

**BEFORE THE MANAWATU WANGANUI REGIONAL COUNCIL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of submissions on the Manawatu-Wanganui Consolidated Regional Policy Statement, Regional Plan, and Regional Coastal Plan for New Zealand Pharmaceuticals Ltd

**AND**

**IN THE MATTER** of hearings by the Manawatu-Wanganui Regional Council regarding the Manawatu-Wanganui Consolidated Regional Policy Statement, Regional Plan, and Regional Coastal Plan – Water

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**STATEMENT OF EVIDENCE BY DR RICHARD GARLAND & ANDREW LEWIS  
28 SEPTEMBER 2009**

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1. This evidence has been prepared by Dr Richard Garland, Managing Director and Mr Andrew Lewis, General Manager, New Zealand Pharmaceuticals Ltd. It has been prepared in support of the submission lodged by Mr David Bridges of Good Earth Matters Consulting Limited on behalf of New Zealand Pharmaceuticals Ltd.
2. There are four key points that we wish to elaborate on. These are:
  - The lack of acknowledgement that business plays in contribution to the environmental, economic and social wellbeing of the community
  - The failure to link policies to timeframes for implementation in a manner that will not adversely affect the viability of business in the region.
  - The imposition of environmental standards which impose costs which render businesses such as our unsustainable.
  - The imposition of costs, such as that are likely to arise from giving effect to policies such as common catchment expiry dates.
3. New Zealand Pharmaceuticals Ltd has recently undergone a process of renewing its resource consents to discharge to the Manawatu River. The discharge is a mixture of process wastewater, cooling water and stormwater. In preparing the application to renew these consents, New Zealand Pharmaceuticals Ltd took the approach that, as a company, we needed to implement the best environmental solutions that could be afforded. As a result, the application provided for separation of the discharge streams and the commitment to install process wastewater treatment and online monitoring and alarm of several key parameters.
4. Despite the significant improvements proposed in our application, New Zealand Pharmaceuticals Ltd came under significant pressure from Council officers and submitters to cease discharge to the river and dispose of all waste to land. Disposal to land was an option which had been considered, and soil scientists had been engaged. However, the expert opinion was that such disposal would be unsustainable from an environmental perspective, irrespective of financial considerations. New Zealand Pharmaceuticals Ltd concern is that the Proposed One Plan policy framework continues to promote land disposal over disposal to waterways. Such a policy framework does not acknowledge the significant degradation that would occur if company's such as ourselves were to discharge waste to land, and could affect the sustainability of our business.
5. The common catchment expiry date policy means that New Zealand Pharmaceuticals is likely to be subject to a significant re-consenting and /or review process every 10 years. Such timeframes are too short for us to undertake significant investment in environmental improvements. We are also concerned that the common catchment expiry date will require us to take an active role (ie via submissions, pre-hearing and hearing attendances) on other activities within the Manawatu River catchment to ensure that our right to exercise, and our ability to renew, our resource consent is not compromised. Having to take such an active process is considered a distraction from our core business, and is not a role which we wish to be involved with.

6. New Zealand Pharmaceuticals would like to see a policy framework which provided for long term adaptive resource consents. Such consents provide businesses with sufficient certainty to be able to invest in a site, treatment processes, and environmental improvements. The adaptive nature ensures that the business is required to focus on, and achieve, continued environmental improvements as technology and economic factors allow. As an example, New Zealand Pharmaceuticals Ltd has a resource consent condition which requires us to undertake Best Practicable Option reviews and, if appropriate, implement the Best Practicable Option, during the life of our consent. This approach is considered preferable to a short-medium term consent with a common catchment expiry date.
7. We would be more than happy to elaborate on any matters raised in our submission or this evidence in detail with the commissioners, if this will assist.