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This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

My submission relates to the whole application.

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- *the reasons for your views.*

I am very concerned about the impact of this facility on the residents, environment and property values in Te Awamutu. My daughter is due to start attending the Barnyard Daycare soon and it is very alarming that a facility such as this is being contemplated in a residential area, let alone right beside a daycare and other education facilities. The health of my daughter and family is of the utmost importance to me and to think that this could be jeopardized by the operation of this facility is extremely alarming. I beg you to please put yourselves in the shoes of families like mine with young children who live in the immediate area and how you would feel if carcinogenic plumes were being pumped into your environment. No facility is worth any human lives and if there is any question at all around the safety or impact of such facility, it should not be constructed.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the application in full.

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

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

I do not request, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: Madeleine Beeson

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/23 Contact person: Maddy Beeson
(name and designation, if applicant)

Postal address: 1 Wilson Street, Te Awamutu, 3800
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

We are not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

We are directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

Our submission relates to the entire application.

We believe that for the benefit and wellbeing of all Waipa residents, the Waipa District Council should not accept any aspect of this application.

Our submission is:

We Oppose all parts

- We wish to express our opposition to the establishment of an incinerator which will burn highly toxic industrial waste within a predominantly urban area.
- We believe that the health risks associated with the establishment of this plant in Te Awamutu, along with associated commercial and social effects, will be acutely detrimental to our immediate and surrounding communities.
- The proposed plant is a first for New Zealand - the company responsible for operating and managing the plant therefore has no previous history in this field we can rely on.
- The risk of potential exposure to poisonous toxins released into the atmosphere, land and waterways through smoke emissions or the disposal of the resulting toxic ash is terrifying. While we know that exposure to high levels of toxins/dioxins is deadly, who knows what the effects of long-term exposure to low levels will be?
- Te Awamutu is known nationally and internationally as the Rose Town. Our clean green image is important to us. Te Awamutu and surrounding towns rely heavily on agriculture and dairy farming. Any leakage/exposure to the environment of the toxic chemicals and products that this plant would handle would have absolutely catastrophic consequences, far out-weighting the potential benefits to the community that are claimed.
- Even if the safety of this plant could be absolutely guaranteed, we don't believe that the middle of a thriving town is the place for its location. There will be a significant increase in the number of heavy vehicles transporting waste into and exiting Te Awamutu residential areas. This creates not only nuisance and inconvenience to local residents, but also potential danger to our children who use these routes daily to travel to and from nearby schools, parks and recreation areas. This especially flies in the face of initiatives the local Waipa Council is currently promoting (ie walking and cycle paths), in order to encourage safe participation in outdoor activities within our communities.
- Urbanisation of Te Awamutu and the surrounding areas is being actively promoted by local and national government through high density housing initiatives. Once a quarter-acre was the site of



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

1 dwelling, now 4 homes are able to be built. Why encourage significantly more people to reside more closely together in a defined area and then significantly impact their wellbeing by creating an industrial environment which exposes them to potential effects of toxic pollution, long term health risks and significantly increased heavy traffic volumes.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

That all aspects of the application be declined, period.

I wish (or do not wish) to be heard in support of my submission.

We do not wish to be heard in support of my submission

(this means that you will not be advised of the date of the hearing and will not speak at the hearing)

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

We have served a copy of my submission on the applicant.

(this is required by section 96(6) (b) of the Resource Management Act 1991)

We request pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: J C Bain and KR Bain

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 12 October 2023 Contact person: Jane Bain and Keith Bain

Postal address: 44 Grey Street, Kihikihi

(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.



Submission on a Notified Resource Consent Application

Form 15

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

The entire application

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

Because of the people behind it.
Not for this town
Put it own Land

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the entire application

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 12.10.2023 Contact person: Above Ngairi Berryman
(name and designation, if applicant)

Postal address: 88 Rimu Rise
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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.

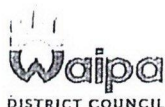
Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Submission on a Notified Resource Consent Application



Form 15

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

The entire application

My submission is:

Support parts or all of ☐ Oppose parts or all of ☒ are neutral parts or all of ☐
include—

- the reasons for your views.

Pollution - westerly wind Aspect.
blowing over the
toxins Cancer causing.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the entire application

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: _____

12.10.23

Contact person: _____

As Above

(name and designation, if applicant)

Pat Bayley

Postal address: _____

(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

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Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am am not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

ALL OF THE APPLICATION

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

Environmental Risk

Health Risk (Respiratory skills)

Lower Property prices

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I oppose this application. I want WAIPADC
to decline this application

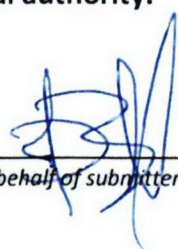
I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/23

Contact person: Jason Bartle Jason Bartle
(name and designation, if applicant)

Postal address: 502 McAndrew St Kihikihi
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Submission on a Utilised Resource Consent Application



Form 15

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

The entire application

My submission is:

Support parts or all of ☐ Oppose parts or all of ☒ are neutral parts or all of ☐
include—

- the reasons for your views.

Environmentally, socially, health-wise, there are no benefits to Te Awamutu or Waipa.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the entire application

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: B.A. Blake
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13-10-23 Contact person: B.A. Blake
(name and designation, if applicant)

Postal address: 1279 Fraser St, Te Awamutu
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

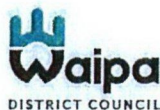
If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under 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 one 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.

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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

All of the application.

My submission is:

Support parts or all of ☐ Oppose parts or all of ☒ are neutral parts or all of ☐
include—

- the reasons for your views.

Please see appendix "A"

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Please decline this application as soon as possible.

Please see Appendix "B"

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

Submission from The Berkers Family Trust

Appendix A:

We have a small lifestyle farm on Racecourse Road with 2 dwellings and we have my daughter, son in law and 2 grandchildren living in one of these dwellings. We graze livestock and having lived here for 11 years we have witnessed growth in our town and seen a number of changes. We have many major concerns regarding the proposed Waste to Energy plant wanting to be built down the end of our road.

1; Traffic: Racecourse Road has been continually getting busier and using the Ohaupo Road intersection daily, I have experienced many challenges in getting across the road. We fear that with the extra trucks and traffic proposed for this road that this will just be multiplied, let alone the extra noise we experience from the trucks already. When the new development on the corner where Zion is proposing to build 40 plus dwellings, I can't imagine that the traffic issue will not be more accidents waiting to happen.

Personally we walk our dog most days on Racecourse Road and we will need to review this if there are some many more trucks travelling on this road.

2; Emissions: With the current application, there seems to be a number of missing reports on the effects to our town. Having listened and enquired from a few people with experience in these plants overseas, I am really concerned with the effect this will have on our health. There is little information of what happens when the ideal running conditions aren't met and when things go wrong. It is disturbing to hear of other places in the world with similar designed plants causing catastrophic health and welfare harm in these places.

3; Economics: With this proposal already causing a negative effect to business and land values, we are concerned with the drop of value our property has already experienced. We have had a property developer in the town already having issues with investors and the likelihood of laying off contractors. Also from other countries with these plants operating, hear that some rural towns have had their produce rejected due to contamination of dioxins and other pollutants. This would be the end of Te Awamutu as we know it if this happened to local farms in years to come. Let alone our countries heritage of being a clean green country.

From a personal perspective we have been seeking advice from local real estate agents and are very concerned that if we were wanting to sell our property that we would currently be looking at a 5 to 10 % decrease in our sale price. They have already had people, once being informed of the possible proposal, pull out of making offers or indicated that their offer will be reduced.

4; Better options: We have been made aware of other countries in the world that have been operating these plants for over 20 years, where they now see the effects, these have been having, looking and experiencing much better outcomes, not only for health but for the economy, by setting up zero waste type facilities to manage the waste. Surely this would make sense to learn from these places and skip the harm and trauma that we will experience if we want to learn by our own mistakes.

5; Common sense: I feel that all the facts presented from both sides of the proposal, one can't but feel that the common-sense outcome for this proposal is that it gets rejected asap to stop the harm it is already creating.

Please let this be the case and that we find a way to have this stopped as soon as possible.

Submission from The Berkers Family Trust

Appendix B:

I have listened to a number of presentations and opinions from both sides of the argument regarding this proposal. I was thinking that there might be a case for one of these plants in New Zealand but after watching and seeing the facts from research and first hand experience of other countries, I can now strongly agree with opposing any Waste to Energy plant to be operating in New Zealand. I would challenge anyone who has a heart for people and their health and wellbeing, to watch and read the presentation from Professor Paul Connett and then still think that this proposal should go ahead. The Professor has a lifetime of experience in the waste industry and seen first hand the effect these machines have to communities and countries.

There are too many holes in this proposal and questions that need answers, and I am sure you have a number of submissions already spelling out these that I feel it's a waste of your time and mine to elaborate on them. Here are a few though, just so that you are aware that I have some understanding of the facts and information shared.

- 1: Where is all the feedstock coming from?
- 2: How much diesel per week will this plant need to operate? Is the proposed storage adequate?
- 3: Who and how will this plant be monitored to ensure it is compliant? What will be the consequences be for non compliance?
- 4: What happens in an emergency? Is there a plan?
- 5: Will there be a report done on the effect of our peoples health? I understand this is a concern that this wasn't asked for after the last application was submitted.
- 6: Where and how will the fly ash not made into concrete be stored?
- 7: What will happen if the plant breaks down and the trucks keep coming with waste?
- 8: What happens if the central Government decide to outlaw these plants and who cleans up the mess?
- 9: Should central Government have a say in this proposal as I understand there is no legislation at present around these plants.
- 10: Who is going to monitor the traffic and what will the consequences for non compliance?

I can continue, but to be honest, I think some of the answers to these questions should be enough to decline the application and allow our community to start looking at positive ways to manage our waste.

Thanks for looking at our concerns.

I request/~~do not request~~*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Frank Berkers

Date: 8/10/23

Contact person: Frank Berkers

(name and designation, if applicant)

Postal address: 1/952 Racecourse Road Te Awamutu

(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one 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:
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This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

Traffic movements and air quality relating to health

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐

include—

- the reasons for your views.

The huge increase in trucks past our house will make living in our home very unpleasant. I am concerned about the air quality from emissions from the plant. We produce food at home and also our grandchildren live on the same property and so I am concerned for their health too.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Please decline the application.

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☒ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/~~do not request~~*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: J Benner
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 9-10-23 Contact person: Tristin Berkers
(name and designation, if applicant)

Postal address: 952 Racecourse Rd, Te Awamutu, 3800
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

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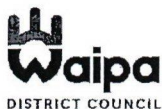
If you make a request under section 100A of the Resource Management Act 1991, you must do so in writing no later than 5 working days after the close of submissions and you may be liable to meet or contribute to the costs of the hearings commissioner or commissioners. You may not make a request under 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 one 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;
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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/~~am~~ not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am~~ not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

All of it

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

NZ has no legislation/regulation in place for this type of plant. The area is close to schools & farms & houses. Te Awamutu has an issue with inadequate road maintenance & will not be able to address the damage of 100+ trucks per day to the tarseal. PRD

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Decline the entire application from Global Contracting Solutions and let no waste to energy plant be built in Waipa area

I wish (or do not wish) to be heard in support of my submission.

☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)

☒ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)

☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

This is a ridiculous idea - we should be moving totally away from incineration, not embracing it.

The environmental impacts are not acceptable & the risks have not been eliminated, nor is enough known about them.

Waipa DC should be attracting businesses that can contribute significantly to the circular economy

- the Waste to Energy Plant is low level stuff compared to all the other options to reduce, recycle & potentially, the most harmful.

I don't believe the amount of employment, electricity or the reduction in landfill are worth it - find another way!

