

Submission Form 16 to the Otago Regional Council on consent applications

This is a Submission on (a) limited notified/publicly notified resource consent application/s pursuant to the Resource Management Act 1991.

Submitter Details:

(please print clearly)

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I/ we wish to **SUPPORT** **OPPOSE** submit a **NEUTRAL** submission on (circle one) the application of:

Applicant's Name:

And/or Organisation: Dunedin City Council

Application Number: RM20.280

Location: Smooth Hill Brighton

Purpose: Landfill

The specific parts of the application/s that my submission relates to are: (Give details)

- Discharge Permit to discharge waste and leachate onto land, and discharge landfill gas, flared exhaust gases, dust and odour to air, and to discharge water and contaminants from an Attenuation Basin and sediment retention ponds, for the purpose of the construction and operation of a Class 1 landfill.
- Water Permit to take up to 87 m³/day of groundwater, and use of up to 50 m³/day of groundwater, for the purpose of managing groundwater collected beneath a Class 1 landfill.
- Water Permit to divert surface water within the Ōtokia Creek catchment for the purpose of the construction and operation of a Class 1 landfill and associated road realignment works.
- Water Permit to dam water within an Attenuation Basin for the purpose of the construction and operation of a Class 1 landfill.
- Land Use Consent to alter, reclaim and place structures on, the bed of waterbodies and wetlands for the purpose of road realignment works.

My/Our submission is (include: whether you support or oppose the application or specific parts of it, whether you are neutral regarding the application or specific parts of it and the reasons for your views).

We are opposed to all parts of the application. The fact that there is commercial waste and hazardous waste proposed to be concentrated for this landfill is concerning enough that we are doing the dump and leave. This is the time to be applying innovation and emerging technology to environmentally conscious results not using old methods that have been proven to provide minimal protection.

We believe that other solutions are possible with regards to resources (commonly termed as 'waste'), which are in true alignment with circular economy models, waste minimisation, resource recovery, and have overall significantly less environmental impacts. There are many examples of such models within this sphere, and we suggest a diversion of funds into Resource Recovery rather than investing in dumping our precious resources 'away' into Papatūānuku - as is the way with the current linear model. Local, highly successful examples of infrastructure for circular resource systems include Xtreme Zero Waste in Raglan, and Wanaka WasteBusters.

The current linear model of 'take - make - waste' is inefficient, a waste of valuable resources and not sustainable in the long term. Dunedin City Council has made a commitment to be Zero Waste AND Carbon Zero by 2030, and this landfill is in clear misalignment with these goals. The ORC waste plan is also well out of date, and we strongly recommend that such goals are woven into the fabric of the updated waste plan.

We are ultimately taking a pristine environment and turning it into contaminated land classification not being dealt with at the time but left to accumulate which will have a long term effect. From what is being expressed in these documents we do not see any future thinking of the impacts, that are not new, and actual ongoing remediation solutions. Monitoring in case things go wrong is not sufficient. We should ultimately be coming from if things go wrong (worst case scenario), how does this impact and is it/are they acceptable impact? Do we actually have and are we actually willing to address the potential impact or will we again use financial factors to do the bare minimum?
We strongly suggest that the council requests an alternate methodology for dealing with hazardous waste in landfill to reduce the impact of mixing and accumulative effects that will be an ongoing costly management into the future to come beyond the 40 year lifespan of the proposed landfill.

Additionally, we wish to comment on the fact that waste to energy is NOT a viable solution for our region, and this quote by Para Kore Marae Inc. highlights our concerns and reasons for opposition to this process incredibly well:

"In Māori culture, the relationships between land and humans are intimate. The Earth is our mother and the sky is our father. We are related to mountains, to rocks, to insects, to birds, to the rivers and bush, to all parts of the natural world. They are our ancestors, our relations. We are the teina, the youngest sibling, and part of the family of nature. We identify with landforms and the place.

Custodianship is passed down through generations, and the relationship is reciprocal: you look after the land; the land looks after you. Reciprocity is a highly regarded value within te ao Māori.

When we are incinerating waste, we are not looking after mother Earth. We're poisoning her. For us at Para Kore, incineration is like creating a landfill in the sky. Instead we need to look after Ranginui and Papatūānuku by being compatible with nature where rubbish is not part of the design.

Our mokopuna are our responsibility. A paradigm shift is needed where interconnectedness and manaakitanga are highly valued so that our hapū and iwi, our communities, our cities, our rohe form symbiotic relationships among all living and nonliving things. The mokopuna of tomorrow are relying on us to do the right thing and take climate action now."

“Waste incineration to get rid of waste and generate energy does not align with our tikanga (principles).

Our Pae Tawhiti is based on well-being and health, Oranga Taiao, Oranga Marae, Oranga Whānau (Healthy Natural World, Healthy Communities, Healthy Families).

We educate and advocate for system change from a Māori worldview.

Our work contributes to moving up the waste hierarchy, building a circular economy, increasing biodiversity, supporting climate justice and action, regenerating ecosystems and the collective aspiration to return to a Zero Waste Aotearoa NZ.

The cultural identity, values and mindset that we contribute to recognise connectedness, our inseparable connection with our hākuī Papatūānuku, and our matua Ranginui from whom we all descend. We seek the abandonment of the linear, individual, capitalist, colonial, consumer paradigm and the return to mindsets that encompasses values such as kaitiakitanga, whakapapa, maramatanga, manaakitanga and rangatiratanga.

Burning resources and creating greenhouse gases and toxic ash is a further breach of the Tiriti and a desperate attempt to maintain the status quo and current (destructive) system.

Para Kore supports the rapid transition from linear to circular systems.

Creating and burning waste further perpetuates the linear model of consumption. It can also perpetuate the demand for waste as the investment spent for the WtE infrastructure will need to be returned in energy.

