

IN THE MATTER

of the Resource Management Act
1991

AND

IN THE MATTER OF

application for a consent to
discharge MES to land at Oreti
Plains

BY

South Pacific Meats Limited

Applicant

**STATEMENT OF EVIDENCE OF KEVIN HAMILTON ON BEHALF OF THE
APPLICANT**

BACKGROUND

1. My name is Kevin Hamilton. I am the Manager of South Pacific Meats Limited.
2. My evidence is given in relation to an application lodged by South Pacific Meats Limited (SPM) to apply sludge derived from meat processing effluent treatment onto land at Oreti Plains, Southland.

SCOPE OF EVIDENCE

3. My evidence addresses the following matters:
 - (a) A description of the current activity, focussing on the technical aspects;
 - (b) The reasons for the proposed application;
 - (c) Properties that SPM supplies MES to; and
 - (d) Processing of application

ACTIVITY DESCRIPTION

4. South Pacific Meats Ltd ("SPM") operates an export meat processing plant at Awarua. Wastewater generated at the plant is treated via a pond system and the treated effluent is then discharged to the Invercargill sewer system. Biological breakdown processes in the system produce an organic sludge (referred to in my evidence as MES) which accumulates on the pond floor. This needs to be removed in order to maintain the design volume capacity of the pond (and treatment performance).
5. SPM has the requirement to remove approximately 4,000 m³ of MES annually. Road tankers will be used to transfer MES from SPM to Gladvale Farm in Oreti Plains where it will be spread to specific land areas via a slurry tanker.
6. The MES is applied to a depth needed in order not to exceed 150kg N/ha/year. That is approximately no more than a 10 mm depth annually. Further to this, MES will not be spread when soil moisture is at or above field capacity thereby limiting the risk of run off or leaching.

REASONS FOR LAND APPLICATION

7. The options available to SPM for dealing with MES are to dump it to waste, or find beneficial use options.
8. Dumping the MES to waste is the easy option involving paying for the material to go into a landfill. This option results in no beneficial use and valuable properties of the material permanently lost.
9. The beneficial use option involves putting the MES into productive soil/plant systems in a commercial agricultural context, enabling the productive value to be realised from what would otherwise be a waste product.
10. It is SPM's intention that having a number of properties growing agricultural crops to apply MES will provide alternative opportunities when soil moisture is favourable in one area but not suitable in another.

11. The application of the MES to land, so as to enable recycling of nutrients, is the option that best fits with both the environmental preferences of Environment Southland (ES) and the market position which SPM works to.
12. The Lindsay property at Oreti Plains has a large enough area of suitable soils to receive all of the 4,000 m³ of MES if required. The farming system will be enhanced rather than compromised by the activity. The owners of the property are in agreement with SPM on the MES being applied to the property and how it is to be managed.

PROPERTIES THAT SPM SUPPLY MES

McMillan

- The McMillan property is located at Garston. This property was consented in 2013 and was the first property to be consented to receive MES to land for SPM.
- This consent was given a five year term due to the scale of the activity and uncertainty of environmental effects. However, the distance to travel from Awarua to Garston was unfavourable and other properties closer to Awarua became available so the McMillan property was only used for two years.

Tayler

- The Tayler property is made up of two blocks located in Kingston and Garston. The consent to receive MES was granted in 2013. A ten year term was granted, primarily due to the fact that any effects would not be immediately observed and a period of time would be needed to identify the suitability of the system.
- As with the McMillan property, the Tayler property was used in the early days of the consent being granted and most recently in 2018/2019 when soil moisture levels were too high at another property.

Cairns

- The Cairns expressed interest in 2016 to SPM to take some or all of this MES to apply as a fertiliser and soil conditioner on their property at Otapiri Gorge near Winton. The property has 840 ha of land that is authorised to receive MES applications.
- The Cairns property has been the main property that SPM has carted to since 2016. This is because the travel distance to the property from Awarua compared to the McMillan and Tayler properties is much shorter.

Lindsay

- An option to use the Lindsay property arose in 2017 and would allow a further option for SPM if needed when the Cairns property is not available. The Lindsay property is a favourable option as it would be the closest property of all consented properties to receive MES from Awarua.

PROCESSING

13. SPM applied for a consent on 24 April 2018. This application was then limited notified in early July 2018 due to concerns about impacts on air quality. Since lodging, and notification, we have tried to work through and resolve issues such as term length, groundwater and surface water protection.

14. Communication between submitters and SPM started in November 2018 after the pre-hearing meeting in September 2018. This communication has raised historical local issues that relate to traffic and land management of the Lindsay property. Many issues are historical and I understand fall outside the scope of this consent application.
15. The questions raised in the pre-hearing meeting were answered by Lowe Environmental Impact (LEI) (SPM Consultant). These answers were then forwarded onto the submitters. Additional information was attached that included information about Micro plasma bovis, an Effluent Management Plan and SPM proposed updated conditions.
16. We have had responses from some (not all) submitters commenting on the information. This includes from Frances Wise (Suttons' consultant), Barry MacDonald and Catrina Thompson. Further follow up emails were sent out to answer these queries in late November/early December 2018.
17. Correspondence from Frances Wise (Suttons' consultant) and Barry MacDonald in December 2018 indicated that term length and historical issues meant that conditions could not be agreed upon.
18. Further correspondence in late January 2019 between Frances Wise (Suttons' consultant), Barry MacDonald, John and Diane Macdonald indicated that they did not agree to SPM's shorter term length of 15 years. Further to this differing view, historical land management issues that are unrelated to this consent were raised again. This resulted in submitters not wanting to agree to the consent conditions even though changes had been made to the proposed conditions to reflect the specific concerns that related to the MES spreading operation.
19. Agreement could not be met with submitters on the SPM proposed conditions, so in early February 2019 with processing time nearly fully utilised it was decided to proceed to a hearing.

CONCLUSION

20. It is requested that the proposed consent be granted, with conditions that reflect the effects the consented activity may be expected to have.
21. We request that historical issues relating to land management which are unrelated to this application are disregarded.
22. We support the recommendation of the ES staff in their s42A report.

Kevin Hamilton

4 March 2019