potential destruction of river vegetation, fish etc.
- States that they live on the hill above and any fumes would come up to them and potentially affect their health and that of others.
- State that they have already had to close their windows at night to avoid 'choking' fumes.

**Howeth James Johnstone**  
164 Kana Street  
Mataura

Oppose

Does not wish to be heard  
*Original submission page 71*

**Submission summary:**

- States that he does not support the storage of material in Matauara.
- Seeks to have a bond put in place and suggests a sum of \$100,000,000 be held in trust.
- Seeks to see the product removed as soon as possible via an agreed plan.
- States that Taha must have public liability insurance put in place to insure against fire, flood risks.
- Inspections must be undertaken if consent is granted.

**Anah Kaufusi**  
171 Kana Street  
Mataura

Oppose

Did not specify  
*Original submission page 15*

**Submission summary:**

- Does not support storage at this site.
- Lives along Kana Street and near Kohanga Reo which is close to site.
- States that there are too many risks to our children and the community if stored where it currently is.
- Wants application declined and removal immediately of product immediately.

**Rawiri Bluu Edwards**  
15 Stuart Street  
Mataura

Oppose

Did not specify  
*Original submission page 183*

**Submission summary:**

- Does not support Taha due earthquake risk, flooding, leakages and asbestos.
- Asks who is responsible for residue and general emissions.
- Seeks to have the application declined and the product removed – and ensure meanwhile that Taha have public liability insurance in place.

**James Arthur Richardson**  
Main Street  
Mataura

Oppose

Did not specify  
*Original submission page 77*

**Submission summary:**

- Does not support Taha due earthquake risk, flooding, leakages and asbestos.
- Asks who is responsible for residue and general emissions.
- Seeks to have the application declined and the product removed – and ensure meanwhile that Taha have public liability insurance in place.

**Sharon Elspeth Argyle**  
Main Street  
Mataura

Oppose

Did not specify  
*Original submission page 200*

**Submission summary:**

- States: absolutely opposed to consent being granted due to earthquake risk, and flood prone nature of site.
- Is concerned about toxicity and effect on human health and also the fishery.
- States that people are already having health issues from fumes in damp weather.
- States that site is too close to residential buildings, a pre-school and the freezing works.
- States that the company cannot be trusted and seeks to have consent declined.
- In the event that consent is granted – seeks to have a bond put in place to cover cost of removal in the event that the company fails to do this.

**Darren Rerekohu Matahiki**

*(This is a private submission, but uses a Fonterra email address)*

18 Culling Terrace  
Mataura

Oppose

Did not specify

*Original submission page 32***Submission summary:**

- Raises concerns over age of building, valid and up to date building WOF and proof of 'responsive landlord responsibilities'.
- Is concerned about the 'dangerous nature of the hazardous substance being stored in an insecure building site through disrepair and lack of security to ensure that no public can access this dangerous product'.
- Is concerned about proximity to residential homes, the kohanga reo, the river and its banks. States that the river is a source of food, recreational and tourist opportunities for the Mataura community right down to the sea, the coast and sea beds.
- States that no public liability insurance is held by the company which means there is uncertainty over who would clean up in the event of a disaster and support the community and whanau.
- Is concerned about the credibility of the company.
- Requests the following in the event of consent being granted: Liability insurance from a local company, preemies cleared and the fully inspected by a building inspector, payment of a bond of no less than \$5 million to be held by the appropriate environmental agency to safeguard the environment.

**Noel James Walker**

1 McKelvie Heights  
Mataura

Oppose

Did not specify

*Original submission page 176***Submission summary:**

- Application is opposed for the following reasons:
- Health risk to the community, or town.
- The courts have established this product is hazardous and an eco-toxin.
- The building is inadequate – damaged windows, broken pipes.
- High earthquake risk.
- Highly dangerous to Alliance if it gets into water ways.
- The Fire Service is ill equipped to handle any fire as no water can be used.
- Seek to see consent declined with immediate removal of product.

**Archibald David Edwards**

15 Stuart Street  
Mataura

Oppose

Did not specify

*Original submission page 19***Submission summary:**

- Does not support the company for the following reasons:
- Earthquake risk, flooding, leakage by rainfall, asbestos.
- Who is responsible for any residue and general emissions.
- Building has passed its use by date.
- Seeks a decline of consent and removal of product and that Taha put in place public liability insurance and high risk management plans.

**Lorraine Elizabeth Webster**  
198 Kana Street  
Mataura

Oppose

Did not specify  
*Original submission page 154*

**Submission summary:**

- Does not support the company for the following reasons:
- Earthquake risk, flooding, leakage by rainfall, asbestos.
- Who is responsible for any residue and general emissions.
- Building has passed its use by date.
- Seeks a decline of consent and removal of product and that Taha put in place public liability insurance and high risk management plans.

**Katrina McRae**  
11 Culling Terrace  
Mataura

Oppose

Did not specify  
*Original submission page 94*

**Submission summary:**

- Application is opposed for the following reasons:
- Health risk to the community, or town.
- The courts have established this product is hazardous and an eco-toxin.
- The building is inadequate – damaged windows, broken pipes.
- High earthquake risk.
- Highly dangerous to Alliance if it gets into water ways.
- The Fire Service is ill equipped to handle any fire as no water can be used.
- Seek to see consent declined with immediate removal of product.

**Jackson Tohi Rarere**  
35 Burns Street  
Mataura

Oppose

Did not specify  
*Original submission page 75*

**Submission summary:**

- Does not support Taha.
- Want to see fertiliser removed as soon as possible.

**Amelia Callelerd Rarere**  
35 Burns Street  
Mataura

Oppose

Did not specify  
*Original submission page 13*

**Submission summary:**

- Does not support Taha.
- The Kohanga Reo is located at 106-108 Kana Street.
- There is a high risk and the chemicals are toxic if released into environment.
- Would like to see this chemical removed.

