

Application:

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Date: 9/3/2018

Addendum to CLS consents submission Anton and Christine Nikoloff

Clarification regarding potential heavy metals and other nutrients in compost.

In my submission I raised the issue of containing and treating nutrients and heavy metals resulting from the composting operation at Diversion Rd. In doing that I was not trying to be sensationalist, or raise red herrings.

Every waste stream has different contaminants that need to be contained and factored into the management of the particular operation.

Compost operations concentrate products, so for instance in dealing with green waste from residential rubbish collection, agricultural chemicals, lead and other heavy metals (eg silver), might eventually end up in the waste stream and so may need to be contained, treated, or minimized in some way, so they don't contaminate the environment. Consequently some way of dealing with those potential problems needs to be developed.

With regards to the CLS compost operation at Diversion Rd, I have no concerns regarding the use of sawdust or bark, but composting them will generate nutrients which need to be contained and not discharged to the environment.

Regarding the use of Paunch Grass; my expectation is that a best practice operator would have knowledge of, or investigate what, if any potential contaminants, or pathogens, the product might introduce into their compost and as a consequence potentially be discharged to the environment.

There may not be any by products that are of concern but until an investigation is undertaken, it cannot be shown there is no problem. I would expect that a similar thing would occur for any other waste products (such as grease trap material) that might be introduced to the composting operation.

Currently this has not been done for Paunch Grass at Diversion Rd.

In relation to Cadmium and Paunch Grass there are documented concerns in NZ about the level of that element in soils in NZ, and of it entering the human food chain¹. The concerns are related to potential for regular exposure to Cadmium causing cancer.

I would expect CLS's consent application to demonstrate they are aware of this, or other potential problems and develop a treatment/ management plan to deal with the problems.

In other words demonstrating awareness of potential discharges and providing practical and workable mitigating strategies. Not bland statements made with the view to having things look ok on paper.

¹Cadmium Accumulation in Waikato Soils, 2005. Waikato District Council Report TR2005/51.

Further comment

During the course of the hearing, CLS have changed some of their proposed conditions of consent.

It is good that they are taking notice of the submissions, and trying to make adjustments. My concern relates to the thinking that might undergird that activity. In that by tweaking some of the conditions to the consent CLS are going to achieve the change that is necessary for this operation.

If that is so, therein lies a real problem.

In my submission I suggested that the hurdle bar needed to be set at a high level, not only for consent but in terms of the whole approach CLS have to the operation of Diversion Rd.

At the moment, in terms of the proposed plant and its operation, from my perspective the bar is at a low level.

I consider that there is such a significant step change for CLS to make in their general thinking, attitude to neighbours and in the way the operation needs to be managed, that I doubt they have the capacity to make the changes necessary.

To do so may well require a significant level of help.

Consequently the question I need to ask is this; Supposing CLS were given the opportunity to start a change process, who is going to bear the inevitable fallout from the learning process and consequent mistakes?

Is it going to fall, as it has done in the last 10 months, on the surrounding community?

I do not think there is any justifiable reason for that to occur.