

Environmental Scoping Study

**AFFCO Meats/Land
Meats New Zealand Ltd
Wairoa Plant**

Environmental Scoping Study

AFFCO New Zealand Ltd, Wairoa

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1 Summary

The purpose of this scoping report is to describe the current situation with regard to the environmental effects of the AFFCO New Zealand Ltd, Wairoa (AFFCO Wairoa) activity. This includes the identification of the resource consents currently held by AFFCO Wairoa, the level of compliance with those consents based on monitoring data, and any other effects on the North Clyde environment that may be occurring as a result of activities on-site and if these are being adequately addressed. This scoping report will then inform the wider North Clyde Strategy that is being prepared concurrently.

From a review of on-site activities, AFFCO Wairoa achieves general compliance with relevant District and Regional planning requirements. All discharge and water takes are subject to regional consents from Hawke's Bay Regional Council, and as such are subject to comprehensive consent conditions and regular monitoring requirements to ensure compliance.

The operation is subject to regular scrutiny (in addition to environmental regulations, AFFCO are also regularly audited by the USDA and EU, and are ISO 9002 certified and HACCP approved by the Ministry of Primary Industries). Over time, AFFCO Wairoa has progressively implemented (and continues to implement) measures in an attempt to respond to and address any significant adverse effects of its activities on the natural environment and on neighbouring residents.

Key recommendations for AFFCO Wairoa are:

- 1) To continue to achieve compliance with its regional consents.
- 2) To continue to identify opportunities, and implement technological and site management improvements, that result in on-going improvements in overall environmental performance.
- 3) To participate in any community advisory group that may be established to facilitate positive relationship building between local businesses and the residents of North Clyde.

2 Scoping Report Methodology

This scoping report has been developed using information obtained from a site visit held on the 29th January 2013 accompanied by the Plant Manager – Dean Tucker, data sourced from both Wairoa District Council and Hawke's Bay Regional Council, a broad desktop assessment, and input from Wairoa District Council's Environmental Health Officer.

It is important to note that although this report has sought to provide an accurate representation of the operation's activities, it is not a comprehensive environmental impact assessment. *Of particular note, AFFCO Wairoa discharges to the River were purposely excluded from this scoping exercise, as these are predominantly of ecological and water quality importance, and of less relevance in terms of impacts on neighbouring amenity (the latter being the primary focus of the overall strategy for 'North Clyde').*

3 Site Description

3.1 Business Details

AFFCO is the supplier of premium meat products (including chilled and frozen beef, lamb, mutton, goat and pork cuts) to the New Zealand domestic market and to more than 70 countries internationally. There are 9 AFFCO operations located around New Zealand with one being located in the Industrial Zone in Wairoa. The Wairoa site was incorporated into AFFCO's operation in 1990, following the purchase of the North Island assets of Waitaki International. The site is considered to be strategically located between Napier and Gisborne giving a large land base from which to draw livestock for slaughter. It is one of the largest plants in New Zealand. The current Plant Manager is Dean Tucker.

AFFCO undertake slaughter and processing techniques to comply with cultural needs, such as Halal processing and are regularly audited by the USDA and EU. AFFCO Wairoa operate under a Risk Management Program approved by the Ministry of Primary Industries.

The AFFCO Wairoa operation is located on the northern fringe of North Clyde, and borders a largely residential area to the south and local recreation grounds (War Memorial Park), with rural land use surrounding the other boundaries of the site. A short distance north of the site, on State Highway 2, lies 'Taihoa Marae'.

The site is accessed from both Hunter Brown Street to the south and State Highway 2 to the north. The site also abuts the Wairoa River on the river's northern banks, with an intervening strip of esplanade reserve following the bank edge.

According to Dean Tucker (Plant Manager), AFFCO Wairoa employs over 600 workers (some of whom live in North Clyde) with the plant operating 10-11 months of the year. During peak times, the plant operates on 2 shifts, 5 or 6 days per week.

3.2 Site Details

Physical address: Hunter Brown Street, Wairoa

Site area: 21.1446 ha

Legal description: Part Lot 2 DP3286, Lot 1 DP13699, Lot 2 DP13699, Lot 1 DP 3827, Lot 2 DP3183 and Lot 1 DP3435.

Additional lots referred to in resource consents:

Lot1 DP13699, Lot 11 DP12092, Lot 80 DP1584, Lot 1 DP 3901, , Secs 10R,11R,12R Blk 2, Lot 2 DP3183, Lot 2 DP16841, Lot 1 DP3435 Clyde SD, PT Lot 2 DP3286, PT Lot 2 DP3286, Lot 1 DP3901, Survey District (SO4313), Sec 11R Blk 2 Clyde Survey District (SO 4313), Sec 12R Blk 2 Clyde Survey District (SO4313), Sec 15 Blk 2 Clyde Survey District (SO4313).

3.3 Applicable District and Regional Plans

The following section outlines the applicable district and regional plans and the specific sections of each plan that apply to the AFFCO Wairoa site. A detailed assessment of the AFFCO Wairoa site against the relevant sections of each plan are discussed further in section 7.1 below.