**Vanessa Whangapirita Edwards**  
PO Box 55  
Mataura

Oppose

Did not specify  
*Original submission page 218*

**Submission summary:**

- States that the site is too close to the river and that the Waikana Stream flows under the building.
- The start and end dates for the storage are not clear in the application and questions the timeframe in relation to having an operational plant to remove product to.
- States that the building is old and poorly maintained and not suitable for this level of storage of hazardous substance. A full assessment of the suitability of the building should be provided as part of the application – storage should be in a sealed environment. Questions how the Council can assess the suitability of the building if its full – and suggests that a full assessment would require the removal of the product first.
- States that there can be no guarantee that water will not enter buildings that are not purpose built – and is concerned that Taha have stated that they have no public liability insurance – suggests that liability in the vicinity of \$60 million is required.
- Expresses concern at the ability of the company to put in place the flood measures as no staff live in Mataura and staff would have to travel from Invercargill. Discusses general concerns and scenarios around this point.
- Raises the undertakings given by Eggerton at a January 2015 meeting and that the company has not followed through. There has been no follow up meeting as promised.
- States that there needs to be a bond put in place if Taha is granted consent and needs to be of sufficient size to address the full scale of the operation. Suggests a figure of \$5 million, to be held only to be spent in Mataura if Taha walked away or left any product in the buildings – suggests that any money left over should be forfeited to the Mataura community.
- If consent is granted – a full building inspection should be carried out every months with a representative of Taha, a Gore District Council building inspector, Mataura elected representative and a representative of the wider Mataura community, as nominated by the Matuara Action Group – any costs incurred to be met by Taha.
- States that the Mataura River is part of an internationally recognised trout fishery and this needs to be borne in mind in granting of this consent. In addition the area is covered by the 2005 Maitai reserve and the crown has acknowledged in its treaty settlement the significance for Ngai Tahu of the river and its status in the Deed of Recognition.
- States that the Environment Court in a 2014 decision stated that (Ouvea pre-mix) is dangerous to human health and is an eco-toxin.
- States that the application is contrary to Part II of the RMA.

**Christopher Stanley Couzens  
And Linda Jane Couzens**  
1 Hillcrest Avenue  
Mataura

Oppose

Did not specify  
*Original submission page 25*

**Submission summary:**

- Includes a medical certificate which questions a 'possible' connection between the recent increase in throat and eye irritations to recent chemical exposure due to recent increasing storage of chemical product in close proximity to his property.
- Raises issues of Council responsibility in handling the situation overall. Makes a string of statements about the building owner, the applicant and the Council and calls for an investigation into the matter.

Please Note: The full submission is included in the appendices to this report.

**Robin Matthew McGowan**  
209 Crawford Street  
Gore

Oppose

Wishes to be heard  
*Original submission page 192*

**Submission summary:**

- States that the building is in poor repair, is in proximity to the Mataura River (which has a conservation order) and in proximity to the Waikana Stream, and adjacent to residential properties, and the Kohanga Reo.
- Is concerned that there is no water supply for fire fighting and no fence.
- Requests the following if consent is granted:
- Removal of product only and no more to come to the site.
- Limited to two years only and not two years from after processing plant built.
- No right of renewal.
- Consent should be in the name of the building owner as well.
- A bond sufficient to clean up the site and transport 10,000t to a landfill.
- GDC advise that no further retrospective consents be granted for this site.
- Requests an independent commissioner hear the application.

**Leora Edwards**  
15 Stuart Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 101*

**Submission summary:**

- Does not support application due to earthquake risk, flooding, leakage created by rainfall, asbestos.
- Questions who is responsible for residue and general emissions.
- States that the building is past its use by date.
- Requests a decline with immediate removal – and that Taha take public liability insurance and produce a risk management plan.

**Peter Endres**  
45 Kana Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 181*

**Submission summary:**

- Does not support the application for the following reasons:
- The building has flooded in the past due to non-extraction of gravel above the falls. Expresses concern that a future flood could wash contaminants into the river killing fish. States that this is short term economic solution prevailing over a long term resource.
- Building is 100 years old so at risk of rainwater leaking in and earthquake damage.
- Seeks substantial public liability insurance and a minimum bond of \$50 million to clean site if needed.
- The site needs regular inspections.
- States that Taha should be prosecuted for 'illegal' storage.
- States that Taha should remove material immediately as promised in January 2015.

**Shirley Simpson**  
123 123 Kana Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 202*

**Submission summary:**

- Believes that family has been suffering from eye irritation, skin irritation, breathing problems and diarrhoea.
- Believes that the 'fertiliser' is a time bomb that could wipe out town and residents.
- States that they should have been consulted and feels let down by the council.
- Wants the 'fertiliser' taken away from district.

**Graeme Fergusson Simpson**  
123 Kana Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 68*

**Submission summary:**

- States opposition and that Taha can't be trusted.
- Questions application which states that trees between mill and houses.
- States that has suffered respiratory problems, eye problems, diarrhoea, skin irritation.
- States that building is leaky and that product can be seen, that no one informed them about the storage and side effects. States that a lot of smells occur at night – that the property owner is 2 hours away even though they have cell phone details.
- States that they have left house at night due to smells.
- States that is not happy with the performance of the Council. Also refers to a problem with drainage under the road that is broken.
- States that they have had fish die in their ponds and that they have found dead birds and witnessed birds falling out of the sky.
- Indicates that they are possibly taking commencing legal action and are about to take advice.

**Alliance Group**  
C/- Mitchell Partnerships  
PO Box 489  
Dunedin

Oppose

Wishes to be heard  
*Original submission page 8*

**Submission summary:**

- Provides background on the company history and scale of their operation.
- The Mataura plant relies on a water take from the river for day to day operations, therefore imperative that water is of a high standard and in the event of not being able to take this water the plant may have to cease operations until water quality is returned; the costs of which will be significant.
- Alliance expresses its concern about the potential health and safety impacts that could result.
- Alliance raise the issue of a lack of gravel extraction upstream and the potential consequence of this and refers to changing river dynamic in this receiving environment and that given this dynamic river modelling may not be accurate and difficult to predict.
- Expresses concern at possible dust emissions which contain aluminium nitride which could deposit in the Waikana Stream or the Mataura River. On this basis they submit that the product should be stored in purpose built structures that can be fully sealed to prevent water entering and to prevent emissions escaping. Alternatively the application should thoroughly

- assess the buildings capacity.
- Alliance raises concerns about the transportation to and from the site and the handling of the material. Alliance submits that there risks here are too great and resulting effects could be significant. In addition the application does not propose any conditions in this regard and consider this to be an oversight.
  - Request a bond such that the material can be removed (section 108(2)(b) of the RMA).
  - Alliance considers that the application is incomplete under section 88 – and lacks an environmental risk assessment – and the Council has erred in accepting the application.
  - Alliance is seeking certainty around the time frame – however they submit that the activity should not be allowed in this location. Alternatively the conditions of any consent should timetable the removal such that a better location is found with a 6 month horizon.
  - Alliance submits that the application is contrary to Part II of the Act, in particular Section 5 in that it does not promote the sustainable management of natural and physical resources;
  - The site is not a specially designed storage facility for hazardous substances.
  - The proximity of the Mataura River and Waikana Stream has the potential to result in significant adverse environmental effects, particularly in the event of any flooding at the site, or spillage or mishandling of the hazardous substances.
  - There are risks on its staff and plant operations which have not been properly quantified if the hazardous substance is released into the water or air.
  - There is no certainty that the material will be removed from the site within the two year timeframe noted in the consent and Alliance seeks.

