

BEFORE THE HAWKE'S BAY REGIONAL COUNCIL AND HASTINGS DISTRICT COUNCIL

IN THE MATTER of the Resource Management
Act 1991

AND

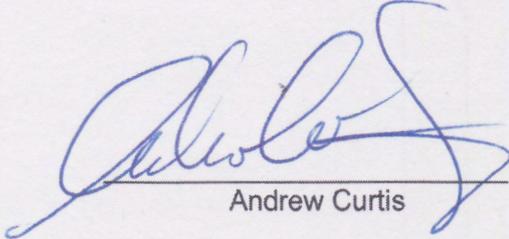
IN THE MATTER of an application by Te Mata
Mushroom Co. Ltd (TMMC) for
resource consents to discharge
contaminants to air.

JOINT WITNESS STATEMENT FOLLOWING CONFERENCING OF AIR QUALITY EXPERTS

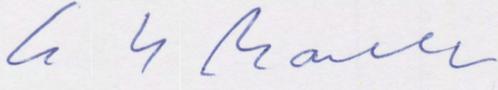
21 May 2019

1. This joint witness statement has been prepared as part of expert conferencing on the topic of odour, in relation to the application for resource consents made by TMMC to Hawke's Bay Regional Council (**HBRC**) and Hastings District Council (**HDC**). The application relates to the applicant's proposal to discharge odour to air from a mushroom composting and production facility, and to undertake associated land use activities .
2. The expert conference was held on 21 May 2019 at the AECOM New Zealand Limited Auckland office (and via conference call).
3. The air quality experts who attended the conference were:
 - (a) Andrew Curtis (engaged by Hawkes Bay Regional Council)
 - (b) Duncan Backshall (engaged by Hawkes Bay District Health Board)
 - (c) Jenny Simpson (engaged by Hastings District Council)
 - (d) Tracy Freeman (engaged by The Te Mata Mushroom Company Ltd)
4. This joint witness statement is prepared in accordance with section 4.7 of the Environment Court Practice Note 2014.
5. It is confirmed that all attendees have read the Environment Court Practice Note 2014, and agree to abide by the Code of Conduct.
6. Site visit
It was noted that neither Jenny Simpson nor Duncan Backshall had had an opportunity to visit the site at the time of the conferencing.
7. This joint witness statement sets out:
 - (a) those matters which are agreed between the experts;
 - (b) those matters which need to be addressed prior to the hearing that require further information; and
 - (c) those matters which are not agreed and the reasons in each case.

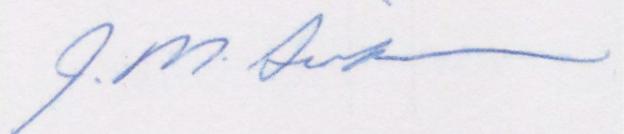
Dated 23 May 2019



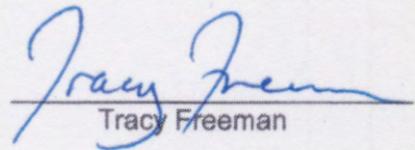
Andrew Curtis



Duncan Backshall



Jenny Simpson



Tracy Freeman

	Issue/question	Matters agreed	Further information required prior to the hearing	Matters not agreed (with each expert's view and reasons)
1.	Whether further mitigation is required to deal with the storage and handling of chicken litter.	We considered that current storage and handling procedures are appropriate and no further mitigation is required.		
2.	Whether the proposal to wet bales by dunking needs to be implemented prior to increases in production.	The potential odours from this activity are currently likely to be masked by other sources. We recommend that the timing of the implementation of bale dunking is reconsidered once other higher priority mitigation is implemented.		
3.	Whether the proposed bale breaking system needs to be implemented prior to increases in production.	We agreed that implementing this mitigation measure is a high priority, as this is likely to be the most significant remaining odour source on site after the modification to the methods for bunker-to-bunker transfers and bunker-to-Phase 2 transfers. Ideally this would be implemented as soon as practicable and Andrew Curtis, Jenny Simpson and Duncan Backshall agreed that	A review of the most recent odour complaints comparing date and times with activities.	Tracy Freeman was not convinced on the need to implement this measure well before production reaches 200 tonnes, as the analysis of complaints up to August 2016 showed that the bale break activity is not a common cause of complaints, but would reconsider this issue following