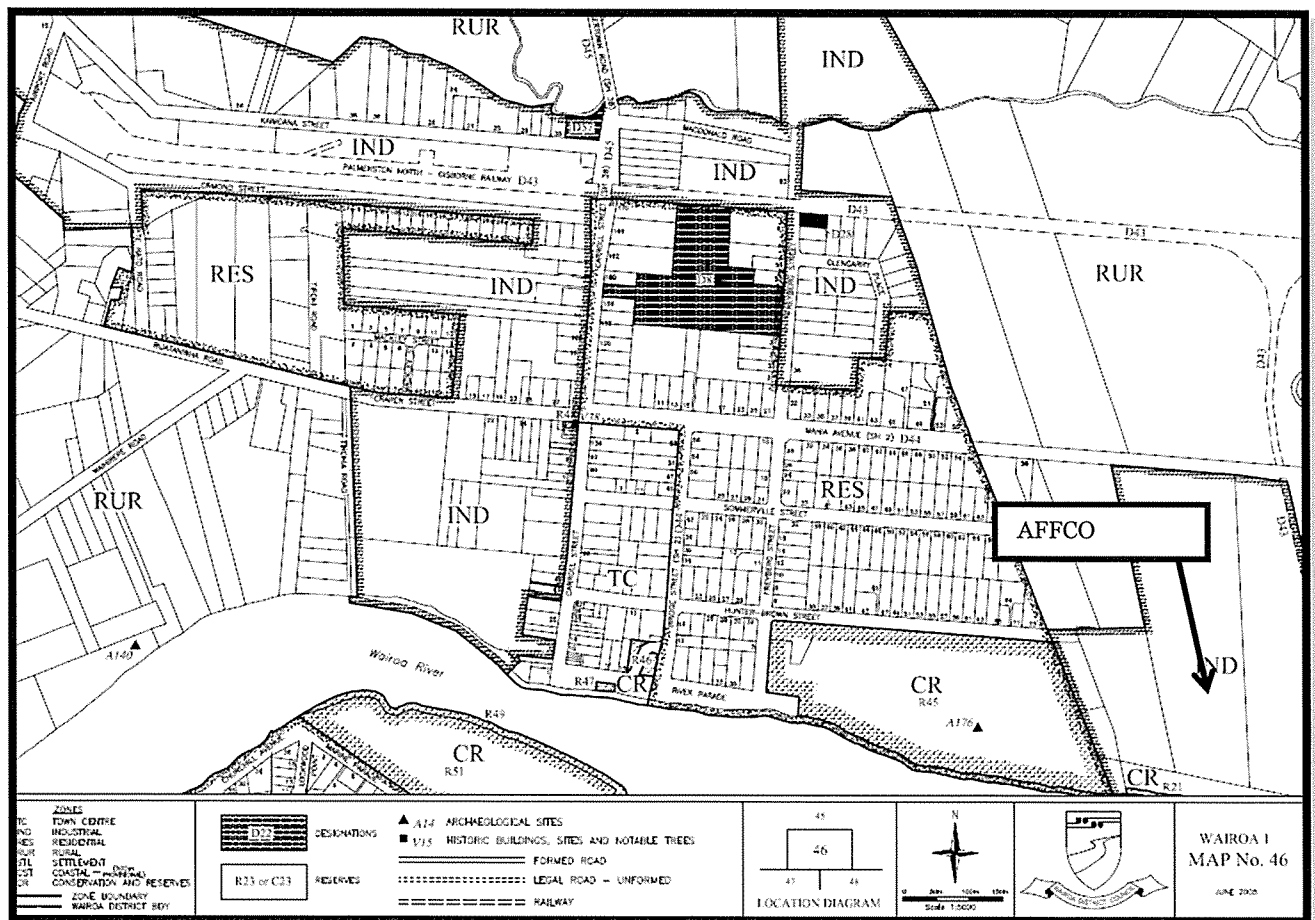
3.3.1 Wairoa District Plan

The AFFCO Wairoa yard is located entirely within the Industrial Zone in the Wairoa District Plan, and adjoins areas of residential, rural and conservation/reserve zoned land – see planning map Figure 1 below.

The objectives and policies of the Industrial Zone aim to provide for the establishment of industry in this area, whilst avoiding, remedying or mitigating adverse effects on the environment and on the amenity values of surrounding areas (particularly where sites adjoin the Residential Zone).

The District Plan provides for any activity to locate in the Industrial Zone provided it can meet the Industrial Zone performance standards for permitted activities.

Permitted activity performance standards in the Industrial Zone include noise limits, odour & glare standards, building setbacks, parking and loading requirements, signage limits, hazardous substance thresholds, building freeboard requirements in flood prone areas, and earthworks limits.



