

**From:**  
**To:** [Hearings](#)  
**Cc:**  
**Subject:** HPE CM: Notifications Consent Submission: Group 492  
**Date:** Tuesday, 19 November 2019 10:24:12 AM  
**Attachments:**

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**Group ID: 492**

**Consent name:** Oceania Dairy Limited

**Consent number:** CRC201187, CRC201191, CRC201192, CRC201188, CRC201190, CRC201194

**Name:** Julian Joy

**Care of:**

**Mailing address 1:**

**Mailing address 2:**

**Suburb:**

**Town/City:**

**Post-code:**

**Country:**

**Mobile phone:**

**Work phone:**

**Home phone:**

**Email:**

**Contact by email:** Yes

**Is a trade competitor:** No

**Directly affected:** No

**Consent support/hearing details**

- CRC201187: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201191: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201192: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201188: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201190: oppose | NOT to be heard | will NOT consider joint hearing
- CRC201194: oppose | NOT to be heard | will NOT consider joint hearing

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**Reasons comment:**

The plant that is the subject of this submission is a modern facility, but clearly has had

inadequate planning for water use for the life of the plant. The company's website claims local interests, and that it produces 47,000 Tonnes of milk powder per year. (<https://oceaniadairy.co.nz/plant/>). Resource consent CRC174196 allows for waste water maximum of 836,470 m<sup>3</sup> per year, which is very high for a modern dairy plant, indicating ineffective design in treatment of waste materials and plant byproducts. Re-using and recycling this waste water within the plant is the method that should have been planned for in this plant's construction, and for the company to now ask for permission to send waste material into the local coastal waters, with the inevitable pollutant effects, is irresponsible and technically backward. The investment involved would be better spent on re-use technologies and I submit that the Authority should decline the application and require the company to use modern waste re-use strategies and practices.

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**Consent comment:**

Decline all the applicant Oceania Dairy Limited's requests and require that the company develop effective on-site waste water re-use technologies that the Authority can in due course approve.

Submission by Julian Joy, B.Sc, MSCM, FCILT

RESOURCE MANAGEMENT ACT 1991

Applicant: Oceania Dairy Limited

Address for service: C/- Babbage Consultants Limited,  
Attn: Joe Gray or email

Resource consent applications:

Oceania Dairy Limited has applied to Canterbury Regional Council for six resource consents relating to the construction of a 7.5 kilometre pipeline and discharge of treated wastewater from a milk-processing factory situated at 30 Cooney's Road, Glenavy, into the Coastal Marine Area.

The company's website claims that it has local interests at heart, and that it produces 47,000 Tonnes of milk powder per year. (<https://oceaniadairy.co.nz/plant/>).

The plant that is the subject of this submission is a recently constructed facility, but clearly the development has involved inadequate planning for water use for the life of the plant. Even at a poor utilisation level, the plant would probably use in the order of 100,000 Tonnes of water per year, averaging around 300 Tonnes per day. (My rough estimate, no data from the company in that calculation). Resource consent CRC174196 allows for a waste water maximum of 836,470 m3 per year, which is an average of around 2,300 m3 per day. This is a very high waste value, and although it covers mainly waste water, it is clear and accepted in the application that other contaminants and waste products are included in that water. Re-using and recycling this water within the plant is the method that should have been required to be planned for in this plant's construction several years ago.

On the company's website they claim to be sustainable in their supply chain, but discharging waste material, mainly water, of this magnitude into the maritime coastal environment is far from sustainable and shows that the publicity image is certainly not backed by the company's actual practice. The following headline is from their website, accessed 19<sup>th</sup> November 2019.

**“CIIE 2019: Yili Establishes Dairy Industry's First Sustainable International Supply Chain Network”**

<https://oceaniadairy.co.nz/2019/11/14/ciie-2019-yili-establishes-dairy-industrys-first-sustainable-international-supply-chain-network/>

A sustainable supply chain starts with the raw materials and processes for these are well documented internationally; this current application is not for anything remotely resembling a sustainable supply chain process.

The significant capital expenditure involved in the project that is the subject to this application would be more effectively spent on adopting waste re-use technologies and the Authority should



require this strategy, rather than allowing a backward step in New Zealand's agricultural, environmental, and industrial development.

Re-using and recycling this waste water within the plant is the method that should have been planned for initially in this plant's construction, and for the company to now ask for permission to send waste material into the local coastal waters, with the inevitable pollutant effects, demonstrates irresponsibility and technical backwardness.

The capital involved is better spent on waste re-use technologies, all of which currently exist, and I submit that the Authority should decline the application and require the company to use modern waste re-use strategies and practices, suitable for the New Zealand local environment.

This strategy would then require separate applications covering on-site processes which I would then support.

Submission by Julian Joy, B.Sc, MSCM, FCILT