Incinerating waste creates poison in the atmosphere and is similar to creating a landfill in the sky. The process of burning waste emits Co2 into the atmosphere and creates toxic ashes and greenhouse gas which further perpetuates climate change and climate crisis.

Incinerating waste does not allow for waste to be reused or repurposed. In cases, it requires extensive transportation and shipping to a central point, creating unnecessary pollution into our atmosphere. We advocate for local systems to manage waste, reducing additional energy and pollution entering our environment as a result of transport.

We advocate for New Zealand to have 100% renewable energy.”

Water Permit 1: Water Permit to take up to 87 m3/day of groundwater, and use of up to 50 m3/day of groundwater, for the purpose of managing groundwater collected beneath a Class 1 landfill.

Groundwater management will be a long term cost and management commitment. This is a situation which leaves no room for error, and indicates that this site is inappropriate for such operations. The continual management of groundwater to prevent leachate from reaching into the groundwater supply seems a waste of resources for this site with such a variant water table level across the site.

Water permit 2: Water Permit to divert surface water within the Ōtokia Creek catchment for the purpose of the construction and operation of a Class 1 landfill and associated road realignment works.

Diverting surface water of the catchment basin and Ōtokia Creek.

Diverting waterways has historically been incredibly detrimental to ecosystems in Ōtepoti. e.g. engineering of The Water of Leith which has been deeply studied and is well known to have significantly impacted the populations of native marine & freshwater life within the catchment. There is no real evaluation for extreme rainfall events due to climate change that could adversely overpower the systems proposed.

Water permit 3: Water Permit to dam water within an Attenuation Basin for the purpose of the construction and operation of a Class 1 landfill.

Attenuation basin - management of stormwater.

Disrupting the natural water flow and biodynamic of natural water pathways & ecology within the catchment area will have significant adverse effects as seen with the results of the Water of Leith engineering. The basin has also been tagged for emergency storage of leachate which SHOULD NOT be an acceptable option given that water from the Attenuation Basin is proposed to end up in the creek.

Discharge Permit: Discharge Permit to discharge waste and leachate onto land, and discharge landfill gas, flared exhaust gases, dust and odour to air, and to discharge water and contaminants from an

Attenuation Basin and sediment retention ponds, for the purpose of the construction and operation of a Class 1 landfill.

There are MULTIPLE waterways on this site, this will affect an entire catchment worth of marine and freshwater ecology. Affecting a large water system with toxins and leachate in a highly prized natural area for residents, visitors, and generations into the future. The site is a wetland area, which indicates that contaminated water will be widespread and extremely difficult to control.

Ōtepoti has a history of bad landfill management. We have the St Kilda site which is still affecting our whenua generations later, posing immediate threats to safety, health and wellbeing of all living, playing, and visiting the site & surrounds. We have the current landfill site which leachate management is a huge issue. We may not even be able to categorise the true extent of the damage until years to come.

Final word: This consent application is not complete to the standards required, and there are many questions still to be answered. The applicant has not provided certain information by necessary deadlines, and refused to provide requested information. As members of the public and deeply concerned parties, we do not find this acceptable and again wish to reinstate our stance of OPPOSING this consent application on all counts. It is deeply concerning that we are taking a pristine environment and turning it into a contaminated site without any form of ongoing remediation plan? In this century of human existence, with the knowledge we have of the damages of historical landfill leachate and effects to the water bodies and environment, not to mention the effects of livelihood damaged by pristine areas being affected, why are we not finding a circular economy approach for this? How is the status quo being dressed as the new which we are well aware are not good enough?

I/We seek the following decision from the consent authority (*give precise details, including the general nature of any conditions sought*)

In depth research to eliminate and remediate rather than minimise environmental effects.

We seek a denial of all permits and halting of the process of consent for this landfill. Subject to review of better practices in alignment with circular systems.

I/we:

- Wish to be heard in support of our/my submission
 Not wish to be heard in support of our/my submission

If others make a similar submission, I/we will consider presenting a joint case with them at a hearing.

- Yes
 No

I, **am not** (choose one) a trade competitor* of the applicant (for the purposes of Section 308B of the Resource Management Act 1991).

**If trade competitor chosen, please complete the next statement, otherwise leave blank.*

I, **am not** directly affected by an effect as a result of the proposed activity in the application that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

I, **do** wish to be involved in any pre-hearing meeting that may be held for this application.

I **do not** request* that the local authority delegates its functions, powers, and duties to hear and decide the application to 1 or more hearings commissioners who are not members of the local authority.

I **have** served a copy of my submission on the applicant.



Fiona Clements

15/11/2021

Signature/s of submitter/s

(or person authorised to sign on behalf of submitter/s)

(Date)

Notes to the submitter

If you are making a submission to the Environmental Protection Authority, you should use [form 16B](#).

The closing date for serving submissions on the consent authority is the 20th working day after the date on which public or limited notification is given. If the application is subject to limited notification, the consent authority may adopt an earlier closing date for submissions once the consent authority receives responses from all affected persons.

You must serve a copy of your submission on the applicant as soon as is reasonably practicable after you have served your submission on the consent authority.

Privacy: Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public, including publication on the Council website. Your submission will only be used for the purpose of the notified resource consent process

If you are a trade competitor, your right to make a submission may be limited by the trade competition provisions in [Part 11A](#) of the Resource Management Act 1991.

If you make a request under [section 100A](#) of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners.

You may not make a request under section 100A of the Resource Management Act 1991 in relation to an application for a coastal permit to carry out an activity that a regional coastal plan describes as a restricted coastal activity.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

The address for service for the Consent Authority is:

Otago Regional Council, Private Bag 1954, Dunedin, 9054
or by email to submissions@orc.govt.nz