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/23

Contact person: Loren Rae Bennett

(name and designation, if applicant)

Postal address: 

(or alternative method of service under section 352 of the Act):

Notes to 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.

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

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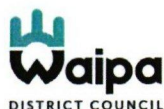
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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- 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:
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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am **not*** a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

My submission is:

Support parts or all of ☐ **Oppose** all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

My submissions relates to the whole application

- I oppose this application and I want the Waipa District Council to **decline** this application.
- I would like to be heard in support of my submissions
- There is currently no incinerators operating in Aotearoa, since the 2000, all have closed due to significant source of dioxin contamination.
- Global Contracting Solutions does not have any experience of operating in wate incineration.

Cultural Impact:

- The application doers not have a formal Cultural Impact Assessment
- This application is not compatible or support ecological corridor to link Maungatautari and Pirongia te aroaro o Kahu. The contamination to the whenua and Awa is unacceptable.
- - A fully informed consent from Iwi and Hapuu must be involved

Airt, Water and Land Pollutions:

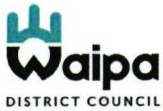
- The incinerator will produce dioxin with cancer-causing.
- The contaminated materials will enter to eco-system via the whenua and awa in the Te Awamutu Area including the greater Waikato District.
- Current application is lacking information about the whenua and awa contaminations.
- Stormwater from the site will discharge into the Mangapiko stream and will affect natural habitants of the awa.

Inappropriate Land Use:

- The proposed site is unsuitable for a large industrial plant.
- There is Dairy Unit currently in that area.
- The area is not identified as an area of industrial development in the District Plan,

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

- There is an existing planned residential housing schools and food businesses
- The changes to the Road structures and increased heavy traffic will impact negatively on the current residents on Racecourse Rd

Feedstock, Waipa wate minimisation, zero waste alternatives

- Incineration does not replace the need for landfills. Landfills will be required to store toxic ash waste; 23 tonnes/per day of toxic ash.

Human Health

- There is no human health assessment for this proposal

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☐ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: S.K.Bourke

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Soseto Bourke

Date: 12th October 2023

Contact

person:

(name and designation, if applicant)

Postal address: 1145 Racecourse Rd, Te Awamutu

(or alternative method of service under section 352 of the Act):

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 16B.

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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.

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

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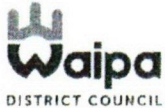
- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, 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.

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Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are attached.

My submission is:

Support parts or all of ☐ Oppose parts or all of ☒ are neutral parts or all of ☐
include—
• the reasons for your views.

I wish for the Waipa District Council to oppose this application

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the whole application.

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

By emailing copies of the form to richard.falconer@terrargroup.co.nz

I am strongly against the proposal to site the waste-to energy (W2E) incinerator close to a residential area, and farmland. This area is not identified as an area for industrial development in the District Plan. This will depress house and land values. It will stymie future residential growth in the vicinity of it, and have an impact on the Waipa Council's ability to plan for growth. It is near the Mangapiko stream and the area is subject to flooding. Most of the site is designated a High Risk Flood Zone. Because of this, the incinerator may become uninsurable, and the Community left with the clean up bill.

The impact of trucks transporting waste from areas outside the town will have an impact on the movement of traffic, and the noise created from the continual rumble of trucks will impact the community. As the incinerator will run 24/7 and requires a constant source of 'fuel' (waste) there will need to be stockpiles of trash with the attendant odour and flies particularly in summer.

The installation of the incinerator will send a message to the community, that the Waipa Council and the Government is not committed to reduction of waste. It will reduce the incentive to reduce, reuse and recycle. This is not what Waipa, New Zealand and the whole world is aiming for: The world, and in particular America, has moved away from this mass burning of waste. When successive Governments push for zero waste, and better energy sources are developed, the incinerator will work less efficiently with less waste to burn, which in turn will have an impact on air quality.

The incinerator has significant risks and will release pollutants – very tiny particles, into the atmosphere, including particulate matter, heavy metals, dioxins and furans. These pollutants will have an adverse effect on residents, farm animals, farmland and food sources, and contribute to air quality problems. A fully informed and clear disclosure of the impacts on human health and the environment must be provided. The problem arises of what to do with the bottom ash – as it is hazardous waste it cannot go into the landfill. The establishment of a hazardous waste area negates the reason for the incinerator in the first place. It may appear that with monitoring the W2E incinerator will have no issues, whereas in practice the community will be subject to a very different result, as long-term results reveal the impact on health and the food chain. The facility would have a carbon footprint many times greater than the same amount of waste being sent to landfill.

The W2E incinerators are highly technical and the proposal is from a new company, Global Contracting Solutions Ltd (GCS) which has no prior knowledge nor expertise in establishing and operating a waste to energy incinerator. They wish to try out their fledging wings on the people of Waipa, and that is too much of a risk to community. The Waipa Council cannot use a 'cross your fingers' mentality on such a critical health and safety issue. GCS, as a new player in managing a W2E incinerator may be slower to pivot and adapt to changes in regulations or stricter emissions limits in the future. This again would impact the Waipa Council and the community with increased costs. Who will monitor GCS? Scientists will need to be utilised to understand and interpret the complex results – this too will add extra cost on the Waipa Council.

I am totally against the granting of a non-complying land use consent to Global Contracting Solutions for this enterprise of a waste-to-energy incinerator.

I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13 / 10/ 2023

Contact person: **BILL BURR**

(name and designation, if applicant)

Postal address: 180 Arapae Road, RD 1, TE KUITI

(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are **attached**.

My submission is:

Oppose all of



- the reasons for your views.

I wish for the Waipa District Council to oppose this application

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the whole application.

I wish (or do not wish) to be heard in support of my submission.

YES - I do wish to be heard in support of my submission
(this means that you will speak at the hearing)

YES - If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

YES - I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

By emailing copies of the form to richard.falconer@terrargroup.co.nz

I am strongly against the proposal to site the waste-to energy (W2E) incinerator close to a residential area, and farmland. This area is not identified as an area for industrial development in the District Plan. This will depress house and land values. It will stymie future residential growth in the vicinity of it, and have an impact on the Waipa Council's ability to plan for growth. It is near the Mangapiko stream and the area is subject to flooding. Most of the site is designated a High Risk Flood Zone. Because of this, the incinerator may become uninsurable, and the Community left with the clean up bill.

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I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13 / 10/ 2023

Contact person: **Helen Browne**

(name and designation, if applicant)

Postal address: 598 Mangaorongo Road, RD2, Otorohanga 3972

(or alternative method of service under section 352 of the Act):

Notes to 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.

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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

My submission relates to the whole application

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.
-

I have lived in Te Awamutu for over 20 years since moving to New Zealand from the UK in 2000 along with my wife who was born and raised here, to enjoy a cleaner, greener lifestyle and more sustainable environment in which to start and raise a family. I have many significant concerns about the proposed waste-to-energy incinerator and my objections, concerns and reasons for requesting that this application is declined are as followed, with each of these discussed in further detail below:

1. Significant deviation from the recommendations of the Government's "Waste to Energy Guide for New Zealand" published by the Ministry for the Environment in August 2020
2. Non-compliance with Waipa District Council District Plan
3. Inadequate consideration given to the significant short-term and accumulated long-term adverse effects on health, wellbeing and the environment
4. No details on how and where highly toxic fly ash will be disposed
5. Reluctance to implement a continuous monitoring system (CEMS) for the proposed plant
6. Inaccurate and poorly substantiated claims of helping to achieve a Circular Economy
7. Noise and atmospheric pollution from proposed truck movements
8. Proposed site of the plant being in a known High Risk Flood Zone and lack of consideration given to the storm water run off to nearby waterways
9. Inadequate consideration giving to the significant social and economic costs which will be borne by directly affected residents and the wider Te Awamutu population
10. Deliberate lack of prior consultation with the local community

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Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
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11. Poor track record of Global Contracting Solutions Limited (GCS) in operating within resource consents
12. Direct and significant effects on my family

1. Significant deviation from the recommendations of the Government's "Waste to Energy Guide for New Zealand" (Ref 1)

The government's guide on waste to energy (GoWE) (REF) presents aspects of the New Zealand context that are relevant when considering waste to energy (WtE) proposals, four basic principles to consider, and a summary of the basic questions that should be asked by anyone considering a WtE proposal. The GCS proposal clearly fails to satisfy many of the issues raised and provides an example of a proposal that **should not** be considered suitable under the auspices of this document. For example, under the section titled "Renewable or non-renewable feedstock?" the document states quite clearly that "Technology that uses renewable feedstock is likely to be preferable, because it aligns better with environmental and circular economy values. It also supports the Government's target of 90 per cent of electricity from renewable sources by 2025". Yet the GCS proposal is based on using entirely non-renewable, based on the definitions contained in the document. Additionally, the document states that "Deciding where to locate a WtE plant safely, and ensuring it would have access to sufficient feedstock, might provide quite a different challenge in New Zealand than elsewhere." and explains that if feedstock "needs to be collected from further away, transport may be a problem. New Zealand's road and rail network is not always adequate for transporting large (and potentially hazardous) loads. Transport may also add to the financial and environmental costs and increase the emissions profile of the proposal". This is exactly what the GCS application proposes, that almost the entire feedstock for the project will need to be transported from hundreds of kms away via hundreds of heavy trucks every week. The road links into Te Awamutu rely heavily on already congested routes, and there are few viable alternatives to the single main routes in from the North and East. Given that this plant would need to operate continually at full capacity it is a terrible idea to propose a project that requires a permanent, continuous requirement to ship hundreds of thousands of tons of hazardous waste all around the North Island, from Auckland to Tauranga, on a daily basis for decades to come. There is also the direct effect this transportation will have on the already poor state of the roading network, and the significant increase in greenhouse emissions from the trucks themselves. There is no consideration or discussion of this in the proposal.

With regards to harmful emissions, The GoWE asks "What contingency plans are in place if something goes wrong and harmful emissions or residues escape into the environment? Does the proposal include strong risk management and contingency planning?". It is hard to accept that a proposal which specifically (and repeatedly) denies the requirement for a continuous emissions monitoring system (CEMS) or indeed any "very stringent" monitoring, could be regarded as showing due concern for strong risk management. There is also no consideration for contingency management in the event of an emergency situation, and this is particularly relevant as Te Awamutu has only a small, volunteer fire station. The response time for back-up fire fighting support from Hamilton, or further afield could lead to a significant emissions event.

Under the "Commercial viability" section of the GoWE, the question is asked "How established is the technology or is it still experimental? Are there examples of the same technology functioning at a similar

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scale and with similar waste streams elsewhere?”. As clearly stated by the GoWE, New Zealand has its own particular considerations around WtE plants and therefore one would have to look at existing plants operating in New Zealand on a similar scale, with similar challenges around feedstock supply and location adjacent to existing residential communities, schools, and farmland. And the answer here is that there are none. Not a single one in operation. There are currently several other proposals for WtE schemes in New Zealand, and these have all been met with strong resistance from local communities, organisations such as Zero Waste and Go Eco, and **even the Government themselves**. In fact, in response to the proposed plant in Waimate, “the Environment Ministry warned the Provincial Growth Fund that the proposed project did not stack up economically or environmentally” and “the scheme had enormous flaws” (Ref 2). The Waimate proposal has since been placed on ice by the Regional Economic Development Minister, Shane Jones. Another recent proposal for a WtE plant in Fielding has been declined and will not go ahead, with Stuff reporting one expert as saying “it [Fielding WtE plant] is the worst application for a permit they have seen.” and that despite this the company behind the proposal still “believes its plans are sound, even though some of its processes are based on a similar plant that was shut down after violating various regulations.” (Ref 3). Even outside New Zealand, it is becoming harder to find WtE incinerator plants. Europe, in particular, has a history of allowing such plants to be built but now after 20 years or more they are finally moving away from WtE incineration for many reasons, particularly carbon emissions. A recent independent report commissioned by the Minister for Green Skills, Circular Economy in Scotland concluded that a moratorium should be placed immediately on new waste-to-energy incinerators. The report itself appears to have been commissioned largely outgrowing concerns and evidence that the industry was creating more demand for waste, rather than help reduce it (Ref 4). We, in New Zealand, are in the fortunate position of being able to learn the lessons of the last few decades of incineration projects elsewhere around the world, instead of repeating the same mistakes.