**Terri McCurdy**  
43 Second Street  
Invercargill

Oppose

Wishes to be heard  
*Original submission page 215*

**Submission summary:**

- States that the substance is significantly hazardous to human health in its dry form and even more toxic when damp or wet and is not suitable to be stored next to a residential area.
- Submits that the area proposed is at risk of flooding even with the measures proposed as a significant flood will still affect the area, and with the volume of product the movement or protection by sandbagging does not seem feasible.
- Submits that the consequences of the substance entering waterways are severe and long lasting putting the entire lower Mataura river and potentially the southern coastline including Stewart Island at risk due to eco-toxic effects.
- Submits that they are not convinced by motivation of company if things go wrong and submits that she doubts any farmer would use the product given the presence of aluminium and fluoride.

**Roslyn Jackie Glenn**  
24 Riverhead Lane  
Mataura

Oppose

Wishes to be heard  
*Original submission page 194*

**Submission summary:**

- Submits that the stored product can be seen and can be accessed by the public.
- Submits that there are broken pipes beneath the factory and broken windows.
- Submits that the building is an earthquake risk, and at flood risk due gravel builds up in the river increasing flood risk in the building.
- Submits that the local fire service is ill-equipped to handle a fire within the building.



- Submits that the stored product has been subject of moisture damage and that product has been removed for this reason.
- Submits that the company is unable to keep the public safe.
- Seek a decline to the consent and instant removal in conjunction with a liability clause of not less than \$10 million.

**Ian John Soper**  
166 Kana Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 73*

**Submission summary:**

- Seeks the removal of fertiliser and refusal of consent in conjunction with a \$5 million bond.
- Flags risk management – earthquake, a build-up of gravel in the river bed, and an old roof on the former paper mill, and fire risk due to building being 100 years old.
- Seeks that Taha have public liability insurance and a firm date for removal.
- Submits that WOF for building be completed and that regular ‘public’ inspections be undertaken.

**Lisia Ann Barron**  
20 Culling Terrace  
Mataura

Oppose

Wishes to be heard  
*Original submission page 103*

**Submission summary:**

- Submits that Taha have ‘illegally’ deposited 10 million kilos of Class 6 and Class 9 material.
- Has researched chemical issues and attached information including data sheets – and submits that issues and hazards have been understated by the applicants.
- Submits that the buildings cannot be properly evaluated for structural soundness or water tightness in the event of earthquake, fire fold or vandalism when occupied.
- States that inconsistencies as per attached documents call into question the accuracy and integrity of Taha Fertiliser Industries as there is a ‘major’ discrepancy in the composition of Ouvea pre-mix. Storage sites and amounts are inaccurate.
- States that the Environment Court of NZ, Judge JE Borthwick, has ruled that Ouve Pre-mix is ‘dangerous to human health and is an eco-toxicant’ and that Taha have failed to state their level and kind of liability insurance held.
- Seek to have the application declined and all chemicals removed immediately – and that a bond should be imposed to cover all risks to people, the environment, people and property.
- Provides her analysis of the chemical on site calling into question accuracy in the application stating the amounts quoted in the withdrawn application are correct and that these are not correct in the subsequent and current application. She questions - who has verified which materials are present and their amounts.
- States that the lives and long term health of our fire fighters and first responders should also be taken into account and cites that the MSD sheets for the materials listed require stringent protection – i.e., self-contained breathing apparatus in addition to suitable protective clothing.
- States that – it is possible, given the quantities involved, that there could be a catastrophic loss of life in the Mataura River, possibly all the way to Stewart Island and beyond were all the material to find its way into the river by a natural or man-made event.
- States that the product should not be stored on the banks of any river or in a town. Concluding points are:

- The substances have been illegally stored; they are
- A hazard to local residents health in the event of a disaster, manmade or natural; they are
- A hazard to local fire fighters and first responders in the event of: A flood, a burst water pipe, a fire, an earthquake – and a disastrous bio-threat to the Mataura River and Foveaux Strait.
- States that the material is stored ‘illegally’ and should be removed immediately and that a bond should be imposed.

Please note: this is a very detailed submission accompanied by a large amount of technical information, and Environment Court decision. The full submission is in the appendices to this report.

**Southern District Health Board**  
**Public Health South**  
 PO Box 1601  
 Invercargill

Oppose

Wishes to be heard  
*Original submission page 209*

**Submission summary:**

- States that the application contains inadequate information and does not satisfactorily address key issues with respect to potential emissions to air or risk to public health.
- Submits that in their opinion: there is a public health risk associated with the Ouvea premix and to a lesser extent, ammonium sulphate. The key public health concerns are: exposure to Ouvea pre-mix dust; storage of Ouvea pre-mix is not on air tight bags; bags of Ouvea pre-mix are not water proof; inadequate site and incident management; close proximity of additional sensitive receptors to the storage site and storage of ammonium sulphate in unsuitable receptacles.
- Submits that: The mitigation measures contained in the Environmental Management Plan (EMP) do not alleviate concerns around exposure to dust emissions as the storage of Ouvea pre-mix is not in airtight containers. Given that the site is in a high humidity location i.e., next to the Mataura River and over the Waikana Stream, in our opinion, this poses a very real potential health risk to workers on site/immediate neighbours and is a potential odour risk to neighbours further away.
- States that: The reaction that produces ammonia gas has the potential to create hydrogen gas in a secondary reaction with aluminium. Hydrogen is highly combustible and may pose a potential explosion risk. The means of ventilation, or ventilation rates, are not clearly stated in this application. If the applicant is to employ passive air ventilation, there may be insufficient ventilation to effectively disperse generated hydrogen gas.
- Submit that the storage facilities appear to be in poor condition and the integrity of the roof to prevent ingress of rain water remain uncertain – in addition the Assessment of Environmental Effects contains no details on fire protection, nor is a building report currently available.
- Submits that: the environmental management plan places full responsibility for transport of the Ouvea pre-mix onto transport companies. It is unclear as to any requirement for trucks to cover Ouvea pre-mix during transport, loading or handling.
- Submits that the incident procedure for odour complaints outlined in the EMP is not in accordance with the process outline in table 4.1 of the Ministry for the Environment Odour Guide, and the proposal is unclear as to exactly where and in what quantities to pre-mix will be stored in stores A, B, C and D. IN addition the AEE does not identify potential receptors in the community including residential properties and a Kohanga Reo approximately 100m to the South West.
- Outlines the statutory role of the DHB and Public Health South and seeks the following be addressed in order to effectively mitigate the public health risk:

