

**1. Tanenuiarangi Manawatu Inc. Oppose Wish to be heard**

Fundamentally oppose discharge of effluent and contaminants to Oroua River, which enter the Manawatu River and ultimately marine environment.

Consider that the water quality of both rivers impacting on fishing productivity limiting all ROM commercial fishing activities.

They note that a new land disposal site is proposed, but believe that contaminants entering environment persist beyond Affco site.

State that Manawatu River is a Site of Significance Cultural and expect analysis of effects on cultural connections.

**2. Jonathan & Dianne DeWiele Support Wish to be heard**

Support the application and note good consultation process.

No issue provided ongoing monitoring of groundwater and their bore as well as odour.

Seek ongoing communication and monitoring.

**3. George & Christina Paton Oppose & Support Wish to be heard**

Oppose discharge to water, state must be disposed to land or contributes to cumulative effects downstream. Submission notes that application seeks to increase discharge by 50%.

Support discharge to land that may enter groundwater.

Conditionally support discharge to land, subject to increase in land area.

Support discharge to air.

Oppose land use consent for structure.

**4. Waitarere Progressive Association Oppose Do not wish to be heard**

Oppose any discharge into Manawatu River that isn't potable water.

State that Affco is commercial concern and environment should not be degraded for profit of shareholders.

Submission states that the Manawatu River is heavily polluted, and cumulative effects of individual discharges lead to significant pollution.

Goes on to state that Waitarere Beach receives large amount of pollution from the Manawatu River due to south flowing current. Shellfish is considered by many to be unfit to eat.

Seek that the application be declined, or if granted for a 5 year term and the applicant acquire additional land and/or improve storage and treatment system.

#### **5. Fish and Game New Zealand Support & Oppose Wish to be heard.**

Partially support moves to discharge more to land. State that increasing land application would allow for better environmental outcome.

Notes the interrelated rivers systems, and that discharge of contaminants will ultimately adversely impact on Manawatu River. Manawatu River has significant value as adult trout fishery and provides essential trout spawning and juvenile nursery habitat.

Consider that water quality monitoring is inadequate and does not provide a full assessment on water quality and ecosystem values. The monitoring to date shows the discharge adversely affecting water quality, which does not meeting water quality standards. Consider elevated levels of contaminants which have adverse effects on aquatic organisms, terrestrial vertebrates and invertebrates as well as high levels of suspended solids, high turbidity and BOD.

Consider that current application significantly impacting on water resources, ecosystem values and trout fishery values and is contrary to part II, schedule 4 and section 88 of the Act, as well as RPS and regional plans.

Seek that the application be declined.

#### **6. Water Protection Society Inc. Support & Oppose Wish to be heard**

Oppose application to discharge water and seepage from treatment and storage pond. Support in part consent to discharge partially treated MWE to land.

Concerns include failure to minimize volume of waste produced, failure to provide sufficient storage, inadequate level of treatment, inadequate consideration of alternatives, river flow rate selection for discharge, preferential discharge of MWE to river instead of storage, analysis of cumulative effects, seepage and groundwater flow. Term not specified in application.

Wish to attend a pre-hearing

Seeking – decline application to discharge to Oroua River, with possible exception during river flows exceeding 3x median flows, depending on cumulative effects downstream.

Decline consent for seepage from treatment & storage ponds.

To allow consent for discharge to land subject to greater proportion (preferably all) to be discharged to land.

**7. Corny Andrews                      Support & Oppose                      Wish to be heard**

Oppose discharge to water, noting application seeks to increase discharge by 50%. States that all MWE must be disposed to land otherwise contributes to downstream cumulative effects.

Supports discharge to land that may enter groundwater

Conditionally support discharge to land, provided additional land areas to accommodate full land disposal.

Support discharge to Air

Oppose Land Use Consent.

**8. Mark Webley                      Support & Oppose                      Wish to be heard**

Oppose discharge to water, as contributes to cumulative effects. Notes that application seeks to increase discharge by 50%. States that it increases known and agreed adverse effects very significantly.

S Conditionally support discharge to land, provided additional land areas to accommodate full land disposal.

Support discharge to Air

Oppose Land Use Consent.

**9. Manawatu District Council                      Support                      Wish to be heard**

Reasoning – Proposed discharge predicted to cause lesser effects on water clarity and on concentrations of scBOD5, POM and total ammonia-N than current discharge.

Reduced DRP and SIN levels compared to current discharge.

Potential effects on periphyton growth likely to be significantly less.

Considers will result in cumulative improvement in water quality. Recognises that Affco is a major employer and contributes economic benefit to the District.

Seek that the application be granted.