Lastly and perhaps most importantly, the GoWE document makes significant reference to Community support and asks several key questions. This entire section has been largely ignored or deliberately avoided. There has been no socio-economic impact assessment carried out to understand the potential effects for those living near the proposed plant (Appendix A, 21). There has been almost no consultation with the Community (Appendix A, 22). In fact the original application to Waipa District Council specifically requested a non-notifying consent process. This clearly indicates that GCS expected significant community opposition and was attempting to subvert this process entirely. No concerns have been identified and addressed (Appendix A, 23) and no proposals are included to reflect good neighbour and corporate citizen principles (Appendix A, 24). There is mention of benefits to the community but these are tenuous, difficult to measure and largely unenforceable. This is covered in Section 12 of this submission.

2. Non-Compliance with Waipa District Council District Plan

The GCS proposal does not comply with the Waipa District Plan in several ways, including noise, building setbacks, height of chimney stack, landscaping and screening. These are all significant issues for the community, particularly for the residents directly affected by the noise and visual impact of the plant and the hundreds of additional trucks travelling along residential roads, past houses, schools, bus stops and daycare centres. The GCS proposal deals only very superficially with the issues and provides little comfort to those who would be affected. The district plan was put in place to help map the future of the

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region and proposals that contradict this plan should be decided by the wishes of the community, in the interests of the community; not in the interests of a private, profit-based company.

3. Inadequate consideration given to the significant short-term and accumulated long-term adverse effects on health, wellbeing and the environment

The GCS application includes no independent assessment of the short-term and accumulated adverse effects of running the incinerator for 10 or 20 or more years in extremely close proximity to residential housing, schools and farmland. In response to the rejected proposal for a WtE incinerator Fielding, Horizons Regional Council issued its own independent air, water and land reports on the proposal. There has been no equivalent process undertaken by either Waipa District Council or Waikato Regional Council so we are forced to rely on the figures presented by the applicant, GCS. **It would be incredibly naive to believe these figures would not be at the very lowest end of any various modelling scenarios/processes as it is entirely in the interests of the applicant to present the lowest figures possible. Any modelling of a process which has so much variability (e.g. wind and climatic conditions on a given day, the continuously changing proportions of various materials in the feedstock, the presence of unexpected out-of-spec operation) is always going to be subject to significant deviations in practice, and also subject to significant differences across different modelling techniques and principles.**

Regardless of the actual amounts of toxins emitted, there is no argument from any party that there will be at least some - and there is no **safe** level. Much of the harmful material emitted (even in relatively minor quantities), such as nanoparticles and dioxins, is widely known and accepted to accumulate in the environment and enter the food chain in far greater concentrations than the airborne figures. International research has also shown significant long-term accumulation of toxins up to 10 kms from WtE incineration facilities. The toxins discussed in this research affect intellectual development in children and lead to increased fertility so it is worthy of significant consideration.

4. No details on how and where highly toxic fly ash will be disposed

There are no details of how and where the highly toxic fly ash will eventually be disposed. The more efficiently harmful toxins are removed from the emission profile of the chimney stack, the more toxic the fly ash must necessarily become. There is no mention of how this material will be transported to its final resting place, or where this final resting place will be. The disposal of the fly ash is a huge problem for countries using WtE incinerators. In Germany and Switzerland the fly ash is bagged and placed into salt mines; In Japan many incinerators vitrify their fly ash and even some bottom ash, at significant cost, to prevent leaching; Denmark sends all of its fly ash to Norway; and in the UK the fly ash is disposed of in hazardous waste landfills. GCS proposes using some of the bottom ash for concrete but there is no detail on what exactly is happening with everything else.

5. Reluctance to implement a continuous monitoring system (CEMS) for the proposed plant

In the initial application to Waikato Regional Council (WRC), GCS dismissed the need for a Continuous Emissions Monitoring System (CEMS) and WRC further reiterated that they did not believe this would be required, and would not be implemented, in their response to WRC's request for further information. Their response states that "Continuous Emission Monitoring is normally only warranted where very

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stringent controls on discharges are required" and "The potential effects are regarded as minor to less than minor" (Additional documentation "Re: Request for further information under section 92(1) of the RMA", para. 15). This is despite detailed studies of incinerator plants around the world clearly showing that the emissions detected via CEMS are typically an order of magnitude higher than those detected via the spot check method proposed by the applicant.

This clearly implies that GCS does not believe stringent monitoring of extremely toxic and harmful emissions is required for an incinerator plant that literally borders existing and planned residential housing, several schools and daycare facilities, agricultural land, and dairy pasture. This is incredulous. Where else could there possibly be a greater case for "very stringent" monitoring? This reluctance to employ continuous monitoring can only be put down to the financial cost of installing, operating and maintaining CEMS (or perhaps more nefariously an unwillingness to be accountable for the true emission profile of the plant). This adds further weight to the fine margins of economic viability for a plant such as this, and highlights whether the primary focus of the plant is to provide a safe alternative to landfill or simply to make money where corners will be cut wherever necessary to ensure the plants financial survival.

We are talking about the health and wellbeing of an entire community, as well as the health of the surrounding dairy, agricultural land and food chain. How on earth could anybody even consider this a "minor" risk and not worthy of "stringent controls", especially considering the terrible health and environmental consequences associated with these risks. Together with the applicant's repeated reluctance to implement CEMS, this clearly shows they have little regard for the effects of the proposed plant on the environment or the community, and are quite happy to simply dismiss any concerns out of hand.

6. Inaccurate and poorly substantiated claims of helping to achieve a Circular Economy

The governments of all developed countries are now forcing the hands of their citizens to make better choices for the environment and generate less waste in order to transition to a Circular Economy, for example increasing costs to consumers of rubbish disposal, enforcing packaging laws on supermarkets, setting deadlines for sales of petrol and diesel vehicles, etc. As a nation, and a world, we have realised that we need laws and regulations to make the change happen; too many people are not going to do it by themselves, whether through personal gain, ignorance, denial, financial greed or laziness. Building an incinerator plant in NZ goes against all of this. It will remove pressure on individuals to change their mindset and work towards a sustainable future. Instead it will reduce the incentive to recycle and reuse, reduce packaging waste, reduce manufacturing byproducts, and reduce diesel and petrol consumption. It is going in completely the opposite direction to everything we know about climate change and the critical future of the environment. It is not sustainable, in any sense of the word, not financially, not morally, not environmentally. As a nation we are (and should be) focussing on increasing the amount of energy we generate from sustainable sources, not relying on crude, lazy, outdated methods such as simply burning our rubbish. As recently as earlier this month Christopher Luxon was quoted as saying "National wants a growing New Zealand economy powered by clean energy from our abundant renewable energy, including from offshore wind" (Ref 5).

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There are so many demonstrably better ways to deal with waste, with successful schemes all around the world, and locally. For example the highly successful Xtreme Waste project in Raglan which has diverted over 14000 cubic metres of waste from landfill and returned almost \$2m to the community this year alone. If we are too ignorant, blinkered, and lazy to look at what is happening around the world and see how we can do far, far more for the environment than just lighting another fire, then the legacy of our 'experts', scientist, law makers, politicians, regulators and government will be to catastrophically fail ourselves and our future generations.

Hundreds of incinerator proposals have been rejected or scrapped around the world over the last 30 years due to the overwhelming weight of evidence pointing to the devastating environmental effects of these plants, and the fallacy that they produce 'green' or 'sustainable' energy. As far back as 2016, Destiny Watson, a schoolgirl from Baltimore, was awarded the Goldman Environmental Prize (effectively the Nobel Prize for the environment) for leading a drive to reject an incinerator proposal 1 mile from her school (Ref 6). It took a schoolgirl to force the decision-makers to come to their senses and realise their ignorance. And yet, almost unbelievably, some 8 years later we are faced with another incinerator proposal being touted as 'benefiting the environment' and producing 'green energy', in the heart of an agricultural and dairy region, less than one kilometre from nearby schools and daycare centres, and immediately adjacent to existing and planned future residential areas.

This is not scaremongering - the pollution of the environment, associated health risks and contribution to climate change have all been proven repeatedly and categorically. This should not be open to discussion.

7. Noise and atmospheric pollution from proposed truck movements

The significant increase in noise and diesel pollution, and subsequent impact on currently quiet residential streets has not been addressed at all in the GCS application; and there is no assessment of the impact on localised road conditions. It has been entirely ignored and yet it will have a profound effect on the quality of life along these roads, and significantly reduce the value of properties in the vicinity. And of course there is no suggestion of compensation to these households. The same will be true along the affected parts of State Highways such as stretches of Ohaupo Road and Cambridge Road within the town boundary, and sections of Ohaupo Road running through the village of Ohaupo. There is already more than enough heavy traffic regularly using these roads through the middle of town as thoroughfares when travelling between North and South or East and West. The remaining stretch of Racecourse Road that does not currently consist of housing is along the racecourse, and this land is earmarked for future housing development, further adding to the residential nature of this road. At some point in the future it is likely that Te Awamutu will look to remove this heavy traffic entirely from the town, instead developing purpose-built bypasses for through traffic. This would make it almost untenable to maintain the requirement for hundreds of heavy trucks to access the Racecourse site on a daily or weekly basis.

As a local resident who, along with my children, regularly walks along Racecourse Road (it is on my children's walking route to school), I can say with certainty that the vast majority of traffic we witness on that road currently consists of private cars travelling below the advertised speed limit. It has the feel of a quiet residential street. Adding hundreds of heavy trucks to that road every day, or even every week,

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would change the characteristics of the neighbourhood beyond recognition. Over the last 20 years that we have lived on Ohaupo Road, the frequency and weight of trucks has steadily increased, and the quality of the road surface has steadily decreased. The current surface is poorly laid, large-grade, chipseal, and is rough, extremely noisy and far from what could be reasonably considered suitable for even the existing traffic load. With the addition of hundreds more heavy trucks on a weekly basis the noise and exhaust pollution along these roads will increase noticeably. Noise is a widely recognised stressor and has been clearly linked with poor sleep, increased cancer risks and many other undesirable effects. None of this has been considered in the GCS proposal and again shows a disregard for the effects it will have on the community.

8. Proposed site of the plant being in a known High Risk Flood Zone and lack of consideration given to the storm water run off to nearby waterways

Almost the entire proposed site is an identified floodplain, and most of it is designated a High Risk Flood Zone. A large-scale building development on this site would reduce the ability of the bounding river to spread out and absorb extreme events, and consequently increase the risk of flooding of nearby roads and properties. Despite the site being in a High Risk Flood Zone, GCS are proposing to construct the main building lower than existing requirements. The only explanation for this can be reducing costs, adding further evidence to the fragile economic tenure of the entire project and another example of how they will cut corners wherever necessary without due regard to the potential repercussions. We have all seen in very recent times the devastating effects of flooding in NZ due to hitherto unseen climatic changes and associated weather events. Extreme weather events are predicted to increase in frequency and severity as climate change continues apace and insurance companies are issuing strong warnings to New Zealanders not to build on floodplains due to climate change.