- That the building is fit for purpose and provides adequate prevention for ingress of water.
- That the applicant has investigated alternative options for the receptacles of Ouvea pre-mix that minimise the risk of it coming into contact with water and humid air.
- That there is contingency in place in the event of fire in the proposed building. This must include potential for discharges to air.
- Additional detail on material handling and storage protocols including how the bags of pre-mix would be safely unloaded into the storage facility is provided.
- Additional detail on the management of projected fugitive emissions including ammonia should the pre-mix get damp.
- A contingency plan covering all possible scenarios in the event of water coming into contact with the Ouvea pre-mix.
- Additional detail regarding standards and methods of monitoring for odour, dust and noise.
- A review of the incident procedure following an odour complaint as per Ministry for the Environment Good Practice Guide for assessing and Managing Odour in NZ.

**Wyndham Angling Club (Inc)**

C/- AJ Leith  
2 Pera Street  
Wyndham

Oppose

Wishes to be heard

*Original submission page 226*

**Submission summary:**

- Submit that the Angling Club totally opposes the application for any term which they contend is being stored illegally. They state that the application is incomplete in their view and that the application submitted contains conflicting details over the dangers to the river.
- Submit that the applicant be compelled to immediately remove the pre-mix – ‘described by the Environment Court as dangerous to human life and is an Eco toxicant’.
- State that the Angling Club is ‘staggered’ by the quantities involved and the intent to store these ‘dangerous materials on the banks of the Mataura River In the middle of a housing area and across the river from a food factory’.
- Question the amounts actually stored on the site.
- Provides an analysis of chemical componentry and a comment on potential environmental devastation as they see it.
- Refer to the Environment Court ruling of 2014 in which Judge Borthwick is quoted as saying – ‘I am satisfied that the material (Ouvea Pre-mix) is dangerous to human health and is an eco-toxicant.
- Submit that any manufacturing of this product should be near a town or river or flood prone area.
- Submit that the material is a hazard to local residents, a hazard local fire fighters, pose a flood risk, hazardous if a pipe breaks, there is a fire or earthquake, potentially bio-threat to river and Foveaux Strait.
- Pose a question over the time frame as there is no known new site, and from which date is the two years taken. Raise a concern over the wording for triggering of removal of the product.
- Raise a concern over the quantity of material stored and seek clarification around base lining this.
- State that the application is incomplete and the flood modelling will be too late for submitters to comment on and they submit that every flood that comes down the river is different and the flood banks have been breached previously. They have ‘deep’ concerns about the proposed flood protection measures.
- Seek to have no consent granted and that the present tonnage be removed as swiftly as possible.

**Mataura Angling Club**  
C/- David John Van Tangeren  
2 Ingram Place  
Mataura

Oppose

Wishes to be heard  
*Original submission page 39*

**Submission summary:**

- Raise the following specific points:
- Earthquake risk – 100 year old building.
- Flood risk – a lot higher than made out by applicant – water race is full of gravel – where does water go in a flood.
- Changing topography of the riverbed above mill due to lack of maintenance.
- Leakage into the building from rainfall – 100 year old building.
- General emissions should the product gets wet are a health risk.
- Who is responsible for any clean up or left over product if the company fails?
- Submits that there are a number of reports missing from the application: these are
- On potential health risks.
- Questions of public liability.
- An adequate building report.
- A report on potential leaching into river.
- Storage of product in a floodway.
- Fire fighting procedures and use of water.
- Submit that is difficult make informed submissions without this information.
- Seeks to have the consent declined.
- Seeks court action over illegal storage.
- Seeks immediate removal of pre-mix.

**Environment Southland**  
Private Bag 90116  
Invercargill

Oppose

Wishes to be heard  
*Original submission page 50*

**Submission summary:**

- Environment Southland (ES) are a statutory authority and affected party who have chosen to submit on the application on the following matters: Hazards mitigation, Catchment, land and Water, Bio-security, and pollution prevention. They have a wide remit and a large and substantial submission the main points of which cover: Pending reports from the applicant, floodplain issues, detailed flood history, flood alleviation works, on site flood mitigation, flood risk, plastic lined bags, monitoring the flood forecast, health and safety risk.
- Pending reports: Flood history – Taha have engaged flood modellers to further assess the likelihood of buildings flooding in extreme events. This information is not yet to hand.
- Building suitability – a final building report will be developed as part of the risk assessment and submitted once complete. This information is not yet to hand.
- Taha has engaged a suitably qualified environmental professional to conduct an environmental risk assessment to confirm this assessment. This information is not yet to hand.
- ES states that – ‘Until such time as ES has had the opportunity to consider the further information to be supplied by the applicant – ES opposes this application.
- Summary point – This site is subject to actual or potential inundation from a number of sources but mainly the Mataura River and the Waikana Stream.