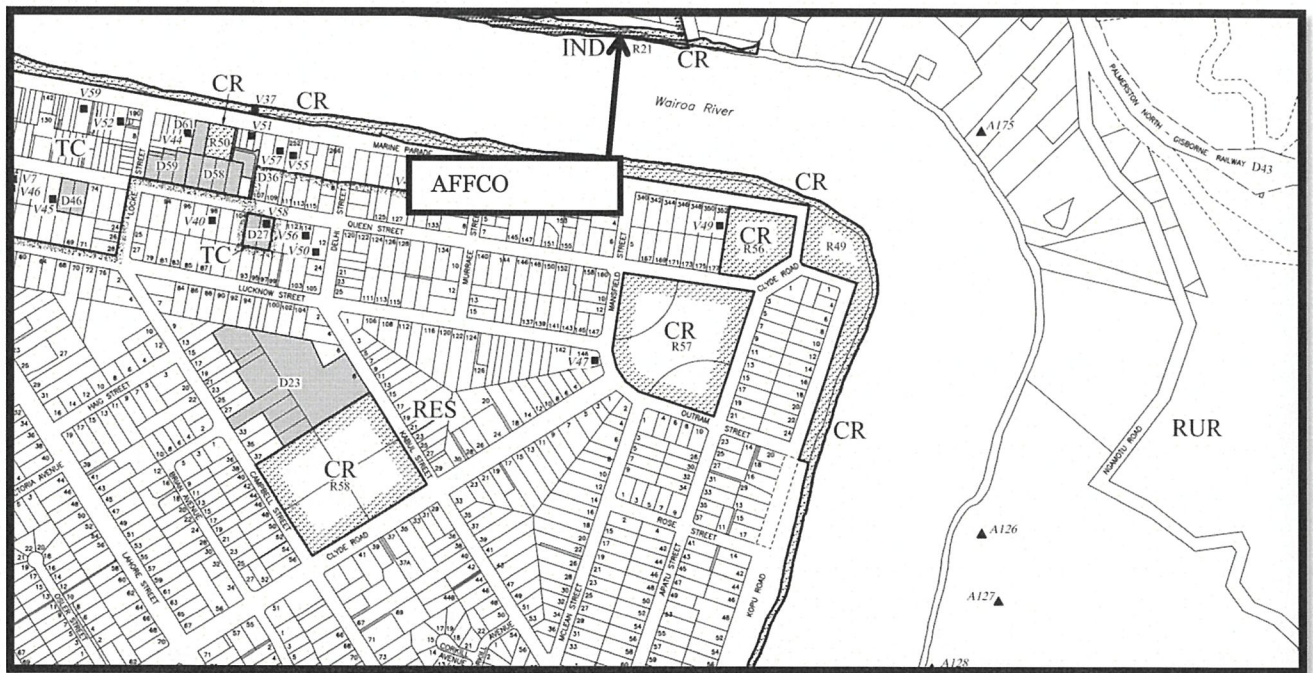


Figure 1 & 2 – location of AFFCO on Wairoa District Council Planning Maps

3.3.2 Hawke's Bay Regional Resource Management Plan (RRMP)

The Hawke's Bay Regional Resource Management Plan applies to the AFFCO Wairoa site. This Plan addresses matters such as odour, dust, and discharges to land and water and the way in which AFFCO Wairoa need to manage their site in relation to these matters.

AFFCO Wairoa has the appropriate number of resource consents with Hawke's Bay Regional Council from the operation of the company's meat processing operation, including the following processes:

- *Products of combustion from a 15 MW coal fired boiler*
- *Fellmongery*
- *Effluent treatment plant*
- *Rendering plant*
- *General associated operations to those above'.*

These regional consents address:

1. Discharges of contaminants into the air;
2. Discharges of contaminants to water; and
3. Water take to supply non-potable water.

In terms of 'amenity'-related issues, the regional consent of particular interest is the discharge of contaminants into the air, as odour is the most significant regional matter in relation to the amenity of neighbouring properties. Discharges to water and the water take (although high in terms of ecological significance) are less significant in terms of direct impacts on the amenity of surrounding residential areas. Refer to Appendix 2 for a copy of the discharge to air and water take consents and section 7.2 for further detail regarding these consents.

4 Current Activities/Operations On-Site

4.1 Site Plan & Operations

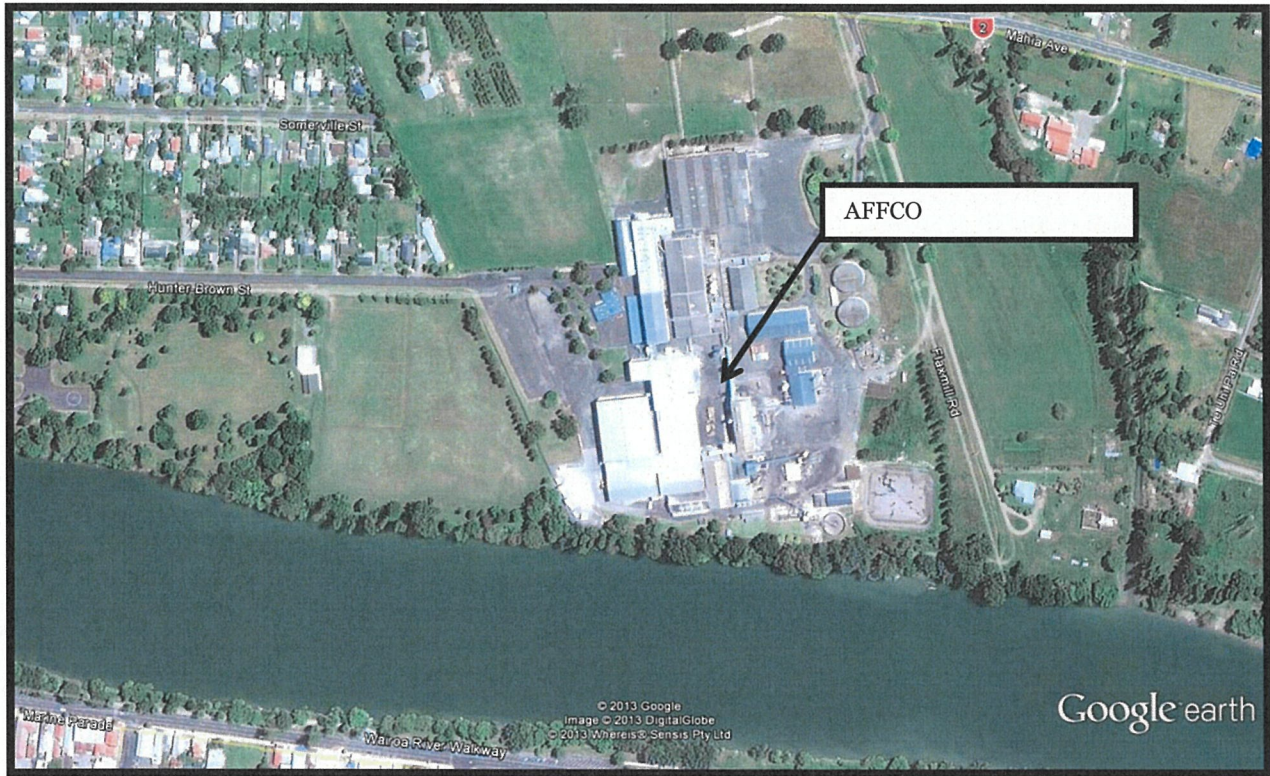


Figure 2: AFFCO Site

As can be seen from Figure 2 above, there are a large number of buildings located on the site with the main buildings comprising of (refer also photographs over page, and the site plan in Figure 3):

- Coal fired boiler;
- Onsite waste water treatment with effluent pond;
- Wool store;
- Covered sheep & Beef yards;
- Fellmongery and rendering shed;
- Coolstore, chillers and freezers;
- Sheep & Lamb Slaughter & Cutting;
- Beef Slaughter & Boning;
- Administration office and amenities; and
- Palleting and stores areas.

The site has two entry points; one entry point from Flaxmill Road off State Highway 2 and one entry point from Hunter Brown Street. From the Flaxmill Road access, stock trucks can directly access the stock yards and holding paddocks at the rear of the site for delivery of livestock. The Hunter Brown Street entrance services the main staff car parking area, and the loading areas for transportation of processed meat to market.



Photograph 1: View of meat products loading area.



Photograph 2: Onsite wastewater treatment with effluent pond.