There is no consideration in the application to the incidental discharge of surface stormwater into the bordering Mangapiko Stream, which has significant cultural and historical meaning to the region. Any storm water run-off would be likely to be contaminated with heavy metals and dioxin as it would be impossible to remove all traces of such toxins that occur on-site. One of the emissions produced from tyre-based feedstock is zinc oxide which is highly toxic to aquatic life, and there is no modelling of any potential effects within the application. Locating an incinerator plant, which is designed to use tyres as a large proportion of feedstock, adjacent to an existing waterway makes absolutely no sense. During any flooding event, the consequences for this important ecological waterway could be devastating.

9. Inadequate consideration giving to the significant social and economic costs which will be borne by directly affected residents and the wider Te Awamutu population

There is no modelling, study or consideration given to the social and economic costs to the community if the proposed plant goes ahead. Despite the applicant suggesting they will use landscaping to minimise effects on the community aesthetics, there is no doubt the presence of a large-scale incinerator plant, dominating the landscape, will have a significant effect on property prices throughout Te Awamutu and the wider region. It would be visible from as far afield as Pirongia Mountain, and multiple streets and viewpoints within the town and wider community. Estate agents and property managers in Te Awamutu have already begun disclosing the incinerator application to potential property vendors, purchasers and developers as part of due diligence and disclosure requirements. They fully expect property prices to

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take a significant hit, and this is likely to be substantial in the immediate vicinity of the site. The Waipa and wider Waikato region is well known throughout New Zealand for its green pastures, dairy farming and agriculture. There is no doubt this reputation would be tarnished with a WtE incinerator plant located right bang in the middle, and this would surely cause economic fallout. Regardless of any health assurances, people are not going to be keen to eat meat and crops, consume dairy products or drink milk that has been produced immediately adjacent to the plant or cultivated in the vicinity.

Waipa and the wider region has a growing eco-tourism industry with attractions such as the globally recognised Maungatautari Sanctuary Mountain ecological island reserve (Ref 7), the Taiea Te Taiao ecological corridor (Ref 8), and Pirongia Forest Park. The environmental dangers to these initiatives from the proposed incinerator are significant, not to mention the tarnishing of their reputations.

Wealthier families may well decide they no longer wish to live in a town or district that is overshadowed and tarnished by the presence of an incinerator plant, and the entire socio-economic balance of the community could shift, leading to a poorer economy and less opportunity for work. It is no surprise that all around the world, the areas in the vicinity of large-scale industrial plants, such as this proposed incinerator, are the poorest areas in their respective regions. Presented with a choice, nobody would choose to live next door to a WtE incinerator, and so those that can will move away, and those that can't will be left to face the consequences. There has been no socio-economic assessment conducted by the applicant to establish what effects the proposed plant might have on the region, and this is unacceptable.

10. Deliberate lack of prior consultation with the local community

In their original application, GCS requested a non-notifying consent process. This can only be seen as a deliberate attempt to 'sneak' the consent through behind the community's back. If, as GCS have claimed in several press statements, they are doing this for the benefit of the community and the environment, then they would have gone out of their way to engage the public from the very outset. It is only through the Waipa District Council's decision to make the consent public that the majority of residents found out about the proposal. Waipa District Council, not GCS, wrote to 400 residents and businesses close to the proposed site, advising of the application and letting them know how to make a submission. Even then, it is staggering that neither the Council nor GCS considered that this would have a significant impact on **every** resident of Te Awamutu. GCS and Waipa District Council should have written to every household and business. As mentioned earlier, the Government's "Waste to Energy Guide for New Zealand" (Ref 1) lists **strong community support and engagement** as a key indicator of whether a WtE incinerator proposal might be viable. The process followed by GCS to date could not be any further from this, and the enormous outrage and push-back from the community since they learned of this proposal clearly indicates beyond doubt that there is no community support for this proposal.

11. Poor track record of Global Contracting Solutions Limited (GCS) in operating within environmental resource consents

As recently as 2022, Global Metal Solutions Limited, the company behind GCS, was successfully prosecuted in the Environment Court at Auckland for breach of resource consents, specifically "Avoid,

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remedy, or mitigate an adverse effect on the environment". The ruling tellingly noted that in addition to the breaches being upheld, the respondent Global Metal Solutions Limited (a) failed to explore the possibility of settlement where compromise was reasonably expected; and (b) advanced arguments without substance, technical or unmeritorious points of defence were taken, and its case was poorly pleaded or conducted. This demonstrates a blatant disregard for the resource consent process and the adverse effects of their operations on the environment and neighbouring community. In this particular case, the consents related "only" to noise levels and the adverse effects were relatively minor. But taking a similar approach to running a WtE incinerator plant could have devastating, permanent consequences for the community. This company should not be allowed anywhere near any environmental or health sensitive operation.

12. Direct and significant effects on my family

Maybe 50 or even 20 years ago, before the adverse effects of incineration plants were widely known, and climate change was not a concern, it is possible to imagine an energy plant such as this being seen as somewhat beneficial. But in today's society, where the terrible health and environmental consequences of an incinerator plant are so well researched, documented and established, anybody proposing such a project anywhere in NZ would have to be either completely ignorant or terribly misinformed, or worse still have a total disregard for the health and wellbeing of the surrounding community and the environment as a whole. And to suggest locating such a plant in the heart of an established community, adjacent to school and houses, and surrounded by agricultural and dairy land is mind-boggling.

As an educated, well-informed adult I would not live anywhere near a waste to energy incinerator plant, and as a conscientious parent it would be absolutely impossible for me to remain in the district and allow my young children to grow up in the shadow of such an abomination. Fortunately I have the financial means to relocate my family, albeit this would come at a considerable financial and social cost. Four generations of my wife's family have lived in our current home, and we are part of a large network of friends, sports teams, clubs, associations, and community programmes. We have given many years of our lives supporting clubs and organisations, coaching kids' teams, volunteering on committees. Both my wife and I also work in Te Awamutu. All of this would be lost if the incinerator project went ahead and we were forced to relocate for the safety and wellbeing of ourselves and our children. As evidenced by the recent public outcry surrounding this proposal, there are hundreds (or more probably thousands) of families in the community that would feel just as strongly, and many of those will not be so fortunate to be able to move away, and instead will be forced to remain and suffer the consequences, watching their children grow up in an ever increasingly toxic environment.

How does that benefit anyone except the stake-holders of the incinerator? This community could be torn apart, destroyed. This is purely a profit-making exercise, designed to generate income for private opportunists and offshore backers. They may have tried to ice it over with talk of visitor centres, job opportunities, economic value, safety systems, and more, but when you look through this superficial sugar-coating the grim reality of the underlying abomination is impossible to hide.

I urge GCS to look at the environmental, social, and health consequences of this proposal, study the undeniable evidence that has been gathered around the world over the last few decades, and listen to

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the people of Te Awamutu, the very community that they are claiming to “benefit”. The world does not need waste-to-energy incineration, New Zealand does not need waste-to-energy incineration, and the people of Te Awamutu certainly do not need or want it. And to those with the power to make decisions on this project, please consider the inevitable adverse long-term health, environmental, social and economic effects on this community (and New Zealand as a whole), and make the right decision to benefit our children, their children and all future generations, and not to line the pockets of GCS at their expense.

References

1. Ministry for the Environment (2022). *Waste to Energy guide for New Zealand*
<https://environment.govt.nz/assets/Publications/Files/waste-to-energy-guide-for-new-zealand.pdf>
 2. RNZ (2018). *Experts warned govt not to touch waste-toenergy scheme*
<https://www.rnz.co.nz/news/political/354039/experts-warned-govt-not-to-touch-waste-to-energy-scheme>
 3. Stuff.co.nz (2022). *Waste-to-energy plant's new evidence rubbished by experts*
<https://www.stuff.co.nz/environment/300758258/wastetoenergy-plants-new-evidence-rubbished-by-experts>
 4. Minister for Green Skills, Circular Economy and Biodiversity (2022). *Stop, Sort, Burn, Bury - incineration in the waste hierarchy: independent review*
<https://www.gov.scot/publications/stop-sort-burn-bury-independent-review-role-incineration-waste-hierarchy-scotland/>
 5. Stuff.co.nz (2023). *National to fast track offshore wind farm regulations, permits - Luxon*
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 6. The Goldman Environmental Prize (2023). *2016 Goldman Prize Winner, Destiny Watford*
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 7. Sanctuary Mountain (c. 2015). *Sanctuary Mountain Maungatautari*
<https://www.sanctuarymountain.co.nz/home>
 8. NZ Landcare Trust. *TAIEA TE TAI AO, ECOLOGICAL CORRIDOR*
<https://landcare.org.nz/project/maungatautari-to-pirongia-maunga-ecological-corridor/>
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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I seek that the application be declined

I wish (or do not wish) to be heard in support of my submission.



I do wish to be heard in support of my submission
(this means that you will speak at the hearing)

•

I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)



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

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.



I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.



Signature of submitter: _____
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13 October 2023 Contact person: Kevin Buckle
(name and designation, if applicant)

Postal address: 1755 Ohaupo Road, Te Awamutu 3800
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

My submission relates to the whole application

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

This location is not only close to my family's home, in a residential area, but is also close to several education facilities and immediately behind two major premium food factories. As people of Te Tiriti o Waitangi, we have been granted the right to live and function in a healthy environment without being exposed to unnecessary toxins, noise pollution and contamination of our waterways and whenua.

The impacts of this consent being granted could be dire for our valuable and vulnerable people. This incinerator would release emissions including mercury, dioxins and furans, particulate matter, carbon monoxide, nitrogen oxides, acidic gases (i.e., SO_x, HCl), polychlorinated biphenyls (PCBs), and brominated polyaromatic hydrocarbons (PAHS). These are some of the most toxic chemicals known to science. Direct exposure risks the health of workers, residents in nearby communities as well as animals. It would make Te Awamutu a major importer of waste - this is not what we want to be known for and would not draw people TO the town as a tourist attraction.

The location of waste-to-energy incinerators is a critically important aspect in terms of the overall impacts of any particular proposal, this site is located on a flood plain, next to a river, in immediate proximity to residential housing, schools and food production facilities. This land is currently zoned as a Specialised Dairy Industrial Area Policy. The impacts of highly toxic emissions on the production of food products and animals would be dire. In the Netherlands, research conducted indicated that the high dioxin output from waste incinerators could be responsible for contamination of cow's milk and meat. As a result, the production and sales of dairy products from that region was prohibited for several years.

The work of the community and Council on the Maungatautari to Pirongia Ecological Corridor Project would also be negatively impacted by this proposal.

This is being couched as an energy saving approach to waste but with the evidence of previous experiences such as in Waimate – this isn't accurate. 23 Tonnes of toxic ash waste that will need to go into landfill is not energy saving for Te Awamutu.

If we are looking after our people, there is no way this application should be granted.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

To decline the application

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ✓ I do not wish to be heard in support of my submission



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Resource Management Act 1991

(this means that you will not be advised of the date of the hearing and will not speak at the hearing)

- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☐ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

~~I request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: T. Bagley
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 10/10/2/23

Contact person: Tania Bagley
(name and designation, if applicant)

Postal address: 429 Greenhill Drive, Te Awamutu
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I ~~am~~/am not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

My Submission relates to the whole application

My submission is:

Support parts or all of ☐ Oppose parts or all of ☒ are neutral parts or all of ☐
include—

- the reasons for your views.

