

To summarise my evidence, I have been asked to advise if there are feasible alternatives to Smooth Hill for the disposal of putrescible wastes. My evidence identifies four viable options

- The Southland Regional Landfill at Browns near Winton
- Mt Cooe in Balclutha
- An alternative site in Clutha District between Balclutha and Waihola
- Extending the life of Green Island landfill

There is in the medium term the expectation that these wastes will be subject to Government initiated reduction programmes or processing to render them inert.

While DIAL is not a trade competitor with the proposed landfill it could be reasonable to consider that Nash & Ross, with which I am associated as a consultant, may be. I am not presenting to this hearing on behalf of Nash & Ross. Also, Nash & Ross's operation will not be disadvantaged by the establishment of a landfill at Smooth Hill. Smooth Hill will have substantially higher operating costs than the Nash & Ross landfill and it is likely to cause more waste to be diverted to the Nash & Ross facility than is presently occurring. This effect is already evident as wastes are presently being actively diverted from Green Island to the Nash & Ross landfill to preserve the remaining capacity at the Green Island landfill for domestic waste, by the manner in which DCC are charging for wastes. This is evidenced by the doubling of annual waste volume receipts at the Nash and Ross landfill over the past several years.

In my evidence I am not disputing that Smooth Hill may be able to be run in a manner that avoids attracting black backed seagull feeding or resting. I would however observe that the condition proposed by ORC regarding resident bird populations indicates that if there are failures in site management that attract gull populations that the landfill will be rendered inoperable for what could be extended periods. Or worse, that bird activity could cause significant damage or disruption to aircraft operating in to and out of Dunedin International Airport. Reliance on avoidance strategies for minimising gull populations is a very high-risk strategy particularly when there are clearly a range of low-risk alternatives available that do not appear to have been fully considered in the consent application.

The purpose of my statement of evidence is to illustrate that regardless of whether Smooth Hill is developed or not, there are workable and economically feasible alternatives to Smooth Hill for the disposal of wastes that have the potential to attract feeding birds. Separating out the potentially problematic wastes is not complex as the putrescible and non-putrescible wastes tend to be generated and delivered separately, only being mixed at the landfill. Nash & Ross's landfill provides a clear example of this, it receives some 90,000 tonnes of waste annually and any putrescible or compostable wastes are rejected at the landfill weighbridge. Nash & Ross also receive a further 20,000 tonnes of green waste at their associated green waste landfill where it is processed with a shredder and composted for reuse. It is also clearly understood within the landfill clientele that only specific classes of wastes may be disposed at the landfill.

As I note in my evidence, the Nash & Ross landfill does not attract feeding gulls. That doesn't mean gulls aren't present in the landfill environs because gulls that feed at Green Island landfill also cruise the wider areas and appear to prefer to rest on the rooves of industrial buildings some distance from the landfill.

The Burnside landfill will never be able to accept putrescible wastes, which puts it in the same situation as DIAL is proposing for the operation of Smooth Hill. The alternatives presented in my evidence are options that Nash & Ross themselves have considered when contemplating a

broadening of the scope of their operations. I would estimate that no more than 25% of the waste stream handled by DCC Green Island presently would require disposal at an alternative to Smooth Hill that was not within the 13km buffer zone around the Dunedin International Airport. This volume equates to between two and three 50 tonne loads daily during the working week. Waitaki District Council presently sends its domestic wastes 300 kilometres to the Southland Regional Landfill as backloads on agricultural lime deliveries to Canterbury. Nash and Ross receive wastes from Christchurch also as backloads, so transporting wastes over these distances is not difficult, unreasonably expensive, or unduly carbon intensive, as it is utilising idle capacity in heavy vehicles already making the journey.

These considerations are very important because landfilling provides an essential service to the City's economy. Any disruption to landfill operation that may arise from a breach of the proposed condition requiring that *All bird species specified in the Bird Management Plan greater than 50g feeding at the landfill or accessing waterbodies must be managed to zero densities daily. If this is not achieved over 3 consecutive days, then the landfill operation must cease, and material covered (including netting if necessary) until zero densities of birds over 50 g can be reached over 5 consecutive days.* will have very significant flow on effects throughout the economy as waste generation has no buffering capacity.