Photograph 3: View of covered sheep/goat yards



Photograph 4: View of cattle yards.

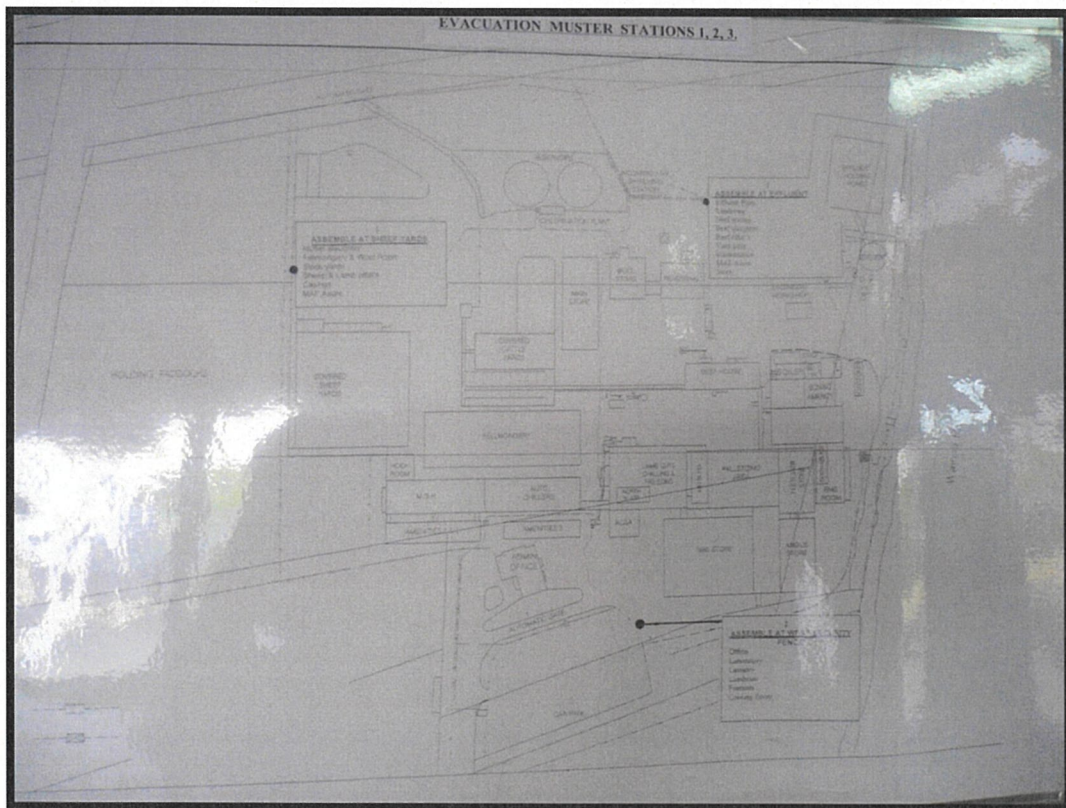


Figure 3: Site Plan

4.2 Site Servicing

AFFCO Wairoa is connected to town water supply and all toilets are connected to the town sewer. Stormwater is currently discharged to the Wairoa River (along with treated wastewater from the meatworks and fellmongery), which is subject to discharge consent from the Hawke's Bay Regional Council.

5 Environmental Effects Occurring/Observed

5.1 Environmental Effects

On the 29th January 2013 a site visit was undertaken to understand the nature of the AFFCO Wairoa operation. A discussion was held with the Plant Manager, Dean Tucker at that time. From the site visit and discussions with Dean, the following environmental effects were identified/observed.

5.1.1 Discharge to Air

Emissions to air at AFFCO Wairoa are created from a range of sources. These sources include, combustion emissions from the coal fired boiler, emissions from the fellmongery and rendering plant, and emissions from the effluent treatment plant and associated holding ponds.

Under normal operations the discharges to air are not generally detectable or objectionable, however there are incidents when odour is detected and occasionally generates complaints from nearby residents. Given the site's proximity to a suburban residential area, it is important that emissions are managed and that continual improvements are made wherever possible.

According to Dean Tucker, the rendering plant (which is a recent addition to the Plant) is among the best regarded in the country in terms of managing odour and waste products.

5.1.2 Traffic

The nature of this business means that there are regular truck movements into, around and out of the yard on a frequent basis.

The trucks entering the site from Flaxmill Road are generally large stock trucks that transport livestock to the site.

The trucks entering the site from Hunter Brown Street are generally goods trucks that are used to transport product from the site to market.

Trucks access the site at all times of the day and night to deliver and receive stock/ product.

Employees of the AFFCO Wairoa operation park in the dedicated staff parking area off Hunter Brown Street.

NOTE: AFFCO Wairoa recently installed a new swipe card system for night shifts on the Flaxmill Road entrance gate and this has subsequently diverted 35% of traffic that used to enter the site from Hunter Brown Street. Approximately 20 trucks per day still enter the site through the Hunter Brown Street entrance. Truck movements are now fairly evenly spread across both gates.

5.1.3 Visual Impact

The visual impact of the AFFCO Wairoa site is historical. The site has been located in the area for a long length of time. Although a large operation, the site is generally considered to be an acceptable feature of the landscape.

5.1.4 Wastewater/ Stormwater Discharge

Currently wastewater and stormwater are discharged into the onsite water treatment facility which has appropriate resource consents. This facility is located well away from State Highway 2 and Hunter Brown Street therefore any adverse effects are generally limited. This facility is carefully monitored to ensure appropriate resource consent compliance.

5.1.5 Noise/ Vibration

Noise/ vibration is inevitable in a yard such as this one, particularly given the large number of truck movements to and from the site on a regular basis. The trucks braking to enter the site, their manoeuvres whilst entering, turning and exiting the yard all generate noise/ vibration.

The hours of operation at the site are 24 hours a day, 7 days a week during peak operating season.

5.1.6 Hazardous Substances

AFFCO Wairoa store various hazardous substances on-site. The plant is HASNO certified with 14 staff trained as handlers, as per HASNO requirements. The plant is audited annually to ensure compliance. All substances are secured in bunded, locked areas, and detailed spill response plans are in place.