Air & water & land pollution, Human/animal welfare
& road traffic

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I oppose the whole application & would ask the council
to decline the application

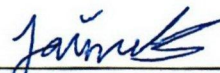
I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 11/10/23 Contact person: Jaime Bayley
(name and designation, if applicant)

Postal address: 1512 Cambridge Road, Te Awamutu
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Jenny Byett
255 Greenhill Drive
Te Awamutu 3800



The reasons for my submission views are:

- The incinerator will produce dioxins that are cancer causing – these will be emitted into the air. There is NO safe level of dioxins. Dioxins build up over time in human fat tissue and in animals. Having already lost a child and my mother to cancer, I am totally against anything that would increase the risk to any person developing cancer.
- There is NO known filtration system to eliminate all toxic products.
- The site is designated a high-risk flood zone.
- I live in very close proximity to the proposed incinerator. Any discharge of ash, toxins, nanoparticles will affect me through the air that I breathe and/or any foods that I eat grown in the soil at my home.
- The applicant, that is Global Contracting Solutions Limited does not have any experience in waste incineration.
- There are no current incinerators in New Zealand. Te Awamutu residents do not want our town to be a testing ground for this technology.
- The Directors of Global Contracting Solutions Limited DO HAVE a track record of violating resource consent conditions.
- There has been no human health assessment provided for the residents of Te Awamutu
- Storm water being discharged into the Mangapiko Stream is likely to be contaminated with heavy metals and dioxins.
- The site is totally unsuitable for an incinerator.
- The location of the incinerator is immediately next to residential housing, schools, early childhood centres and food businesses.
- The application conflicts with the intentions of the Waipa District plan and growth strategy of the community
- The incinerator will be a detrimental contributor to climate change.

- Under New Zealand's air quality standards, it is illegal to burn even one tyre because the health and environmental effects are so toxic, yet this project is proposing to burn 35000 tonnes per year.
- Additional traffic in a residential area will add to air pollution.

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

~~I am/am not~~ ^{I am NOT} a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

The whole application

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

Please see attached

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Decline the application in full

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 11/10/2023

Contact person: _____

(name and designation, if applicant)

Jenny Byett

Postal address: _____

255 Greenhill Drive, Te Awamutu 3800

(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

The whole Application

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ are neutral parts or all of ☐
include—

- the reasons for your views.

PLEASE SEE ATTACHED

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

DECLINE THE APPLICATION IN FULL

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

Attachment to WDC Ref: LU/0323/21

John Byett
255 Greenhill Drive
Te Awamutu 3800



The reasons for my submission views are:

- The company cannot guarantee that there will be NO toxic emissions into the air.
- The incineration process will produce large quantities of toxic water and toxic ash which will have to be disposed of who knows where.
- The process does not burn general household waste but relies on burning huge amounts of tyres which will have to be transported into the area.
- As the furnace is operating 24 hours, 7 days a week they will need to stockpile large quantities of tyres in advance of incineration.
- As the site is adjacent to wetlands, any industrial accident-causing leakage would have disastrous effects which cannot be reversed.
- The number of trucks and trailers feeding the operation would cause a traffic hazard on Racecourse Road as the entrance to the property is right on the corner, thereby creating danger to through traffic.

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 11.10.2023 Contact person: JOHN DESMOND BYETT
(name and designation, if applicant) RETIRED

Postal address: 255 GREENHILL DRIVE TE AWAMUTU 3800
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

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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 one 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.

Privacy information

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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~ am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/am not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

Attached is a letter with my concerns.

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

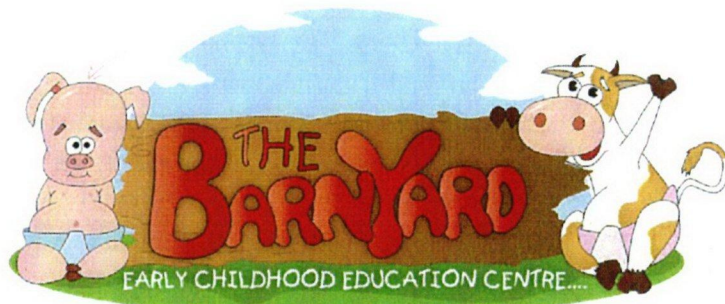
Decline application. - I oppose this application. I want
Waipa District council to decline this application.

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)



The Barnyard Early Childhood Education Centre

504 Racecourse Road
Po Box 351
Te Awamutu
New Zealand

Phone: (07) 870 1515
Email: info@thebarnyard.co.nz

11th October 2023

To Whom it may concern

Firstly I will introduce myself, my name is Michelle Cummings and I am the Managing Director of The Barnyard Early Childhood Centre located at 504 Racecourse Road. I have worked in and owned The Barnyard for 12 years as we take pride in care and education of children ranging from 3 months to 6 years of age. We cater for a wide range of children within our wider community of Te Awamutu. We are licensed for 75 children a day and have a total of 110 families that attend our centre. I have a large amount of parents very concerned with this proposal and the effects this may have on their children being in such close proximity. This in turn could effect the number of families that choose The Barnyard as a place for their Early Childhood Education. Which would be such a shame as the facilities we have are very expansive and we pride ourselves on our natural environment and the amount of outdoor education the children here are receiving.

This proposal will have huge impact on my business as we are within very close proximity to the proposed incinerator. I am unsure where to even start with my concerns and how to put them all into words so here are just a few of my concerns. This by no means covers them all.

As stated before our philosophy is very nature based and we spend 80% of our day in our outdoor environment. If this proposal was to go ahead how would this be safe for our children to be outside in that air for 80% of their day?

The incineration plant is a hazardous facility with serious risks of harm to human health. The plant will emit cancer-causing dioxins and furans, sulphur dioxide, nitrogen oxide, mercury and particulate matter will be released into the air. Dioxins damage the human immune system and cause cancer. Studies have shown direct links to non-Hodgkins lymphoma, increases in risks of miscarriages and pre-term delivery of babies. There are links to reduced male fertility. Exposure to particulate matter impacts those with respiratory problems such as asthma, cardiovascular issues, the elderly and children. There is no human health assessment of this proposal. How does any of this fit in with the amount of education facilities located within 200-500metres of this proposed site? Are you willing to be liable for all of these health issues arising?

“Nurturing a child, growing the future...”

The odour and dust have not been adequately assessed. There is no indication of how often the start up/maintenance will be done and levels exceeded. We have numerous children and staff with asthma and allergies to dusts etc how will this help in me running my business and adhering to my philosophy if we are spending more time inside with no fresh air. One of the Ministry of Education requirements is to have air flow through open doors and windows at all times of the day. Please tell me how I will be able to effectively manage this if the air outside is indeed not fresh and pollution, dust and odours are present.

There will be significant additional traffic in a residential area, adding to air pollution and impacting those who are old, very young and immunocompromised. It will change the nature of the community from a quiet residential street to an unsafe and busy thoroughfare of trucks at all hours of the day and night. Not only does this add to my comments on pollution but brings me to my next point of additional traffic to Racecourse Road. Already this road is a bypass road that has increasing traffic to miss the main street but the addition of 84 movements per hour more of large trucks emitting fumes, possibly lined up along Racecourse Road causing more congestion than already happening. As stated I have 75 children a day attending The Barnyard which means 75 vehicles between 7.30am and 5.30pm coming and going from our driveway. Parents pulling into and out of our driveway is hazardous enough with cars and the normal trucks and tankers that are present on Racecourse Road add 84 more movements a day safety for these children in these cars. Te Awamutu College just up the road I know even driving a car down there at school start time and end time children are driving to school parking both sides of the road and children crossing the road being teenagers often not looking what is coming and just stepping out these 84 more movements of trucks might just take the life of one of those teenagers going to or leaving school. The cars parked either side of the road how would a large truck fit even with a car coming the other way let alone two of the large trucks meeting.

Obviously I have stated the main things that directly effect my business I could go into the effect this would have on the Mangapiko Stream, aquatic life, surrounding farms and animals, flood zones, etc.

Please do not let this proposal go ahead it has many effects for us all as a community, especially the younger generation who I would love to keep attending my Early Childhood Centre.

If you have any further queries, please do not hesitate to contact me.

Yours sincerely,



Michelle Cummings
Centre Owner/Manager

"Nurturing a child, growing the future..."

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)
Barnyard Early Childhood Centre

Date: 11/10/2023

Contact person: Michelle Cummings
(name and designation, if applicant)

Postal address: PO Box 351, Te Awamutu, 3840
(or alternative method of service under section 352 of the Act):

Notes to submitter

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

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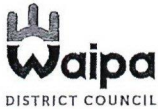
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- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am am not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

as per attached.

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

as per attached

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Reject Total Application.

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☒ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

Burning tires and rubbish can have several adverse effects on human health and the surrounding environment. The dangers of burning tires and rubbish are listed below.

Health risks

The emissions from burning tires and rubbish contain a range of harmful substances, including heavy metals (such as lead, cadmium, and mercury), polycyclic aromatic hydrocarbons (PAHs), dioxins, and furans.

These pollutants are known to be carcinogenic and can have adverse effects on the respiratory, cardiovascular, and reproductive systems. Prolonged exposure to the emissions from tire burning can increase the risk of respiratory diseases, including asthma, bronchitis, and even lung cancer.

Soil and water contamination

The ash generated from burning tires and rubbish can contain toxic substances that can contaminate nearby soil and water bodies. When tire and rubbish ash is deposited onto the ground or carried away by rainwater, it can leach pollutants into the soil and water, potentially affecting ecosystems and posing risks to human health through the food chain and drinking water sources.

Burning tires smell

The smell of burning tires and rubbish is also quite unpleasant. This can upset the surrounding community, decrease property value and damage the reputation of the surrounding area, which also decreases tourism prospects.

Air pollution

Burning tires and rubbish release a significant amount of toxic pollutants into the air. These pollutants include sulphur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), and particulate matter (PM), including fine particles known as PM_{2.5}.

These pollutants can contribute to heavy smog formation, respiratory issues and other negative health effects in nearby communities.

Environmental impact

The release of pollutants from tire and rubbish burning also contributes to environmental degradation and can cause harm to ecosystems. This environmental impact may:

- Damage plant life.

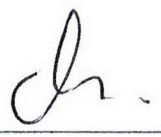
- Affect aquatic organisms.

- Damage surrounding habitats.

- Disrupt the balance of ecosystems.

The pollutants are harmful to all living organisms within close proximity to the burning tires.

I request/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13.10.2023

Contact person: Coralie Barton

(name and designation, if applicant)

Postal address: 533 Frontal Road, Rongotea, Te Awamutu

(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

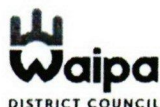
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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one of the following applies to the submission (or part of the submission):

- 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.

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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I **am not*** a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I **am** directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

The adverse effects on the environment and the community.

My submission is:

Oppose parts or all of ✓

include—

- the reasons for your views.

Please refer to attached written submission.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

For the Resource Consent Application to be **DECLINED**.

I do not wish to be heard in support of my submission.

- ☐ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☒ **I do not wish to be heard in support of my submission**
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ Waipa District Council to serve a copy of my submission to the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

WAIPA DISTRICT COUNCIL –

SUBMISSION on WASTE INCINERATION PLANT:

Reference: **WDC REF: LU/0323/21**

Submission Email: submissions@waipadc.govt.nz

'Ref: **LU/0323/21 Te Awamutu Waste Incineration Plant; 401**
Racecourse Road, Te Awamutu'

Applicants Email: richard.falconer@terrargroup.co.nz

Name of Submitter: Derek Boyd

Address of Submitter: 111 Chatsfield Drive, Te Awamutu 3800

Phone: [REDACTED]

Email: [REDACTED]

I **DO NOT** wish to be heard at the Submission Process.