**10. Forest and Bird**

**Support & Oppose**

**Wish to be heard**

Oppose discharge to water, consider insufficient assessment of likely effect on downstream biota and water quality, likely to be high negative effects. Unclear as to reasoning for flow rate chosen, as well as how this would reduce or avoid effects. States application to land are less risky and these have not been thoroughly investigated. Believes contaminant levels in MWE are high and present substantial risk to the Oroua River.

Oppose discharge to land, due to not enough land area being allocated. If also reduced volume of MWE produced, would reduce negative effects that result from discharge to water.

Partially support discharge to groundwater via seepage. Partial support due to inadequate analysis on groundwater effects, until thorough investigation undertaken, consent for seepage from treatment and storage ponds is opposed.

Would like to attend a pre-hearing.

**11. Manawatu Estuary Trust**

**Support & Oppose**

**Wish to be heard**

Support discharge of MWE to land as it utilizes full advantage of the natural UV.

Oppose discharge to groundwater, 40 year old ponds do not meet current agricultural practice, believe liner requirements should extend to all forms of agricultural processing.

Oppose discharge to the Oroua River, integrity of the river is of vital importance to Manawatu River flow. Except during floods, Oroua has flow classified as a stream.

Concerned about adequately recognising the status of the estuary, given its' RAMSAR status, one of only six in New Zealand.

Notes fragile dependence of ecology downstream.

**12. Kelvin & Kathryn Lane**

**Support & Oppose**

**Wish to be heard**

Support discharge of MWE to land as it utilizes full advantage of the natural UV.

Oppose discharge to groundwater, 40 year old ponds do not meet current agricultural practice, believe liner requirements should extend to all forms of agricultural processing.

Oppose discharge to the Oroua River, integrity of the river is of vital importance to Manawatu River flow. Except during floods, Oroua has flow classified as a stream.

**13. Shannon Progressive Association      Support & Oppose    Wish to be heard**

Support discharge of MWE to land as it utilizes full advantage of the natural UV.

Oppose discharge to groundwater, 40 year old ponds do not meet current agricultural practice, believe liner requirements should extend to all forms of agricultural processing.

Oppose discharge to the Oroua River, integrity of the river is of vital importance to Manawatu River flow. Except during floods, Oroua has flow classified as a stream.

Notes that Shannon Township is downstream of the discharge and have seen tremendous decline of river standards within a generation.

Notes that Cultural “rahui” place by Ngati Whakaterere on river use for health reasons is respected by the Shannon resident population.

Notes that present representation on own discharge has bough about contractual arrangement for fully land based discharge on land continuing to be farmed.

**14. Te Roopu Taiao o Ngati Whakaterere      Support & Oppose    Wish to be heard**

Oppose discharge to water. States that all MWE must be disposed to land otherwise contributes to cumulative contaminants and toxic effects downstream. Notes application seeks to increase discharge by 50% and this is unacceptable.

Oppose discharge to land where may enter groundwater.

Discharge to land is supported subject to natural filtration of Paptuanuku Mauri and subject to prior meaningful consultation with downstream Iwi of Te Roopu Taiao o Ngati Whakaterere and Hapu Iwi within rohe.

Discharge to air is supported subject to meaningful consultation.

Land Use Consent is opposed as all MWE must be disposed to land.

**15. Water & Environmental Care Association      Oppose      Wish to be heard**

Oppose application to discharge partially treated wastewater from storage pond system into land where may enter groundwater.

Oppose application to discharge secondary treated wastewater from Affco meatworks into Oroua River.

Oppose term sought for discharge to air permit, otherwise support this application.

Oppose application for discharge to land “as is” but support the intent. Make the comment that whilst acknowledging the land discharge is constructed to perform reliably, believe that opportunities should be explored to expand its capacity to minimise the total volume of MWE discharged to water and to mitigate further the effects of the combined discharge on the Oruous river component, beyond the summer period.

Oppose the application for land use consent.

**16. Nga Kaitiaki o Ngati Kauwhata Inc      Neutral      Wish to be heard**

Reserves right to introduce cultural and environmental experts at appropriate time, once all relevant disclosures and information has been received by Ngati Kauwhata Iwi.

**17. Jim Wilson, Merv Avery, Martin Wilson      Support & Oppose      Wish to be heard**

Will pay major attention to discharge to land activity. The land discharge is supported as a whole. Elements of the proposed land discharge will be considered and commented upon, leading to a consideration of the contribution delivered to the combined discharge.

Only general, broad comment will be advanced on the discharge to river.

**18. John Bent      Oppose      Wish to be heard**

Discharge to land generally supported but to protect the values of the Oroua and Manawatu Rivers, discharges to water both direct and indirect are opposed. Position is that there should be no discharge to the Oroua River below the 20<sup>th</sup> flow exceedance percentile and the emergency contingency be replaced by a *force majeure* provision.

Opposes 35 year term as may preclude the application of unknown future developments. Proposal is inadequate to provide for the social, cultural and economic well-being of the community and health and well-being of people.