



## FORM 13

### Submission on a publicly notified application concerning resource consent under section 96, Resource Management Act 1991

To: Environment Canterbury

**Name of submitter: Ministry of Education ('the Ministry')**

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This is a submission on an application from Tegel Foods Limited (Tegel) at 112 Carmen Road, Christchurch (legally described as Section 27 SO 4597717). The application is for resource consent to discharge contaminants to air from a poultry processing plant including the following;

- Combustion products from the operation of six boilers with a combined heat output of 7 megawatts, and from the operation of a poultry smokehouse; and
- Odour from poultry processing, a protein recovery (rendering) plant and wastewater storage and conveyance.

The application (CRC194459) is to replace the existing consents for discharges to air from the plant. The application seeks to continue operation at the current production levels, with no increases to the scale of the activity. Production rates vary but approximately 350,000 chickens are processed on-site each week. Turkey production is seasonal with approximately 6,000 turkeys processed each week over most of the year and production increasing to approximately 25,000 turkeys per week in advance of the Christmas period. The consent duration sought is 20 years.

#### **The specific parts of the application that the Ministry of Education's submission relates to are:**

The Ministry's submission relates to the how the discharge of contaminants to air from the poultry processing plant affects students and teachers at Hornby Primary School and Hornby High School. Hornby Primary School and Hornby High School are located approximately 350 m to the south-west (see Figure 1 below). Students and staff at both schools experience odours from the plant which are considered to be offensive or objectionable.



Figure 1: Location of Hornby Primary School and Hornby High School in relation to the Tegel site at 112 Carmen Road.

### Background:

The Ministry is the Government's lead advisor on the education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry's overall purpose is:

"Lifting aspiration and raising education achievement for every New Zealander"

Amongst other matters, the Ministry has responsibility for managing all education property owned by the Crown. The Ministry also have a role in ensuring education providers have all resources and support they need to deliver services to students. The safety of students and teachers is a high priority and as such, the Ministry monitors and responds to resource consent applications that may have potential impact on the operation of a school.

Under the Resource Management Act (RMA) 1991, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The Ministry considers there to be a potential adverse effect from the proposed activity on the safety and wellbeing of students and teachers exposed to offensive or objectionable odour.

**The Ministry of Education's submission is:**

The Ministry opposes the application by Tegel Foods Limited.

The Ministry has concerns about the actual and potential adverse effects on the quality of the air of Hornby Primary School and Hornby High School from discharges from the Tegel plant. The existing Tegel operation, which is in relative proximity to the schools, has resulted in the discharge of odour which students and teachers at both schools have found offensive and unpleasant. The schools note that they experience a "freezing works" odour which can occur 3-4 days per month and is particularly noticeable during north easterly winds. The schools report that effects of the odour include lowering the concentration levels of students making teaching more difficult, increased incidents of asthma related illness and in turn student absenteeism, and the need to close windows.

The Ministry is concerned these effects will continue with the new resource consent and that the overall amenity of the schools will continue to be degraded, especially as the consent duration sought is 20 years.

It is understood that the applicant proposes improvements which are intended to reduce the adverse effects of odour. While the Ministry welcomes these improvements, further clarification is required on the following matters;

- The length of time that live birds are in the receiving area;
- Whether the solid materials from the screens are transported in enclosed conveyors. It is requested that enclosed conveyors are considered as these will aid in reducing fugitive odours;
- The environment management plan and odour management plan have not been included in the application documents supplied. It is requested that the following items are included in the plans to aid the management of odour beyond the site;
  - Procedures for daily and monthly cleaning of the Live Bird Reception and Storage Area;
  - Procedures for handling live birds in the event of plant breakdown to prevent odour beyond the site;
  - Procedures for product control prior to accepting Brinks material;
  - As only one fan is used for all extraction spare parts and/or a backup fan are requested to be kept onsite to minimise the duration of any odour events in the event of a biofilter fan failure;
  - Procedures for cleaning of the lines, tanks and other process equipment to prevent the build-up of degraded or anaerobic material;
  - Reporting of prolonged opening of doors in the Protein Recovery Plant building (for example to maintain the comfort of indoor temperatures for staff) and management procedures to reduce fugitive odour.
- The biofilter depth is confirmed as 1.2 m, however it is not clear from the AEE or supporting documentation if this includes the gravel plenum depth as well as the active biofilter media. It is requested that the depth of the bark and soil media of the biofilter (excluding the base layer of stone chip) is between 1.0 m and 1.5 m depth.

- As a single fan is used to draw odorous air from all the ventilated areas, it is requested that the individual extraction lines are monitored and tuned regularly so that the desired extraction rate is maintained at individual locations.
- The contact person and number of a site contact to be supplied to the Hornby Primary School, Hornby High School and the Ministry of Education to allow for prompt reporting and remedying of any offensive or objectionable odours that arise at the Schools.

**The Ministry of Education seeks the following decision from the consent authority:**

The Ministry seeks the application is refused or the applicant provides clarification that the proposed improvements at the Tegel plant will not result in the students and staff at Hornby Primary School and Hornby High School being adversely affected by the discharge of contaminants from the plant.

**The Ministry wishes to be heard in support of their submission.**



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**(Signature of person authorised to sign on behalf of the Ministry of Education)**

**Date:** 27 January 2020