CONCERNS:

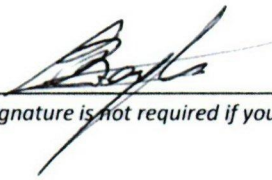
- There is no guarantee or compelling evidence that any filtration system will remove or stop all toxins being released into the atmosphere from the material being incinerated.
- Te Awamutu has no stable power source. Therefore the draw on the limited power supply we have in Te Awamutu, will have a profound effect on the ability of the lines company to power our homes, without it being potentially compromised.
- The plant will not power homes as it suggests the homes will in fact be only powered with what energy can be recovered from the incineration process that was already taken out of the grid and what was already considered available to power the homes in the first place without this monstrosity.
- What impact will this have on the district with toxins, and CO2 emissions, wear and tear on infrastructure, noise, general safety and well-being, to;
 - A nearby Children Centre.
 - A Racecourse.
 - Residences.
 - Schools.

- The amount of water the plant requires, will seriously compromise the districts potable water supply that residents and ratepayers PAY for.
- I am not happy, there is no health report to identify the risks and how these will be mitigated for the wellbeing, health and safety of the district. Especially, when Europe has seen significant problems with livestock being contaminated by the toxins.
- I am not happy that the application has demonstrated that contaminated waste water will be safely removed from site and appropriately disposed of in accordance with the law.

Conclusion

I STRONGLY OBJECT to having a Waste Incineration Plant within the town boundary of Te Awamutu.

I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: Derek Boyd 
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 04/10/2023 Contact person: Derek Boyd
(name and designation, if applicant)

Postal address: 111 Chatsfield Drive, Te Awamutu 3800
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

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- 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.

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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

_____The environmental and health (to people and animals) effects of the burning of waste.

My submission is:

Oppose parts
include—

- the reasons for your views.

___I don't mind if they do sorting of waste but strenuously object to the incineration.

Burning produces cO2 which will further cause global warming. What is the point of me having installed solar panels for green energy if there is a huge incinerator being developed.

___I don't believe that they have the technology to remove all toxic particles and gases from their emissions.

___Landfill is not going to destroy the habitability of the planet, CO2 emissions are going to do that.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

___Not to allow the burning of rubbish on this site.

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☐ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____ Frances Josephine Bowler _____
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: _____ 13.10.2023 _____ Contact person: _____ Frances Josephine Bowler _____
(name and designation, if applicant)

Postal address: _____ 2/330 _____ Park _____ Rd, _____ Te Awamutu _____
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

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- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

ALL OF THE APPLICATION

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

As a resident business, and parent in this community I am not supportive of further introduction of ramp-particles into our immediate environment within such close proximity to residential and schooling. This is not a productive entity to introduce - zero waste measures not lazy, toxic incineration.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

DECLINE APPLICATION

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

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Signature of submitter: 

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 12/10/23

Contact person: Rebecca Brears

(name and designation, if applicant)

Postal address: 193 Turere Lane, Te Awamutu 3800

(or alternative method of service under section 352 of the Act):

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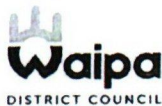
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Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

All of the application

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

not good for environment, causes deaths, bad for the farming community, toxic environment, bad for health, bad for the next generation

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I oppose to this application, I want the waipa district Council to decline this application

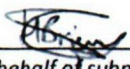
I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
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I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 13/10/23

Contact person: Hayley Brierley
(name and designation, if applicant)

Postal address: 158 Ava Mae Drive, Te Awamutu
(or alternative method of service under section 352 of the Act):

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From: [alastair brickell](#)
To: [info](#)
Cc: [REDACTED]
Subject: External Sender: Submission on Global Contracting Solutions Waipa WTE Plant
Date: Friday, 13 October 2023 11:12:20 pm
Attachments: [Waipa Incineration Submission.docx](#)

CYBER SECURITY WARNING: This email is from an external source - be careful of attachments and links. Please follow the Cybersecurity Policy and report suspicious emails to Servicedesk

I have attached my submission in support of Global Contracting Solutions proposal for a WTE facility at Te Awamutu:

WDC REF: LU/0323/21

1. I wish to be heard in support of my submission.
2. I have forwarded a copy of this submission to the applicant.
3. I am not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
4. I am not directly affected by an effect of the subject matter of the submission that—
 - (a) adversely affects the environment; and
 - (b) does not relate to trade competition or the effects of trade competition.
5. I seek the following decision from the consent authority:
 - Granting of the requested consent by the applicant.

Submission by:

Alastair Brickell

9 School of Mines Lane

Kuaotunu, RD2

Whitianga 3592

NEW ZEALAND

[REDACTED]
www.stargazersbb.com

SUBMISSION ON PROPOSED GLOBAL CONTRACTING SOLUTIONS

WTE FACILITY IN TE AWAMUTU

Alastair Brickell, October 13, 2023

1. Introduction

It is important that the proposed Te Awamutu WTE plant be considered primarily as a medium scale power station rather than just a waste disposal facility. This is especially significant as it produces a very valuable form of electrical energy, one that can be used for increasingly important grid stabilisation as discussed below in section 5.

WTE facilities are especially useful as they turn what is otherwise a problem (eg. plastic waste) into a valuable resource and considerably reduce waste volumes going to landfill. They are increasingly being used in Europe as well as North America and Asia. The UK now incinerates 48% of its municipal waste compared with only 12% a decade ago.

Seven EU countries have WTE plants and as a consequence now landfill less than 3% of their waste. Sweden with a population about twice that of NZ already has 34 such facilities. In many European countries landfill disposal is severely restricted or actually totally forbidden due to toxic leachate problems. It is not inconceivable that similar restrictions could be legislated in NZ in the future.

Electricity consumption is predicted to greatly increase in New Zealand as we move towards electrification of transport and other industries by 2050 so several new power stations will be required. Combusting municipal and construction waste in WTE facilities like the one being proposed mean that we do not have to burn coal or natural gas to generate this electricity.

2. A Useful Analogue - The Bern, Switzerland WTE Facility

In 2018 I toured the modern WTE facility in Europe in Bern, the Swiss capital, where it is located right on the edge of the city. It is very similar in size to the proposed Waipa facility and well illustrates the potential of this method of waste disposal.



FIGURE 1 - VIEW FROM ROOF OF BERN WTE FACILITY LOOKING TOWARDS BERN CITY (BERN CITY FIRESTATION IN MIDDLE FOREGROUND – BLUE BUILDING)

It takes a wider range of material than is apparently currently being proposed for the Waipa facility with virtually no sorting of household waste required and we even observed old couches and styrofoam being unloaded by the public at the site for which they have to pay a disposal charge.

Domestic waste is actually surprisingly high in energy and other valuable materials. A typical 5kg or 35l bag of household waste has the same energy content as 1.5l of oil and can contain 5-20% by weight of metals, much of which can be easily recovered.

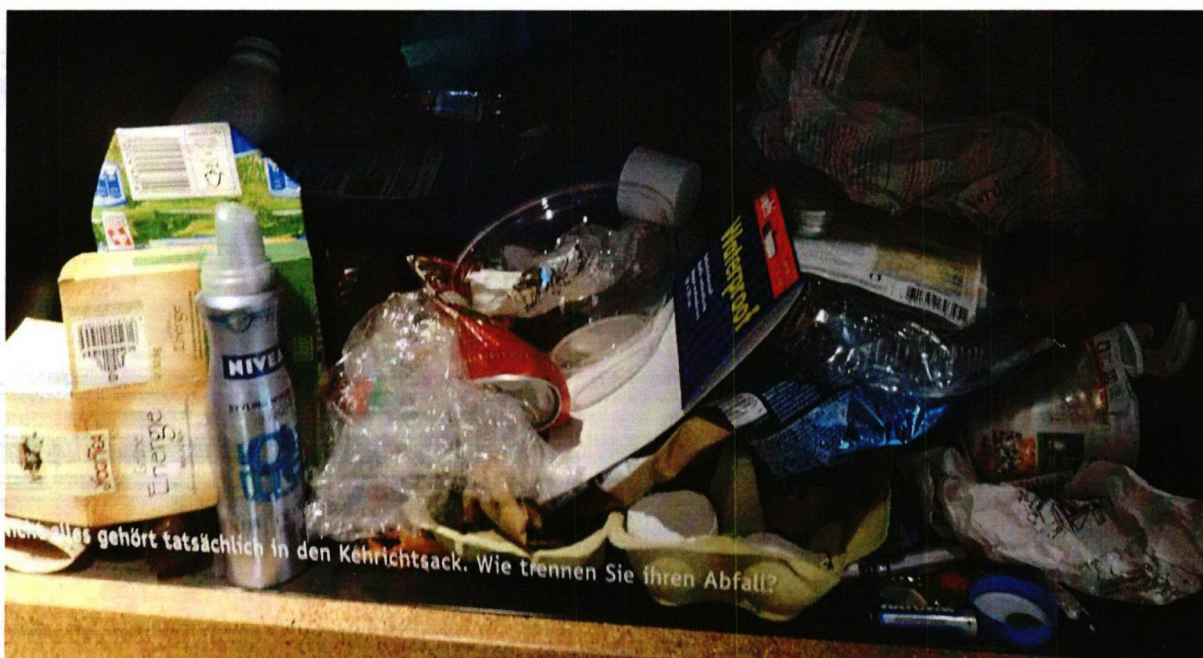


FIGURE 2 - TYPICAL FEED FOR BERN PLANT: NOTE AA BATTERY, ALUMINIUM & STEEL CANS, PLASTIC AND FOOD WASTE, ETC.

This Bern site actually contains two separate incineration plants in the same large building. The one most similar to the proposed Waipa facility mainly takes household and municipal rubbish along with light industrial waste.

This domestic waste plant, which is similar to the proposed GCS one, produces about 16MW of electricity along with waste heat at 175°C which is used in nearby buildings and piped over a 36km network to a range of users around the city. In Te Awamutu it is quite likely that the waste heat could be used by a range of nearby industries (such as the adjacent milk plant or timber drying facilities) or greenhouses could be established in the region to grow out of season, and thus valuable, crops.

The Bern facility also produces as a byproduct in the bottom ash (or clinker) approximately 5 tons of ferrous metals a day (mainly iron and steel) and 5 tons of non-ferrous metals a day (eg. copper, nickel, etc.) which are valuable and can be reclaimed and sold. Small amounts of precious metals such as gold and silver are also recovered, mainly from incinerated e-waste.



FIGURE 3 - FERROUS METAL IN BERN BOTTOM CLINKER FOR RECOVERY

The adjacent facility in Bern just takes forestry slash (which is very well controlled in Switzerland) and wood construction waste as a feedstock and produces an additional 27Mw of electricity. Both plants operate to the highest and most recent European Union environmental air standards and are well within these limits for all pollutants including dioxins. There is also an adjacent 46Mw natural gas power station on the site for periods of high electricity demand.



FIGURE 4 - GISBORNE FORESTRY SLASH – A WASTED ENERGY RESOURCE

Many overseas WTE plants also take sewerage sludge which, being high in organic material, can be combusted to produce energy rather than ending up in landfills.

3. Environmental Issues

Dioxin Concerns

There have been concerns in the past by environmental groups about the level of pollution that WTE plants could produce. The main concern is dioxin but new plant designs have essentially solved this problem as the latest designs ensure the entire combustion stream is maintained at 1000°C to 1200°C which very effectively breaks dioxins down. By using the newest technology Sweden has reduced its countrywide annual dioxin production from 100ppm to just 0.5ppm from all its plants so it is no longer an issue for them and need not be in NZ.

One uncontrolled fire at a rubbish collection point in NZ can easily produce more dioxin than would be produced over the entire lifetime of one of the WTE facilities. These fires often seem to mysteriously occur when there are problems with the disposal of mountains of plastic waste and also car tyre fires occur and can be problematic to extinguish and produce huge volumes of toxic smoke. Such plastic fires have been seen at Kopu collection points near Thames in the past more than once and occur throughout the country.

NZ Herald
March 8, 2019

News A1-23 | World A24-27 | Opinion A28-29 | Classified A30-33 | Entertainment A34-40

AE

It's not a twister, it's toxic

Photo: Alan Gibson

A blaze which sent clouds of toxic black smoke into the air near Thames yesterday was contained by fire crews last night.