- Summary point – The site is protected from inundation from floods up to the size of the highest past floods on the Mataura River and Waikana Stream.
- Summary point – The Ouvea Pre-mix that is stored in the building reacts with water to produce ammonia gas and heat.
- Summary point – The plastic lined bags may protect the Ouvea pre-mix from getting wet in the event of the storage area being flooded but there is some uncertainty about that.
- ES provides a very detailed history of flood plain issues and events and displays a detailed knowledge of the site, its buildings and associated issues. This is based on the long history of occupation and industrial activity on the site.
- State that the buildings within which the storage will occur are old and have not received a lot of maintenance over the last 15 years. This includes roofs, gutters, downpipes – there is more potential for leaks.
- The paper mill had high water demands and there are pipes and channelled connections with the Mataura River and the Waikana Stream. Proposed store A – is located at the foot of a high steep terrace along the bottom of which runs a shallow drain which is more or less at floor level making this building susceptible to flooding if the drain is not kept clear or if it over loads during a rain event.
- Extensive evidence and commentary on the flood history is provided. The largest recorded flood was in October 1978. The depth of flooding was in the order of 5-6 feet deep in parts of the mill. The return period is considered to be 50-60 years with an approximate 2% chance of a flood of this size in any one year.
- A range of flood mitigation measures have been put in place since the 1978 flood many of the changes were based on modelling work undertaken by ES. The main floods in recent times were in 1968, 1978, 1980, 1987, and 1999.
- In the early 1980's the paper mill constructed then raised a steel reinforced concrete wall between the mill and the river at the northern and southern ends of the site as the primary means of protecting the site from flooding. The top of the wall is 600mm above the 1978 flood level. ES note that the end of the wall at the north end of the mill is at least as high (and maybe higher) as the adjoining flood bank.
- In the early 1980's the mill constructed many steel shutters and some concrete slab panels to place over various openings in or between the mill buildings. These were erected in the 1987 and 1999 floods. Anecdotal evidence suggests that the flood protection measure protected the mill during these two floods. ES supports the continued use of these shutters and some permanently. ES note that the replacement sand bag may not keep the water out completely. The use of pellets in store A is noted but ES feel that the information in the application is vague.
- Storage in the bags proposed is noted but the openings at the top, however vertical stacking will reduce risk of water entering the bags. ES raises a concern over just how water proof the bags are and suggest a flood testing of the bags loaded with the product to confirm their performance.
- State that flood risk is a compound measure and in this case the risks arise from flooding from four sources being: the Mataura River, The Waikana Stream, stormwater, and roof water.
- ES outline the likely chemical reaction with water with the resultant production of ammonia gas and heat and they detail how much is produced per ton and they state that this evaluation underpins their concern about the potential risks. In addition they state that the Ouvea pre-mix is an eco-toxicant and would result in harm if released into any river or water way.
- Flood alleviation measures – stated in the application as the use of individual bags and the monitoring of flood forecasts. Their concerns with the bags are outlined above. In relation to the flood monitoring forecast – this involves a system of trigger points which need

development including – forecast rainfall and or river level at Parawea, a site upstream of Mataura. While there would be several hours of potential lead time, some or most of that could be at night when no one is on site.

- ES raise a technical question over the science around water exposure of the product and asks if Taha has evidence to confirm what the reaction rate is if the material is exposed to an excess of water (as in a flood) followed by a long period of dampness.
- Health and safety risk – ES state that Ammonia gas is a serious health and safety risk to personnel in and around the building. Ammonia gas detectors and alarms should be installed, and evacuation procedures established.

**Robert Brian Meikle**  
22 Selbourne Street  
Gore

Oppose

Wishes to be heard  
*Original submission page 187*

**Submission summary:**

- Seeks the right under s92 to review the environmental risk assessment referred to in the application but not supplied prior to the hearing. This includes any other material not already supplied by Taha.
- States that the site is too close to the Mataura River and Waikana Stream and that should flooding occur, there is a significant risk to the rivers and the southland coast – as well as a risk to Mataura residents from vapour. Notes that the site is located in a flood hazard area.
- States that the two year dates are unclear and that this is based in part on Taha securing a site for a processing factory and asks if all of this will be within the two year time frames.
- States that the building are poorly maintained and not purpose built and therefore not considered suitable for the proposed storage.
- States that the material should be stored in a purpose built storage and that it is not possible to fully assess the suitability of the building if its already full.
- States that there can be no guarantee that water will not enter the building as not purpose built. States concern that Taha have no public liability insurance and suggests a figure of \$60 million as a minimum to mitigate any effects of water entering buildings and contaminating the Ouvea pre-mix.
- Is concerned that the implementation of flood risk measures is reliant on Taha staff who live in Invercargill and also raises the question of adequate staffing if the Kennington site also need to have flood measure put in place at the same time – or in the night.
- States that they are concerned over the management turnover in Taha and the ability of the company to be reliable under these circumstances in relation to flood protection measures.
- States concern over performance of company and commitments given at public meetings in the town.
- Seeks a bond of \$5 million for any clean up and removal in the event the company fails.
- Seeks a condition of consent – if granted – be regular 2 monthly monitoring inspection of the building by a team comprising – Gore District Council Building Inspector, Mataura elected councillor and a representative of the wider Mataura community as nominated by the Mataura Action Group – with any costs to be met by Taha.
- The ‘internationally recognised’ trout fishery and 2005 Mataitai should be a consideration and the basis for a refusal of consent – and states that the crown has formally acknowledged the association and values which the river holds for Ngai Tahu whanau by giving effect to the status of Deed of Recognition as set out in Ngai Tahu Claim Settlement Act 1998.
- Quotes from and Environment Court judgement – August 2014: Southland Regional Council V Taha Asia Pacific – Judge Borthwick – ‘I am satisfied that the material (Ouvea Pre-mix) is dangerous to human health and is an eco-toxicant.
- States that the application is contrary to Part II of the RMA 1991 and should be declined.