5.2 Complaints History/Experience

From a review of the Wairoa District Council complaints records, there have been 3 complaints recorded in the last 5 years (in February and August 2008, and February 2009), which all related to offensive and objectionable odour.

From a review of Hawke's Bay Regional Council's complaints register there have been 9 complaints recorded in the last 5 years, with the last one recorded in 2010. The majority of complaints received were in relation to offensive odour, with one complaint relating to black smoke emanating from the boiler stack. In most instances, odour issues were tracked to specific management and plant malfunction incidents. In three of these cases, the reason for the odour was traced to the effluent plant shed door being left open. This door has subsequently been fitted with a padlock to enable managed entry and exit.

From a discussion with the Plant Manager, Dean Tucker, there have been several complaints received in the past regarding site operations, regarding odour, noise and night time traffic effects.

6 Environmental Initiatives

6.1.1 Air Discharge

Necessary resource consents have been obtained from Hawkes Bay Regional Council for:

'discharge contaminants into the air from the operation of the company's meat processing operation at Wairoa, including the following processes:

- *Products of combustion from a 15 MW coal fired boiler*
- *Fellmongery*
- *Effluent treatment plant*
- *Rendering plant*
- *General associated operations to those above'.*

The operation has been regularly monitored by Hawkes Bay Regional Council with compliance reports returning 'Full compliance with conditions has been achieved'. For the latest Monitoring Report refer to Appendix 3.

The rendering plant, which was commissioned in 2007, is fully enclosed and all odour ventilated through a bio-filter. In 2010, the effluent plant shed was connected to its own purpose built bio-filter. These initiatives have comprehensively addressed odour issues.

6.1.2 Noise

Historically there have been minor issues in relation to the handling of large steel bins which can cause noise. The transport companies using these steel bins have been required to better manage noise levels in this regard.

AFFCO Wairoa have made attempts to address traffic noise on Hunter Brown Street through measures to divert as much heavy vehicle traffic as possible to the Flaxmill Road entrance, including the installation of swipe card entry on the Flaxmill Road entrance to enable trucks to enter that gate at all hours. These measures are estimated to have reduced truck traffic through the Hunter Brown Street entrance by approximately 35%. Approximately 20 trucks per day still enter the site through the Hunter Brown Street entrance. Truck traffic is now fairly evenly spread across both gates.

In addition, stock management practices on-site, are carefully managed to ensure there is minimal animal noise (calm animals throughout process). Stock are also held at the rear of the site, therefore there is added benefit of intervening buildings for reducing noise emanating to the residential area.

6.1.3 Community Engagement

The regional consent for discharge to air from AFFCO Wairoa's operations includes a condition requiring AFFCO Wairoa to facilitate regular meetings with the AFFCO Wairoa Odour Working Party. AFFCO Wairoa has been running these on a regular basis, but notes that fewer and fewer people are attending, which is attributed to odour issues having been addressed over time.

7 Current Planning Status

7.1 District & Regional Plan Compliance

The two relevant planning documents that apply to the AFFCO Wairoa site and operations are:

- the Wairoa District Plan (June 2005), administered by Wairoa District Council;
- the Hawke's Bay Regional Resource Management Plan (August 2006), administered by Hawke's Bay Regional Council.

7.1.1 Compliance with the Wairoa District Plan (June 2005)

The following table provides an assessment of the AFFCO Wairoa land use activity in terms of compliance with the provisions of the current operative Wairoa District Plan.

The following is an assessment of the activity against the standards and conditions for permitted activities that would be relevant to the establishment of AFFCO Wairoa if it were being newly established in its current location under the current District Plan rules¹:

Wairoa District Plan		
Chapter 20 – Industrial Zone		
“Rule 20.7.1 – Permitted Activities		
Any activity that complies with all the standards and conditions for permitted activities.”		
Section 20.8.1 – Noise	20.8.1 All activities shall be designed and conducted to ensure that the following noise limits are not exceeded:	<p>The locational circumstances of the AFFCO Wairoa site (having area of ‘Residential’-zoned land adjoining the site) would invoke the noise limits contained in both Tables A & B.</p> <p>The limits in Table A are the same as those that apply within the Residential Zone itself. The limits in Table B are significantly higher than for sole residential environments, reflecting lower amenity expectations <u>within</u> an Industrial Zone.</p> <p>In the qualified opinion of Wairoa District Council's Environmental Health Officer, noise emanating from the AFFCO Wairoa site would likely comply with these noise limits in the most part.</p>
	A. At or within the notional boundary of any dwelling or place of assembly in zones other than the Industrial Zone: 7am to 10pm	
	50 dBA L10	
	10pm to 7am	
	40 dBA L10	
	On any day between 10pm – 7am	
	65 dBA Lmax	
	and/or	
	B. At or within the boundary of any property other than the property from which the noise is being emitted: 7am to 10pm	
	65 dBA L10	
	10pm to 7am	
	55 dBA L10	
	At all times	
	75 dBA Lmax	

¹ Note, section 10 of the Resource Management Act 1991 provides for certain existing use rights for land use. Under this section, essentially a land use may continue in a manner that contravenes a rule in a district plan or proposed district plan if:

- the use was lawfully established before the rule became operative or the proposed plan was notified,
- the effects of the use are the same or similar in character, intensity and scale, and
- activities have not been discontinued on the site for a continuous period of more than 12 months.