The smoke, which had a noxious smell, was generated by piles of burning plastic waste at a recycling plant. Fire crews were still at the Smart Environmental plant four hours after the blaze was first reported.

At its peak, an area 200m by 100m was burning.

Fire and Emergency NZ said no evacuations were needed but

advised residents if they were concerned then they could leave the area.

The firm's managing director, Grahame Christian, told Newstalk ZB that the fire is restricted to plastics outside the building beside State Highway 26.

The plant shares the site with the Carter Holt Harvey mill in Kopu where a fire raged in April last year. FENZ first received phone calls about the blaze at 2.30pm while a police spokesperson said they were notified about the blaze by FENZ at

2.45pm. On arrival, fire crews discovered a number of plastic bales on fire.

De-Ana Wensor said the fire was massive and strong winds in the area were making it swirl into the air "like a twister".

Eve Gibson, near Matatoki, said the sky near the fire was filled with smoke. "It's just masses and masses of black smoke pouring out" she said. "The smell is just unbelievable."

St John spokeswoman Beverley Tse said they were assisting FENZ at the scene.

FIGURE 5 - MYSTERIOUS PLASTIC RUBBISH FIRES NEAR THAMES

Odour Concerns

In properly designed facilities dust, odours and smoke are not a problem as the plant I visited in Bern shows. On the roof where the chimney vents are located there is no smell, no dust and no smoke; just shimmering heat as can be seen in the image below on a somewhat cloudy day. Figure 1 shows the rooftop low temperature heat recovery process so virtually no steam is released from the chimney stack.



**FIGURE 6 - BERN WTE PLANT CHIMNEY STACK: - NO SMOKE, NO SMELL;
JUST HEAT**

Greenhouse Gas Concerns

The proposed facility, in common with all steam generating power stations, will inevitably produce some greenhouse gases, notably water vapour as steam and CO₂. However, it should be noted that much of the feedstock such as wood, food, plastic and possibly sewerage sludge would contribute considerably more CO₂ and CH₄ (methane) into the atmosphere if deposited in a landfill where it can oxidise over time. While larger landfills can recover some of this CH₄, typically only about 68%, some facilities in New Zealand recover none at all. Several studies estimate that methane is up to 28 times more potent as a greenhouse gas than CO₂. Unlike conventional leaky landfills a WTE plant can combust 100% of the methane in the waste and produces only a small amount of the much less harmful CO₂ in the process. This provides a net greenhouse benefit as the more potent methane is prevented from getting into the atmosphere and the electricity produced is just a bonus.

Transport Concerns

Conventional landfills already involve road transport of waste, often over large distances. It is possible that due to the scale of the Waipa plant and the adjacent rail siding that some of the feedstock could involve rail transport for much of its journey in the future (eg. from Auckland) which is much more efficient than road transport. This could also help to reduce the truck traffic on nearby roads.

Compatibility With Existing Recycling Schem Concerns

While some overseas WTE facilities take virtually all household waste including small batteries (Fig. 2) there is no reason why the Waipa facility should interrupt the existing or future recycling schemes in NZ. It will compliment the current and planned recycling operations and it is likely that the mix of plastic or other waste it consumes will change as recycling technology changes. It provides one more option for councils deciding what to do with their locally generated waste.

Already soft plastic (eg. milkbottles) is being used to produce black fence posts in a unique NZ process. While this seems on the surface to be a final solution it is really only delaying the disposal problem. Recycled plastic fence posts on farms or orchards will eventually break down, despite being UV stabilised. The stumps may well be left in the ground thus just transferring waste from our cities to the NZ farmland which is not a particularly good solution. Although the recovered posts or parts of posts could perhaps be recycled once or twice again, eventually they will have to be disposed of. So this 'solution' is not actually a solution, it just delays eventual disposal. However, with a WTE facility, especially one in a rural area like Te Awamutu, these end of life posts could eventually become a valuable and easily handled high energy feedstock thus finally providing a real solution and useful energy.

Feedstock Supply Concerns

Concern has been expressed by some that there might not be sufficient waste to continuously feed the Waipa facility in the future. At least one WTE plants in Sweden imports waste from the UK and there is no reason why NZ could not take waste from Australia with Sydney being a suitable source. We already import fuel (overseas coal) to fire the Huntly power station so importing fuel is not new to NZ. The adjacent railway line to the proposed plant could enable this in the future. However, if domestic waste quantities decrease it is likely

that the percentage of used tyres or other waste in the mix could be increased in the future to take up any shortfall.

4. Facility Will Consume Used Tyres

A significant feature of the proposed WTE plant is that it plans to use discarded vehicle tyres for 20% of its feed. Anyone travelling in the NZ countryside will have seen piles of these lying around on farms and industrial areas. Disposal of these items is a huge environmental problem that is rarely addressed in NZ or overseas.

New research efforts are only just beginning to reveal the impact of near-invisible tire dust. A recent report from the *Pew Charitable Trust* found that 78 percent of ocean microplastics are from synthetic tire rubber. These toxic particles often end up ingested by marine animals, where they can cause neurological effects, behavioural changes, and abnormal growth.

Scientists eventually identified a chemical called 6PPD, typically used in tire manufacturing to slow cracking and degradation. When exposed to ozone in the atmosphere, the chemical transforms into multiple other species, including 6PPD-quinone—which was found to be highly toxic to multiple fish, including coho salmon in the US. The same chemical has since been detected in human urine, though any potential health impacts remain unknown. While the vast majority of this material will come from tyre rubber washing off our roads some will come from uncontrolled combustion and also weathering of old tyres in tyre dumps.

In NZ we produce about 5 million used tyres each year. Some are used in cement manufacture and others sent overseas for ‘recycling’, often being turned into artificial grass or turf. However, this eventually breaks down and can easily lead to 6PPD ending up in the oceans.

Many NZ tyres remain on farms and in waterways and industrial sites throughout the country. Here they slowly oxidise releasing CO₂ and other gases into the atmosphere and rubber particles into our waterways. From time to time they get burnt or spontaneously combust in suspicious circumstances producing huge amounts of toxic smoke.

Figure 7 of a tyre dump fire in Kuwait illustrates the hazard these tyre dumps can pose. Huge amounts of thick toxic smoke are released to the environment with a great deal of heat generated. However, proper combusting one kilogram of used tyre can produce more than 10x the energy in a similar mass of coal and this fact can make them a very useful addition to the waste stream for a WTE facility. The heat can be recovered to produce electricity rather than being wasted to the environment and causing air pollution.



FIGURE 7 - KUWAIT TYRE DUMP FIRE

Figure 8 shows residue from a small tyre fire on a farm in Northland in 2022 but there have been much bigger tyre fires in NZ in the past.

The 12% steel reinforcing in the tyres remains virtually intact, just as it would in a WTE facility, with the major difference being that in the WTE facility it can be recovered and recycled and actually is a valuable byproduct that can produce an income stream for the facility.



FIGURE 8 - STEEL REINFORCING BELT WASTE AFTER NORTHLAND 2022 TYRE FIRE

5. Valuable Form of Electricity Produced

The electricity produced by the proposed plant would be in the order of 15 MW, while not huge in overseas terms, is not inconsiderable in the NZ electricity scene. It is especially valuable electricity as it will be produced 24/7 365 days a year regardless of whether or not the sun is shining or the wind is blowing or the dams are full. It will also be considerable quieter and occupy much less land than a similarly productive wind turbine facility. With an expected life of about 60 years the Te Awamutu plant will last at least twice as long as the wind or solar farms which will require partial or complete replacement and disposal twice during this period. Recycling of wind turbine blades and solar panels is already a big environmental problem overseas.

An often overlooked feature is that the WTE energy will be produced in a system with high rotating mass inertia in the steam turbine. This inertia is critical for ensuring national grid frequency stability which wind and solar power generators have great difficulty providing. Lack of frequency stability in a national grid can have very serious consequences for consumers, especially industrial ones.

This will become even more important as wind and solar supplies increasingly penetrate the national grid in future years. In addition baseload generators are essential to provide start up capability and synchronisation to the grid in the event of partial or complete grid collapse due to potential earthquakes or volcanic eruptions. The 1995-6 eruptions of Mt. Ruapehu and its effects on hydro generation showed just how vulnerable our national grid and dams can be to these events, largely as a result of the ash produced. As a geologist I am concerned that these events will certainly continue in the future with Taupo, Taranaki and the Rotorua and Ruapehu areas being of particular concern.

6. Possible Tourism Benefits

While these facilities can be large structures there is no need for them to be ugly. The late visionary architect Friedensreich Hundertwasser was a great fan of incineration plants and designed several large ones. He died in New Zealand and his legacy includes the Kawakawa toilets and now the new Whangarei Hundertwasser Centre which recognises his accomplishments. A Hundertwasser designed WTE plant in Waipa could be a great compliment to these structures and a tourist attraction in its own right as part of a national Hundertwasser trail. I am not aware if GCS has considered this in their planning but perhaps they might. Te Awamutu is already on the tourist trail with its unique Space Centre and a Hundertwasser style building could well bring in more tourists, even international ones.

Overseas these facilities are well accepted by their communities with one in Japan (Fig. 9) having its own creche and café and is popular with tourists with another in Copenhagen having been designed with a towering roof that has been constructed to become a year round ski slope.

The illustrations below are obviously of much larger WTE facilities overseas but even a scaled down version of these could be a local Hundertwasser landmark. Perhaps regional tourism operators or even councils could assist with costs involved in altering the design to make it truly unique.



FIGURE 9 - HUNDERTWASSER DESIGN WTE PLANT – OSAKA,
JAPAN

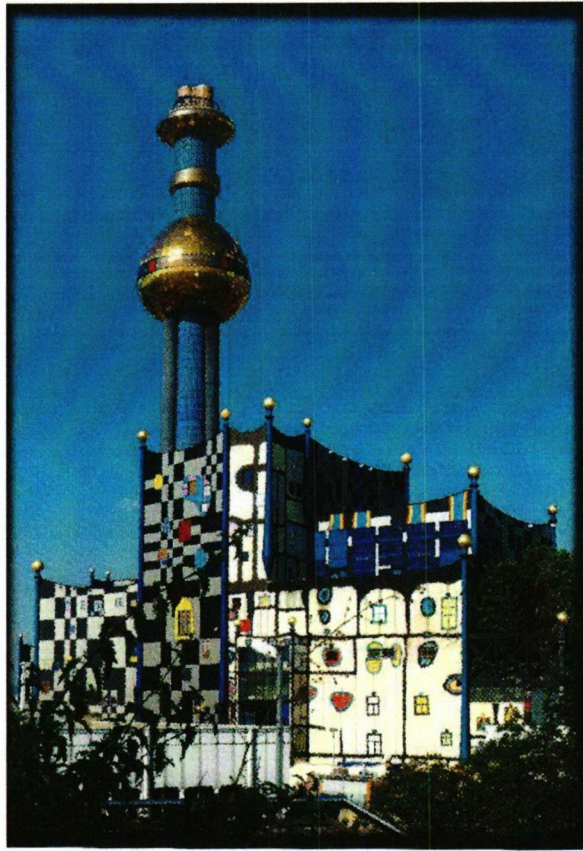


FIGURE 10 - HUNDERTWASSER DESIGN WTE PLANT - VIENNA,
AUSTRIA

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I ~~am~~/am not directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

My submission relates to the whole application.

My submission is:

Support parts or all of ☐ **Oppose** parts or all of ☒ **are neutral** parts or all of ☐
include—

- the reasons for your views.