**Colin Hamilton Meikle**  
51 Oakland Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 29*

**Submission summary:**

- Seeks the right under s92 to review the environmental risk assessment referred to in the application but not supplied prior to the hearing. This includes any other material not already supplied by Taha.
- States that the site is too close to the Mataura River and Waikana Stream and that should flooding occur, there is a significant risk to the rivers and the southland coast – as well as a risk to Mataura residents from vapour. Notes that the site is located in a flood hazard area.
- States that the two year dates are unclear and that this is based in part on Taha securing a site for a processing factory and asks if all of this will be within the two year time frames.
- States that the buildings are poorly maintained and not purpose built and therefore not considered suitable for the proposed storage.
- States that the material should be stored in a purpose built storage and that it is not possible to fully assess the suitability of the building if its already full.
- States that there can be no guarantee that water will not enter the building as not purpose built. States concern that Taha have no public liability insurance and suggests a figure of \$60 million as a minimum to mitigate any effects of water entering buildings and contaminating the Ouvea pre-mix.
- Is concerned that the implementation of flood risk measures is reliant on Taha staff who live in Invercargill and also raises the question of adequate staffing if the Kennington site also need to have flood measure put in place at the same time – or in the night.
- States that they are concerned over the management turnover in Taha and the ability of the company to be reliable under these circumstances in relation to flood protection measures.
- States concern over performance of company and commitments given at public meetings in the town.
- Seeks a bond of \$5 million for any clean up and removal in the event the company fails.
- Seeks a condition of consent – if granted – be regular 2 monthly monitoring inspection of the building by a team comprising – Gore District Council Building Inspector, Mataura elected councillor and a representative of the wider Mataura community as nominated by the Mataura Action Group – with any costs to be met by Taha.
- The ‘internationally recognised’ trout fishery and 2005 Mataitai should be a consideration and the basis for a refusal of consent – and states that the crown has formally acknowledged the association and values which the river holds for Ngai Tahu whanau by giving effect to the status of Deed of Recognition as set out in Ngai Tahu Claim Settlement Act 1998.
- Quotes from an Environment Court judgement – August 2014: Southland Regional Council v Taha Asia Pacific – Judge Borthwick – ‘I am satisfied that the material (Ouvea Pre-mix) is dangerous to human health and is an eco-toxicant’
- States that the application is contrary to Part II of the RMA 1991 and should be declined.

**Rawiri Rulon Edwards**  
PO Box 55  
Mataura

Oppose

Wishes to be heard  
*Original submission page 185*

**Submission summary:**

- Submits in opposition and cites earthquake risk, flood risk – and broken windows, building, general emissions – health risk and asbestos in building.

**John Francis Peek**  
6 Kana Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 86*

**Submission summary:**

- Submits that the site is an old building on the banks of a river with a protection order on it.
- Submits as the product turn toxic when wet – that this is unacceptable and dangerous to aquatic life and toxi fumes could be dangerous to residents of Mataura.
- Submits that the site is close to a meat export plant which is a major employer in eastern Southland and any mishap could be lethal.
- Submits that the paper mill site has a history of flooding and doesn't believe that the building can be insulated against flooding and submits that product has a chequered history.

**Daryl Francis Meikle**  
9 McKelvie Heights  
Mataura

Oppose

Wishes to be heard  
*Original submission page 34*

**Submission summary:**

- Seeks the right under s92 to review the environmental risk assessment referred to in the application but not supplied prior to the hearing. This includes any other material not already supplied by Taha.
- States that the site is too close to the Mataura River and Waikana Stream and that should flooding occur, there is a significant risk to the rivers and the southland coast – as well as a risk to Mataura residents from vapour. Notes that the site is located in a flood hazard area.
- States that the two year dates are unclear and that this is based in part on Taha securing a site for a processing factory and asks if all of this will be within the two year time frames.
- States that the building are poorly maintained and not purpose built and therefore not considered suitable for the proposed storage.
- States that the material should be stored in a purpose built storage and that it is not possible to fully assess the suitability of the building if its already full.
- States that there can be no guarantee that water will not enter the building as not purpose built. States concern that Taha have no public liability insurance and suggests a figure of \$60 million as a minimum to mitigate any effects of water entering buildings and contaminating the Ouvea pre-mix.
- Is concerned that the implementation of flood risk measures is reliant on Taha staff who live in Invercargill and also raises the question of adequate staffing if the Kennington site also need to have flood measure put in place at the same time – or in the night.
- States that they are concerned over the management turnover in Taha and the ability of the company to be reliable under these circumstances in relation to flood protection measures.
- States concern over performance of company and commitments given at public meetings in the town.
- Seeks a bond of \$5 million for any clean up and removal in the event the company fails.
- Seeks a condition of consent – if granted – be regular 2 monthly monitoring inspection of the building by a team comprising – Gore District Council Building Inspector, Mataura elected councillor and a representative of the wider Mataura community as nominated by the Mataura Action Group – with any costs to be met by Taha.
- The 'internationally recognised' trout fishery and 2005 Mataitai should be a consideration and the basis for a refusal of consent – and states that the crown has formally acknowledged the association and values which the river holds for Ngai Tahu whanau by giving effect to the status of Deed of Recognition as set out in Ngai Tahu Claim Settlement Act 1998.



- Quotes from and Environment Court judgement – August 2014: Southland Regional Council V Taha Asia Pacific – Judge Borthwick – ‘I am satisfied that the material (Ouvea Pre-mix) is dangerous to human health and is an eco-toxicant.
- States that the application is contrary to Part II of the RMA 1991 and should be declined.

**Michael Anthony Kirby**  
13 Doctors Point Road  
Mataura

Oppose

Wishes to be heard  
*Original submission page 168*

**Submission summary:**

- Questions totals stored and asked – what does less than minor mean in the executive summary as local people are already needing to go to the doctor.
- Refers to the Material Safety Data Sheets and on this basis seeks the substance is too toxic for a town area.
- Seeks that a bond be put in place in the event it is needed and that the company has public liability insurance and seeks regular ‘public’ inspections.
- Submits that there is an earthquake risk of buildings, health risks and date removal of stored material be immediate.

**Aileen Frances Meikle**  
22 Selbourne Street  
RD 2  
Gore

Oppose

Wishes to be heard  
*Original submission page 4*

**Submission summary:**

- Seeks the right under s92 to review the environmental risk assessment referred to in the application but not supplied prior to the hearing. This includes any other material not already supplied by Taha.
- States that the site is too close to the Mataura River and Waikana Stream and that should flooding occur, there is a significant risk to the rivers and the southland coast – as well as a risk to Mataura residents from vapour. Notes that the site is located in a flood hazard area.
- States that the two year dates are unclear and that this is based in part on Taha securing a site for a processing factory and asks if all of this will be within the two year time frames.
- States that the building are poorly maintained and not purpose built and therefore not considered suitable for the proposed storage.
- States that the material should be stored in a purpose built storage and that it is not possible to fully assess the suitability of the building if its already full.
- States that there can be no guarantee that water will not enter the building as not purpose built. States concern that Taha have no public liability insurance and suggests a figure of \$60 million as a minimum to mitigate any effects of water entering buildings and contaminating the Ouvea pre-mix.
- Is concerned that the implementation of flood risk measures is reliant on Taha staff who live in Invercargill and also raises the question of adequate staffing if the Kennington site also need to have flood measure put in place at the same time – or in the night.
- States that they are concerned over the management turnover in Taha and the ability of the company to be reliable under these circumstances in relation to flood protection measures.
- States concern over performance of company and commitments given at public meetings in the town.
- Seeks a bond of \$5 million for any clean up and removal in the event the company fails.