		AFFCO Wairoa would therefore likely comply with these standards if it were being established in this location under the current District Plan.								
Odour	<p>20.8.2 Note: The discharge of odour to air is controlled by rules in the Hawke's Bay Regional Air Plan and Proposed Regional Resource Management Plan. Land use zoning and separation distances are the methods employed within the District Plan to deal with odour issues.</p> <p>20.8.3 Any new dwelling shall be set back 200 metres from any buildings associated with any existing intensive farming activity, oxidation pond, effluent holding pond or waste disposal area.</p> <p>20.8.4 Any building associated with a new intensive farming activity, oxidation pond, effluent holding pond or waste disposal area shall be set back in accordance with the following separation distances:</p> <p>Feature Separation Distance (m):</p> <ul style="list-style-type: none">From a Town Centre or Residential Zone Boundary = 500mFrom a Settlement Zone Boundary or any Individual Residence in any other zone = 200m	<p>AFFCO Wairoa hold the necessary resource consents from Hawkes Bay Regional Council in relation to discharges to air including odour (this is detailed later in this report).</p> <p>It is likely that AFFCO Wairoa's effluent holding pond would meet the separation distance in Rule 20.8.4 to the boundary of the Residential Zone. However, there is one neighbouring residence that is less than 200m distance from the pond.</p> <p>On that basis, AFFCO Wairoa's effluent holding pond would not fully comply with Rule 20.8.4 if it were being established in this location under the current District Plan.</p>								
Glare	<p>20.8.5 Light emissions measured from any site shall not exceed a measurement of 10 lux (lumens per square metre) measured at 1.5 metres above ground level at the site boundary.</p> <p>20.8.6 No building or structure shall be finished with materials that create a glare nuisance to neighbouring properties or road users.</p>	<p>It is likely that AFFCO Wairoa would comply with these standards.</p>								
Privacy, Shading and Visual Amenity	<p>20.8.7 All buildings shall meet the following bulk and location requirements:</p> <table><tr><td>Minimum Front yard</td><td>5.0m</td></tr><tr><td>Minimum Side yards</td><td>Nil, except for (1) below</td></tr><tr><td>Minimum Rear yard</td><td>Nil</td></tr><tr><td>Maximum Building height</td><td>15.0m (2)</td></tr></table> <p>(1) Where activities in an Industrial Zone adjoin a Residential Zone, the side yard shall be 1.5 metres.</p> <p>(2) No part of a building shall exceed a height of 2 metres plus the shortest horizontal distance between that part of the building and the nearest site boundary where this is to a residential property.</p> <p>20.8.8 Where a non-residential activity is to locate within or adjacent to land zoned 'Residential', or land used principally for residential purposes, screening shall be provided along the boundary to a height of 1.8 metres.</p>	Minimum Front yard	5.0m	Minimum Side yards	Nil, except for (1) below	Minimum Rear yard	Nil	Maximum Building height	15.0m (2)	<p>It is likely that AFFCO Wairoa would comply with these standards.</p>
Minimum Front yard	5.0m									
Minimum Side yards	Nil, except for (1) below									
Minimum Rear yard	Nil									
Maximum Building height	15.0m (2)									

Hazardous Substances	<p>20.8.14 The use, storage, disposal or transportation of hazardous substances shall not exceed the Medium Threshold Hazard Factor (refer definitions and Appendix III for examples).</p> <p>20.8.15 Any activity involving the use, storage, disposal or transportation of hazardous substances on-site, shall ensure that any area or container used is designed, constructed and managed to prevent any leakages or spills.</p> <p>20.8.16 Any activity involving the use or storage of hazardous substances exceeding the Low Threshold Hazard Factor (excluding all below ground tanks, and the above ground storage of petrol or diesel for the purposes of farming activities where the tank is at least 20 metres away from any natural watercourse or site boundary), shall provide a secondary containment system sealed with impervious materials equalling the maximum volume of the hazardous substance on site.</p>	<p>'Freezing works and rendering plants' and 'Wastewater Treatment Plants' are identified as 'High Threshold Hazard Factor' facilities in Appendix III of the District Plan.</p> <p>As these exceed the 'medium' threshold, the establishment of AFFCO Wairoa would not comply with Rule 20.8.14 if it were being established in this location under the current District Plan.</p>
Chapter 24 Access and Parking	<p>Access</p> <p>24.2.1 Where access is to a sealed road, the accessway shall be sealed or paved from the edge of the existing seal of the road pavement to the property boundary, or 5 metres in from the edge of the existing seal, whichever is the closest. This requirement applies to:</p> <ul style="list-style-type: none"> i) Arterial and Secondary Arterial Roads; or ii) Any roads where access is likely to exceed 4 vehicle movements per week (averaged over the period of one calendar year). <p>24.2.2 Vehicle crossing design shall be provided in accordance with the relevant diagram in Appendix I, except that access shall be designed to accommodate the swept path of the largest vehicle expected (i.e. for left turns, the access must be designed so that the vehicle does not cross the road centre line).</p> <p>24.2.3 Where access is to an Arterial or Secondary Arterial Road, sufficient manoeuvring space shall be provided on-site, adequate to enable vehicles to enter and exit the site in a forward direction.</p> <p>Parking</p> <p>24.2.5 The number of parking spaces to be provided on-site in association with an activity shall be in accordance with Table 2 below. Processing and storage facilities - 1 space per 200m² gross floor area, plus 1 space for heavy vehicles.</p>	<p>It is likely that AFFCO Wairoa would comply with these standards.</p>

If AFFCO Wairoa was to newly establish in the same location under the rules of the operative District Plan, the land use would require a resource consent as a Discretionary Activity for failing to meet one or more of the performance standards and terms for activities in the Industrial Zone (notably, effluent holding pond separation distances and hazardous substances thresholds).

However, as AFFCO Wairoa was lawfully established prior to the operative District Plan, and has not been discontinued on the site for a continuous period of more than 12 months, and the effects have remained the same or similar in character, intensity and scale, the operation can rely on existing use rights pursuant to section 10 of the Resource Management Act 1991.

It is noted however, that whilst the site likely complies with the limits in the District Plan, noise is also regulated by section 16 of the Resource Management Act 1991. Under section 16, AFFCO Wairoa has a general duty to avoid unreasonable noise – ‘Every occupier of land... shall adopt the best practicable option to ensure that the emission of noise from that land...does not exceed a reasonable level’. Enforcement of this specifically excludes noise from trains or vehicles on roads, and only relates to noise heard from a place other than where the noise is made.

7.1.2 Compliance with the Hawke’s Bay Regional Resource Management Plan (August 2006)

The following table provides an assessment of AFFCO Wairoa activities in terms of compliance with the provisions of the current operative Hawke’s Bay Regional Resource Management Plan.