The example of Raglan Xtreme Zero Waste is a sustainable model which can easily be introduced in Te Awamutu. With such waste minimisation Te Awamutu will not generate enough material to operate an incinerator, thereby necessitating the importation of waste from other regions. This is not an attractive scenario.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I want the Waipā District Council to decline this application.

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☒ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

I ~~request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: 
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 8 Oct 2023 Contact person: Deidre Harte Barry
(name and designation, if applicant)

Postal address: 183 Kakaramea Road, RD6, Te Awamutu 3876
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one of the following applies to the submission (or part of the submission):

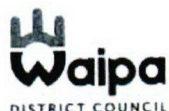
- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.

Submission on a Notified Resource Consent Application

Form 13



Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

MY SUBMISSION RELATES TO THE WHOLE APPLICATION.

My submission is:

Support parts or all of ☐ Oppose parts or all of ☒ are neutral parts or all of ☐
include—

- the reasons for your views.

SEE OTHER PAGES FOR SUBMISSION LETTER.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

I WANT THE WAIPA DISTRICT COUNCIL TO DECLINE THIS APPLICATION.

I wish (or do not wish) to be heard in support of my submission.

- ☒ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☐ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☒ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(6) (b) of the Resource Management Act 1991)

Dear Sir/Madame,

This submission is in reference to:
WDC REF: LU/0323/21

I'm Carla and I live with my partner at 361 Racecourse Road, we are going to be directly affected by this application as our backyard will be directly in view of this abomination and we have one house in between us and the road that all the trucks will go down. I have lived here for 4 years after moving over from the UK, and have found myself very at home here, so much so that I have become a permanent resident, and we want to start a family. But sadly, we will be moving out of the area should this go ahead, as I imagine the same will go for a lot of people because no one is going to want to live in an area with a waste incinerator pumping out deadly toxins into our air.

I cannot begin to describe the utter shock I feel that we are even at this point and us, citizens of your district (who you have a duty of care to), are having to oppose a waste burning incinerator, and so close to a growing town, that should never have seen the light of day to begin with. Isn't New Zealand better than that? Don't we class ourselves as pioneers of sustainability and being green? The addition of non-renewable energy from waste works against efforts to decarbonise the energy sector.

I, and many people in the town, have great concerns about this proposal and think that the Waipa district council should decline this application for many reasons.

There is no assessment of land contamination included in the application. International research shows that the land surrounding incinerators can be extensively contaminated with heavy metals, microplastics and other toxic emissions including dioxin. What about all the livestock in the area, not to mention the dairy factory right next to this site? How is it ok to burn waste right next to a factory that produces food that people consume? In the Netherlands, research indicated that the high dioxin output from waste incinerators could be responsible for contamination of cow's milk and meat. As a result, the production and sales of dairy products was prohibited for several years. Can you imagine the impacts on the NZ dairy economy should it become contaminated?

This location is directly adjacent to residential housing, a daycare, and a college. I assure you; this will change the landscape of Te Awamutu (and not for the better) should this go ahead. I'm sure would negatively impact the Waipā District Plan and Growth Strategy for the community. One of the main draws to this house when my partner bought it was the feel that it was close to town but also felt a little rural as we have so much space and the fields around us. The proposed building will overpower the current landscape and make it feel as though we are living in an industrial zone.

The entire site is a floodplain - most of the site is designated a High-Risk Flood Zone. We have seen this firsthand from our back yard, there have been constant flooded areas in this location due to all the torrential rain (caused by global warming).

Allowing rivers the ability to spread to accommodate severe rainfall events in future protects infrastructure, business and housing from inundation. The new incinerator buildings would increase flooding spread to the Fonterra factory and houses on Factory Road, numbers 331-467. The company also proposes to build its building lower than existing requirements (because it will cost them a lot more money to build to the required levels). This will mean even greater risk to the community. Insurance companies are warning New Zealanders not to build on floodplains due to climate change. The incinerator may become uninsurable, and the community would be left with the cleanup bill.

This business will bring a lot (over 200 per day) of heavy-duty vehicles down our road. We already have a decent amount which causes our house to shake. We do not want this to be happening more! What about the state of the roads too? Who must pay for the roads to be constantly re-done because all the trucks have bugged it up, us as rate payers, that's who? What happens if the incinerator was to break and get backed up, where does the queue of trucks go then? Block the road to our homes. And it will significantly increase the air pollution from all these extra vehicles in our community.

I shouldn't even need to speak to the climate impacts of a waste incinerator. But here we are...

The incinerator will use non-renewable feedstock (plastic waste, tyres, mixed solid waste & flock) to create energy: this is equivalent to a fossil fuel production plant, but much dirtier and riskier because of the different composition of the materials.

The incinerator will directly add about 150 kilo tons per year of CO₂, causing a huge effect to climate change. The facility would have a carbon footprint many times greater than the same amount of waste being sent to landfill. Why are we not working towards a more circular economy here? The inclusion of 35,058 tonnes of plastic (as well as a considerable portion that includes plastic) does not align with the recently released National Plastics Action Plan for Aotearoa New Zealand by the Ministry for the Environment.

The Waipā District Council has a great waste minimisation plan and opportunities for more comprehensive zero waste strategies that would fit with the goals of minimise wastes, while meeting community aspirations for a healthy environment, job creation and mitigation of climate emissions. Investing hundreds of millions of dollars into an incinerator, locks in the need for continued production of waste, meaning the community misses out on other waste uses further up the waste hierarchy (like reuse, repair, and repurposing).

By building an incinerator in our community, you are advertising to the world that we were not clever enough politically or technically to recover our discarded resources.

Te Awamutu will need to import almost all of the material for this facility from outside of the district. This is not a proposal for the benefit of the community. The company has no contracts for the delivery of the feedstock except from its own operations (as Global Contracting Solutions limited). This means it is impossible to know what hazards, risks and emissions exist because only a small percentage of the feedstock is known. It also means that the company is more likely to burn recyclable materials and other things because it must always continue to operate. It will directly work against efforts to minimize waste. Incineration does not replace the need for landfills - instead it takes ordinary materials and concentrates them into more toxic ash.

The incinerator would produce 23 tonnes/day of toxic ash which has to be landfilled. Incinerator ash contains heavy metals, microplastics, deadly nanoparticles and dioxins. The bad elements that are released through incineration cannot be destroyed so they will just be falling onto our town and into our soil/water. In the Netherlands, chicken eggs that live in close proximity of a waste incinerator, have been found to contain dioxins. We have chickens, so if this incinerator was to go ahead, we wouldn't be able to eat their eggs anymore as they would become poisonous.

The storage of highly contaminated wastewater and other hazardous substances on site risks spills and wider contamination throughout NZ.

There is no risk assessment of the possibility of fire or explosion despite the storage of hazardous materials and highly flammable feedstock. The community only has a volunteer fire brigade, and what about its proximity to residents and schools?! GCSL have never dealt with an incinerator before, never built one. There is no way you could trust someone with zero experience in this area to do a good enough (or safe) job.

I come to maybe the worst part of all. There is no human health assessment of this proposal!?

The incineration plant is a hazardous facility with serious risks of harm to human health. The plant will emit cancer-causing dioxins and furans, Sulphur dioxide, nitrogen oxide, mercury and particulate matter will be released into the air.

Dioxins damage the human immune system and cause cancer. Studies have shown direct links to non-Hodgkins lymphoma, increases in risks of miscarriages and pre-term delivery of babies. There are links to reduced male fertility. Exposure to particulate matter impacts those with respiratory problems such as asthma, cardiovascular issues, the elderly and children. As previously mentioned, we want a family, and we will not allow that to happen next to a waste incinerator. What kind of person wants that for their children?

Under NZ's air quality standards, it is illegal to burn even one tyre because the health and environmental effects are so toxic - yet this project is proposing to burn 35,000 tonnes a year?! Burning tyres emits cyanide, carbon monoxide, sulfur dioxide, and products of butadiene and styrene. And the smell of those tyres burning will fill the community with an unbelievable stench. The odour and dust have not been adequately assessed. There is no indication of how often the startup/maintenance will be done and levels exceeded. 1 startup or upset condition within the facility can emit a whole year's worth of dioxins in a matter of minutes!

It will change the nature of where we live from a quiet residential street to an unsafe and busy thoroughfare of trucks with huge industrial chimneys in our garden view. This country hasn't got regulations for this type of waste management, and this should never be approved to go ahead. We need to be focused on providing a more circular economy for our future, there has to be a better way.

I implore you to see common sense here and not allow this proposal anymore time. It's already had way more than it should.

A resident,

Carla Bell

~~I request~~/do not request*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: CBell
(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 08/10/23 Contact person: CARUA BEU
(name and designation, if applicant)

Postal address: 361 RACECOURSE ROAD, TE AWAMUTU, 3800
(or alternative method of service under section 352 of the Act):

Notes to 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.

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.

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

If you make your submission in hard copy please deliver to Waipa District Council, 101 Bank Street, Te Awamutu or 23 Wilson Street, Cambridge or post to Private Bag 2402, Te Awamutu 3840

If you make your submission by electronic means, a signature is not required. Electronic submissions on resource consent applications must be directed to submissions@waipadc.govt.nz.

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 one 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.

Privacy information

The information you have provided on this form is required so that your submission can be processed under the RMA. The information will be stored on a public register and held by the Council, and may also be made available to the public on the Council's website. In addition, any on-going communications between you and Council will be held at Council's offices and may also be accessed upon request by a third party. Access to this information is administered in accordance with the Local Government Official Information and Meetings Act 1987 and the Privacy Act 1993. If you have any concerns about this, please discuss with a Council Planner prior to lodging your submission.



Submission on a Notified Resource Consent Application

Form 13

Sections 41D, 95A, 95B, 95C, 96, 127(3) and 234(4),
Resource Management Act 1991

This is a submission on:

APPLICANT'S NAME: Global Contracting Solutions Limited

LOCATION: 401 Racecourse Road, Te Awamutu

I ~~am~~/am not* a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

I ~~am~~/am ~~not~~ directly affected by an effect of the subject matter of the submission that—

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

The specific parts of the application that my submission relates to are:

I oppose the application in its entirety

My submission is:

Support parts or all of ☐ Oppose parts or all of ☒ are neutral parts or all of ☐

Include—

the reasons for your views.

After watching the meeting (online) of the Te Awamutu Kihikahi Community Board (27/9/2023) & hearing the different points of view presented by 3 speakers (Prof Cornett, Roger Watson, Sue Coulters) I am convinced this project should not be approved. I found the details presented by Mr Watson, unconvincing.

I seek the following decision from the consent authority:

give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

My submission relates to the whole application. I strongly oppose this application and request WDC decline it

I wish (or do not wish) to be heard in support of my submission.

- ☐ I do wish to be heard in support of my submission
(this means that you will speak at the hearing)
- ☒ I do not wish to be heard in support of my submission
(this means that you will not be advised of the date of the hearing and will not speak at the hearing)
- ☐ If others make a similar submission I will consider presenting a joint case with them at the hearing.

You must tick one of the boxes above, otherwise it will be deemed that you do not wish to be heard and we will not advise you of the date of the hearing.

- ☒ I have served a copy of my submission on the applicant.
(this is required by section 96(5) (b) of the Resource Management Act 1991)

I request/~~do not request~~*, pursuant to section 100A of the Act, that you delegate your functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the local authority.

Signature of submitter: _____

(or person authorised to sign on behalf of submitter) (A signature is not required if you make your submission by electronic means.)

Date: 9/10/2023

Contact person: Dianne S Burgess

(name and designation, if applicant)

Postal address: 2/262 Bank Street, Te Awamutu 3800

(or alternative method of service under section 352 of the Act)

Notes to submitter

If you are making a submission to the Environmental Protection Authority, you should use form 160.

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.

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Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least one 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.

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