- Seeks a condition of consent – if granted – be regular 2 monthly monitoring inspection of the building by a team comprising – Gore District Council Building Inspector, Matura elected councillor and a representative of the wider Matura community as nominated by the Matura Action Group – with any costs to be met by Taha.
- The ‘internationally recognised’ trout fishery and 2005 Mataitai should be a consideration and the basis for a refusal of consent – and states that the crown has formally acknowledged the association and values which the river holds for Ngai Tahu whanau by giving effect to the status of Deed of Recognition as set out in Ngai Tahu Claim Settlement Act 1998.
- Quotes from an Environment Court judgement – August 2014: Southland Regional Council V Taha Asia Pacific – Judge Borthwick – ‘I am satisfied that the material (Ouvea Pre-mix) is dangerous to human health and is an eco-toxicant.
- States that the application is contrary to Part II of the RMA 1991 and should be declined.

**Patricia Bastiaansen**  
23 Culling Terrace  
Matura

Oppose

Wishes to be heard  
*Original submission page 178*

**Submission summary:**

- Opposes the application and states that the courts have determined that the product is hazardous to human health and is an eco-toxin.
- States that the building within which it is proposed to store the product is inadequate due to broken windows and damaged pipes underneath the building, and states further that the building is an earthquake risk and that there is a gravel build up which increases the risk of flooding
- States that the local fire brigade is ill-equipped to handle a fire within the building.
- Seeks to have the application declined and the product removed and that a bond should be put in place to cover this.
- Submits that the company must have public liability insurance to cover any incident and that the two year consent should start from the date the consent is issued.

**Laurel Turnbull**  
9 Scott Street  
Matura

Oppose

Wishes to be heard  
*Original submission page 99*

**Submission summary:**

- States total opposition to application for the following reasons:
- The building is not suitable and has been identified as an earthquake risk.
- It is subject to flooding and has been inundated on more than one occasion.
- Submits that a flood greater than the 1978 flood cannot be ruled out given extreme weather events being experienced.
- Submits - It is a material that absorbs moisture from damp air and residents in the area are already experiencing health issues from the fumes.
- Submits – it is too close to residential properties, a pre-school, who are already experiencing health issues – and a primary meat producing plant with a risk of contamination from fumes and dust being very high.
- Submits that the applicant states they have no public liability insurance or how much they do have.
- Submits that the bags can be easily pierced when being moved with a fork lift and the dust from this is already on neighbouring properties killing their goldfish.

- Seeks to have application denied and the material removed before winter and the building be totally cleared of this substance.
- Asks that if the consent is granted – for a substantial bond to be put in place in the event that Taha are not able to carry out their responsibilities to remove the product.
- Submits - There also needs to be a date by which this product is to be removed by.

**Fish and Game Southland**  
PO Box 159  
Invercargill

Oppose

Wishes to be heard  
*Original submission page 63*

**Submission summary:**

- Submits that storage of the Ouvea pre-mix on this site risks damage to the Maitara River Trout fishery which is recognised by a National Water Conservation Order.
- Submits that this nationally important resource should not be subject to the risks this proposal carries with it – although the applicant is confident the risk is low a spillage would have severe consequences.

**Fiona Kaye Walker**  
1 McKelvie Heights  
Maitara

Oppose

Wishes to be heard  
*Original submission page 61*

**Submission summary:**

- Submits in opposition for the following reasons:
- The health risk to people in this town and being 40m from a pre-school.
- The courts have found this product is hazardous and an eco-toxin.
- The building they have stored this product in is inadequate – with damaged windows and broken pipes.
- There is a high earthquake risk to the building.
- The proposal is highly dangerous to our main industry if it gets into the water ways.
- The fire brigade are ill-equipped to handle any fire as no water can be used.
- Seeks to have the application declined with immediate removal of product from site and town.

**Annette Glenn**  
24 Riverhead Lane  
Maitara

Oppose

Wishes to be heard  
*Original submission page 17*

**Submission summary:**

- Submits in opposition for the following reasons:
- Building suitability – both the condition of the building and the inability to keep a constant temperature, and that there is asbestos present, and the building is an earthquake risk – and is not weather proof. States that the bags can be seen behind broken windows and open gaps.
- Submits that doors have been left open at various times with no one around to make sure of security.
- Submits that there are broken drains under the building and the building is on the edge of a waterway allowing the toxin to be able to contaminate the waterway.

- Submits that installation of a sprinkler would compromise the product and the ability of the fire brigade to control any emergency.
- Submits there is a gravel build up behind the building in river.
- Notes vicinity of pre-school and centre of town surrounded by houses.
- Questions the integrity of Taha and seeks the consent be declined and the product be removed immediately – and seeks that the applicant has a minimum of \$10 million of liability insurance in case of a clean-up being required.

**Walter Allan James Hansen**  
Trustee – A&J Hansen Trust  
27 Main Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 222*

**Submission summary:**

- Expresses concern over storage without consent in place and seeks to have this removed by a fixed date safely.
- Seeks that Taha have public liability insurance in place and to pay a ‘substantial’ bond to the GDC for disposal and clean-up costs if company defaults.
- Asks about the risk management plan, flood and fire and earthquake assessments given the state of the building – does it have a safety certificate as there is known asbestos in the building and the owner says it’s too expensive to remove.
- Submits that emissions to air including ammonia gas, dust – does this have consent?
- Submits that the building leaks after heavy rain – is not satisfied with Taha’s response to these problems.
- Seeks the have the consent declined and have Taha pay a bond to GDC to cover all costs – and get public liability insurance – with removal within six months.