The following is an assessment of the activity against the applicable rules, and any relevant standards and conditions for permitted activities, in the current Regional Plan²:

Hawke’s Bay Regional Resource Management Plan		
Discharges to Air		
Rule 28 Miscellaneous Industrial & trade premises	<p><i>The discharge of contaminants into air from any industrial or trade premises arising from any of the following activities, that is not specifically regulated by any other rule within this Plan:</i></p> <ul style="list-style-type: none"> • combustion of coal, light fuel oil, heavy fuel oil or untreated wood with a maximum heat output that exceeds 100 kW • rendering, tanning, fellmongering, skin or hide processing, or pet food processing <p>is a Discretionary Activity.</p>	<p>AFFCO Wairoa carry out activities that are caught by Rule 22, and hold a resource consent for ‘discharge contaminants into the air from the operation of the company’s meat processing operation at Wairoa, including the following processes:</p> <ul style="list-style-type: none"> • Products of combustion from a 15 MW coal fired boiler • Fellmongery • Effluent treatment plant • Rendering plant • General associated operations to those above’.
Rule 29 Minor discharges from industrial & trade premises	<p><i>The discharge of contaminants into air from any industrial or trade premises that is not specifically regulated by any other rule within this Plan, including:</i></p> <ul style="list-style-type: none"> • discharges of heat to air • discharges of dust arising from the loading, unloading, and conveyance of goods and materials (including aggregates). <p>is a Permitted Activity subject to various specific conditions, standards and terms.</p> <p>Conditions of particular relevance include:</p> <ol style="list-style-type: none"> a. The opacity of any discharge of smoke when measured at the point of discharge shall not exceed 20%, except that a discharge in excess of this shall be permitted for a period of not more 	<p>AFFCO Wairoa are likely able to comply with all the conditions and terms of Rule 29 in respect of discharges of heat to air and discharges of dust.</p> <p>Note: AFFCO Wairoa holds a resource consent for ‘discharge contaminants into the air from the operation of the company’s meat processing operation at Wairoa’.</p>

² Note: Existing use rights do not apply to rules in a regional plan.

	<p>than two minutes continuously or for an aggregate of four minutes in any 60 minute period.</p> <p>d. At any point beyond the boundary of the subject property, or on public land;</p> <p>i. The discharge shall not result in any noxious or dangerous levels of airborne contaminants;</p> <p>ii. There shall be no visible discharge of any contaminant, other than smoke from fuel burning equipment or water vapour;</p> <p>iii. Any discharge of water vapour shall not result in any plume which adversely affects traffic safety, or reduces visibility within a height of 5 metres above ground level, or reduces visibility within recognised flight paths in the vicinity of airports;</p> <p>iv. The discharge shall not result in any offensive or objectionable odour;</p> <p>v. The dust deposition rate resulting from the discharge shall not raise the ambient dust deposition rate by more than 4g/m² per 30 days;</p> <p>vi. The discharge shall not result in any objectionable deposition of particulate matter on any land or structure.</p>	
Discharges to Land		
<p>Rule 36</p> <p>Existing high discharge volume sewage systems</p>	<p>The discharge of contaminants onto or into land, and any ancillary discharge of contaminants into air, from any existing sewage system with a discharge volume exceeding 2m³/day averaged over any 7 day period is a Restricted Discretionary Activity.</p>	<p>AFFCO Wairoa carry out activities that are caught by Rule 36, and hold a resource consent for its on-site effluent treatment system.</p>
Discharges to Water		
<p>Rule 47</p> <p>Discharges to surface water</p>	<p>The discharge of contaminants into surface water, pursuant to section 15(1)(a) RMA, except as expressly regulated by other rules in this Plan.</p> <p>is a Permitted Activity subject to various specific conditions, standards and terms.</p>	<p>AFFCO Wairoa are unable to comply with all the conditions and terms of Rule 47, and hold a resource consent for discharges to the Wairoa River from its on-site effluent treatment system.</p>

Water Takes		
Rule 53	<i>The take and use of groundwater, excluding the take and use of groundwater from the water management zones shown in Schedule VI.</i>	AFFCO Wairoa are unable to comply with all the conditions and terms of Rule 53, and hold a resource consent 'to take and use water from well no. 15657 (200mm diameter) to provide a non-potable water supply to a meat processing factory'.
Minor takes and uses of ground water	is a Permitted Activity subject to various specific conditions, standards and terms.	

AFFCO Wairoa carry out various activities that are captured by rules in the Hawke's Bay Regional Resource Management Plan, leading to a requirement for a number of resource consents to address those aspects of their operations. AFFCO Wairoa has all the necessary resource consents for its discharges to air, land and water and for its groundwater take.

7.2 Operational Resource Consents

AFFCO have several operational resource consents, each of which have a number of conditions of consent attached to them.

Wairoa District Plan

- **Land Use Consent** – No land use consents

Hawkes Bay Regional Council – Regional Resource Management Plan

- **Discharge Permit** – Consent No. DP070026Aa – 'discharge contaminants into the air from the operation of the company's meat processing operation at Wairoa, including the following processes:
 - *Products of combustion from a 15 MW coal fired boiler*
 - *Fellmongery*
 - *Effluent treatment plant*
 - *Rendering plant*
 - *General associated operations to those above*'.

This consent is granted for a period expiring on 31 May 2022.

- **Water Permit** – Consent No. WP110007T – 'to take and use water from well no. 15657 (200mm diameter) to provide a non-potable water supply to a meat processing factory'. This consent is granted for a period expiring on 31 May 2031.

Copies of the above consents are attached in Appendix 2 to this report.