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		this. should be implemented well before production reaches 200 tonnes		review of the most recent odour complaints.
4.	The effectiveness of the extended hoods to capture odours from Phase One.	The extended hoods are a compromise method of collecting odours during transfer, compared to full enclosure. We consider that the use of extended hoods over any bunker openings of the Phase one building that are used for filling is essential and, with appropriate extraction and treatment of odours, should reduce off-site odours (subject to detailed design).	Appropriate engineering information on the extraction and treatment system and how the proposed system would work.	
5.	Is the recycling of compost leachate for irrigating the bales problematic and a potential odour source.	We agreed that the use of aerated recycled leachate is unlikely to result in additional odour emissions compared to using fresh water to wet the bales.		
6.	Whether there are other methods that could be implemented which are more effective for controlling odours from Phase One Transfer.	There are other methods which could control odours more effectively than the proposed extended hoods, for		

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		example full enclosure or automated transfer equipment.		
7.	Whether the methods proposed to control odours from the loading of Phase Two tunnels are appropriate.	We consider that what is proposed (the enclosure of the mixed compost and Phase two loading area, with extraction and appropriate treatment) is appropriate.		
8.	Whether a staged approach to implementation of further mitigation is appropriate for this site given the level of community concern.	There was a general discussion on this, and we agreed that there needs to be a clear timetable for the implementation of mitigation, and the ability to accelerate the implementation of specific measures if required. There needs to be a careful consideration about how "if required" is defined.		
9.	Whether the assessed reduction in odour frequency is sufficient to reduce the risk of odours being considered offensive and objectionable by the local community.	We agreed that there is uncertainty as to whether the proposed measures will reduce odours to the level where no offensive or objectional effects occur. However, we considered that once		

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		<p>implemented, the proposed measures will reduce the odour risk.</p> <p>The systematic implementation of mitigation in conjunction with an appropriate monitoring regime is likely to reduce the risk to an acceptable level, although some level of complaints may continue given the unpleasant hedonic tone of residual odour from certain activities..</p> <p>Duncan Backshall, Andrew Curtis and Jenny Simpson indicated that this agreement is caveated on the resolution of what measures are implemented and when.</p>		
10.	<p>Whether there are additional mitigation measures that could be implemented that would further reduce the risk of off-site odours being considered offensive or objectionable.</p>	<p>At this stage we consider that it is appropriate to focus the mitigation on the main odour sources, and appropriately implementing the proposed mitigation.</p> <p>If there is still an issue with odour once these measures have been</p>		

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		implemented, then we consider that it would be appropriate to have a comprehensive review of the remaining sources.		
11.	Whether there are monitoring techniques which could be implemented to provide early warning of odours.	We are not aware of any practical early warning systems. However being cognisant of weather conditions when undertaking high odour risk activities is important.		
12.	If mitigation measures are successful in reducing odour to less than offensive and objectionable after the production increases to 200 tonnes, how will this be affected by the increase to 500 tonnes?	We cannot be certain at this time whether there will be additional issues at the higher production rate, as this will depend on the effectiveness of the mitigation implemented earlier. A staged approach to increases in production in conjunction with an appropriately designed monitoring regime would manage the uncertainty.		
13.	What weight can be applied to the complaint data	We agreed that the data available since December 2015 provides an indication of community		

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		dissatisfaction, but because no incidents were investigated and there is no record of locations or number of complainants it is of limited value in understanding the extent of impacts.		