**Diane Stephanie Krs**  
PO Box 1388  
Taupo

Oppose

Wishes to be heard  
*Original submission page 45*

**Submission summary:**

- Submits on the following matters: Storage of hazardous substance without consent; Location of storage buildings to our property at 114 Kana Street; Storage buildings suitability; proximity of storage buildings to water ways used for recreation and drinking water source; storage of hazardous substance within Mataura town boundary; storage time limit factor; flood hazard; suitability of storage bags and pallets; security of stored product.
- Submits that there are many unanswered questions and assumptions and that a lot can go wrong. They have noticed an increase in dead rats around building on their evening walks.
- Submits that floods of unseen proportions are happening worldwide and this should be a warning to this situation.
- Opposes the application as there is no consent in place at this stage – questions how this happened and asks why it’s not feasible for Taha to move the product elsewhere until consent is granted.
- Questions why they were not advised sooner as an affected party given likely concerns over product. Reports less skink in yard than previously.
- States that their bedroom window is 30m from the entrance to 116 Kana Street and that over Christmas part of the roof was flapping in the wind and that it lacks suitable guttering and down pipes.

- States that it appears all roof are single skinned therefore they will be prone to condensation and dripping and expresses concern that any open bags are not sealed against this.
- Questions the location in between waterways and is concerned over potential effects of a disaster – on future water supply and the costs of trucking water to people and the cost to the fish industry. If product gets wet can it be moved? Where to? And who decides who's part of the clean up.
- Submits that the town is recovering from the Carter Holt Harvey and people are taking pride in the town – is concerned that their back yard will end up as a dumping ground for the unwanted product.
- Raises questions over the timeframes and where the two years starts from and is concerned over the commissioning of a new plant within the time frame. Raises several other concerns about Taha's business model and viability of the proposal.
- Refers to the recent flood history and makes a connection to global warming and the likelihood of increased and unpredictable flooding in the future – which increases the risk to the environment.
- Raises questions over the ability of bags to what is required as they are not being sealed. Also the proposed wooden pallets may also be subject to soaking up water. How are the bags seamed – stitched or sealed?
- Raises a concern over site security and the possibility of the product falling into the wrong hands.
- Seeks that the Council acknowledge the risks are too high with no guarantees as to safe and secure storage at this location – no consent and the product to be removed immediately.

**Russell Glenn Hearn**  
147 Main Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 196*

**Submission summary:**

- States opposition for the following reasons:
- Building on flood plain.
- Fire danger as old building – old electrical etc., plus cannot apply water to and is stored in 1t nylon bags and if fire occurred would be difficult and messy and being on a river bank raise environmental concerns due to leakage into river with resulting effect on environment down to the sea.
- States – won't be satisfied until all the product is totally removed from site and if consent is granted seeks a large bond in the millions to cover any clean up.

**Kathryn Erica Hearn**  
147 Main Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 190*

**Submission summary:**

- Strongly opposes storage in this site or in the area where housing and flooding are issues and in a location where there is food plant.
- States that Mataura and Gore are prone to flooding and the building is on the edge of the river.
- States that an environmental disaster would occur on the river and affect everything downstream to the sea.

- States that building is old and if a fire occurred using water – or any wet agent would expose the Ouvea pre-mix to moisture causing leakage and dangerous fumes to all the houses in the area.
- Seeks that the consent be declined and for the product to be removed immediately by a set date or a fine imposed.
- Submits that if consent granted that Taha should have in place a through risk management plan covering flood, fire earthquake and set such that Taha are legally responsible.
- Seeks regular site inspections as part of any consent granted.
- Seeks that Taha have large public liability insurance in place.
- Seeks that a bond is put in place for any clean up required – discusses various means and methods of how this may work and suggests a figure of \$5-10 million.
- States that if consent is granted that Taha and the landlord both have a duty of care to make sure the building is ‘coded’ correctly as it has been left for a long time.
- States that the health risks are a ‘real’ problem and has seen herself that some bags are stored right up to doors where there are gaps.
- States that in addition to homes and a freezing works that there is a ‘child day care centre’ nearby.
- Seeks that the application be declined and suggests that the product should be stored away from any communities and that the product should be stored at its source.

**Dennis William Rutter**  
14A Dover Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 43*

**Submission summary:**

- Seeks a time limit for the removal and for regular inspections – independent environmental professional.
- Refers to effect on river, and issues of building WOF, public liability, a suitable bond, fire and flooding, gas emissions and on this basis decline the application.
- Haas appended some photographs which can be seen in the appendices to this report.

**Sonia Christine Rutter**  
14A Dover Street  
Mataura

Oppose

Wishes to be heard  
*Original submission page 207*

**Submission summary:**

- Seeks rapid removal due to health risks and supports the submission by Dennis Rutter.
- Refers to long term effects – cancers , flooding, fire and vandalism, gas in to the air, ground contamination.
- Questions Taha’s credibility.
- States that bags are already leaking – cites photographic evidence. Potential effects on whole town, not just mill buildings.
- Asks that the Council or Taha buy their property.

**Mataura Landcare Group**  
Chairman  
Mr Duncan

Oppose

Wishes to be heard  
*Original submission page 165*

**Submission summary:**

- Comments on the quality of the application and mistakes within it.
- Submit that this product should stay close to Tiwai rather be trucked to the current location creating risk and state that they don't believe that a product can be created.
- Submits concerns about flood risk and climate disruption and that these will be difficult to predict over the next 50 years.
- Submits that there is a Water Conservation Order and Maori cultural values that attach to this that need to be respected for the benefit of the river, the fishery and the people and submits that the risk is too great.
- Submits criticism of the action of the Council in terms of consultation.
- Submits that the building must comply with the new requirements of the Building Act and earthquake strengthening.
- Submits that accountability to the local community is required and that a bond is required in the event that Taha fails or is not able to complete the clear out.
- Submits that economic concerns relating to Alliance are being put at risk.
- Submits that baseline measures for monitoring need to be put in place.
- Submits that the town of Mataura is seen as a target for 'dirty' businesses and that the community and jobs are being put at risk.
- Submits that a substantial bond is required.
- Seeks to have the consent declined and that conditions need to be imposed that outweigh the affordability for parties to proceed.

**Monique Armande Maccartney**  
11 Crawford Road  
RD 2 Gore 9772

Oppose

Wishes to be heard  
*Original submission page 170*

**Submission summary:**

- States complete opposition due to proximity to houses, local kindergarten due to emissions possible if contact with water and is concerned about the effect on the river.
- States that the product should not have been stored in the building which is dangerous – insecure and easily broken into – broken windows and due to location next to river.
- Submits that historically the building has flooded.
- Seeks complete removal of hazardous material to a land locked area with no possibility of endangering human health or animal life and submits that Taha should front up immediately with a substantial bond.