7.2.1 Conditions of Consent

Discharge Permit (DPO70026Aa) - discharge contaminants into the air from the operation of the company's meat processing operation at Wairoa

The above resource consents impose a range of conditions on the AFFCO Wairoa operation, and a number of monitoring requirements. The most notable of these are:

General:

- 2. The concentration of hydrogen sulphide shall not exceed 7 ug/m³, as a 1 hour average, in the ambient air at or beyond the boundary of the premises as a result of emissions from the consent holders property*
- 3. There shall be no discharge of any objectionable particulate matter on any land or structure beyond the boundary of the site*
- 4. There shall be no discharge of offensive or objectionable odours beyond the boundary of the site.*
- 20. Annual testing shall be carried out to measure the concentration of hydrogen sulphide in the ambient air beyond the boundary of the premises. These tests shall be carried out by the Council, or by a suitably qualified person using test methods as authorised by the Council.*
- 21. Condition 21 requires a management plan to be prepared.*
- 22. The Consent Holder shall facilitate, in conjunction with AFFCO Wairoa Odour Working Party, regular meetings at a frequency determined by the consent holder and the AFFCO Wairoa Odour Working Party, but not less than once each calendar year. Minutes from these meetings shall be made available to Council on request.*

There are also specific conditions for the **coal fired boiler** emissions which include:

- Restrictions around PM₁₀ concentrations of 200 milligrams of gas discharged into the air (with the exception of 30 minutes following the start up of the boiler).
NOTE: By the 31 December 2011 the discharge to air from the coal fired boiler system shall be reduced to a PM₁₀ concentration of 100 milligrams.
- The coal fired boiler is also required to operate using coal with a restricted sulphur and ash content and biosolids pre dried to not more than 25% moisture and sourced from the on-site effluent treatment plant only.
- Emission testing (as per the requirements contained within Condition 19) of the coal fired boiler is required annually.

There are a number of specific conditions for the **rendering plant** which include:

- Containment of odour and regular inspections to ensure that the associated system and maintenance practices are operating effectively. All inspections are to be recorded.

There are a number of specific conditions for the **Effluent Treatment Plant** which include:

- *'Within 16 months of the commencement of consent, if the biosolids belt press is still in operation, the biosolids building shall be fully contained and ventilated to a biofilter'.*

Water Permit (WP110007T) 'to take and use water from well no. 15657 (200mm diameter) to provide a non-potable water supply to a meat processing factory'.

The above resource consents impose a range of conditions on the AFFCO Wairoa operation, and a number of monitoring requirements. The most notable of these are:

- 1) The rate of taking shall not exceed 5 litres per second.*
- 2) The volume taken shall not exceed 3000m³ per week.*
- 3) A water meter shall be installed prior to the exercise of this consent, and maintained to measure the volume of water taken to an accuracy of +/- 5%. The device shall be installed and maintained in accordance with the Council's "Technical Specifications and Installation Requirements for Flow Meters" (February 2010).*

Data Returns:

There are a number of reporting requirements as per conditions 4 – 6 and 10.

Restrictions:

- 7) No water shall be taken during "no take" periods specified by the Council for the purpose of obtaining accurate hydrological measurements, provided that:*
 - a) the 'no take' period specified by Council is of no longer than twenty four (24) hours duration,*
 - b) the Council gives at least 7 days notice to the consent holder of the time of the 'no take' period,*
 - c) consecutive 'no take' periods are separated by an interval of at least 14 days.*

7.2.2 Consent Compliance History

Hawke's Bay Regional Council regularly monitors AFFCO Wairoa for compliance with the conditions of its resource consents.

The AFFCO Wairoa site is inspected annually by Hawke's Bay Regional Council in relation to Discharge Permit (DP070026Aa). Monitoring inspections were undertaken on 28 July 2011 and again on 29 April 2012. The most recent Monitoring Report dated 1 May 2012, and also the prior Report to this dated 16 November 2010, both recorded the operation as being fully compliant with the consent conditions. A copy of the most recent Monitoring Report (dated 1 May 2012) is attached in Appendix 3 to this report³.

NOTE: Over the past 12 months, AFFCO Wairoa has been undertaking a study of the entire Wairoa air shed to measure Air Quality in the District – this is expected to be submitted to Hawke's Bay Regional Council later this year.

7.3 Summary of Compliance

AFFCO Wairoa is not required to hold any land use consents from Wairoa District Council by virtue of existing use rights. These existing use rights apply to the land use itself so long as the operation is not discontinued for a continuous period of 12 months or more, and so long as the effects of the use remain the same or similar in character, intensity and scale.

However, AFFCO Wairoa carry out various activities that are captured by rules in the Hawke's Bay Regional Resource Management Plan. Existing use rights do not apply to regional rules.

³ As previously noted, this Scoping Report does not address AFFCO Wairoa's regional consent to discharge treated wastewater and stormwater to the Wairoa River.

AFFCO Wairoa holds all necessary resource consents for those aspects of its operations from Hawke's Bay Regional Council. These consents have numerous conditions attached to them, and the Regional Council monitors compliance with those conditions on a regular basis.

In terms of its resource consent for discharges to air (the most relevant consent in terms of effects on neighbouring residential amenity), AFFCO Wairoa has made continuous improvements over time and has been deemed by the Regional Council to be fully compliant with the conditions of its consent in more recent years.

All in all, AFFCO Wairoa achieve general compliance with relevant District and Regional planning requirements, largely operating under regional consents from Hawke's Bay Regional Council.

8 Conclusions & Recommendations

From a review of on-site activities, AFFCO Wairoa achieves general compliance with relevant District and Regional planning requirements. All discharge and water takes are subject to regional consents from Hawke's Bay Regional Council, and as such are subject to comprehensive consent conditions and regular monitoring requirements to ensure compliance.

The operation is subject to regular scrutiny (in addition to environmental regulations, AFFCO are also regularly audited by the USDA and EU, and operate under a Risk Management Program approved by the Ministry of Primary Industries). Over time, AFFCO Wairoa has progressively implemented (and continues to implement) measures in an attempt to respond to and address any significant adverse effects of its activities on the natural environment and on neighbouring residents.

Overall it is recommended that AFFCO Wairoa be encouraged and supported to:

- 1) Continue to achieve compliance with its regional consents.
- 2) Continue to identify opportunities, and implement technological and site management improvements, that result in on-going improvements in overall environmental performance.
- 3) Participate in any community advisory group that may be established to facilitate positive relationship building between local businesses and the residents of North Clyde.