

**From:** [HBRC](#)  
**To:** [Michaela Tinker](#)  
**Cc:** [Anita Anderson](#); [Sven.Exeter@mottmac.com](mailto:Sven.Exeter@mottmac.com)  
**Subject:** HBRC - Ravensdown notified consent [#6]  
**Date:** Thursday, 17 February 2022 2:37:33 pm

Please confirm your submission relates to application number APP-126684 Yes

Person Making the Submission \* Duncan Darroch

Associated Organisation (of applicable) Taradale High School

Address \*  15 Mill Rd Clive  
Hastings 4102  
New Zealand

Phone Number \* 02102587832

Email \* [duncan.darroch@gmail.com](mailto:duncan.darroch@gmail.com)

Are you a trade competitor for the purposes of section 308B of the RMA 1991 \* No

IF YES: Are you directly affected by an effect of the proposed activity that adversely effects the environment and does not relate to, or the effects of trade competition \* No

\* I/We oppose the above application

The specific parts of the application that my submission relates to are (please enter the relevant number) To discharge contaminants into water

My submission is: (you may attach submission detail to this form)

\* Include the reasons for your views

I am a local high school science teacher speaking on behalf of myself and a group of students who have been involved throughout 2021 in a Project examine the issue of discharge by Ravensdown.

Through this process, I have twice daily ridden my bike past the affected areas commuting to work. I have collected photographic and video documentary evidence of the discharge to the river and the settling pond. The evidence I have shows very clearly, discharge with bright green/yellow colouration and high sediment loading. In addition this discharge is occurring into a low tide environment at very high volumes. I have recorded wildlife in the settling pond using it as a feeding site.

I have also received and can present to the hearing environmental reports prepared by consultants Mitchell and Daysh. In the report dated 15 Dec 2020 assessing environment impacts of the air discharge in section B page 5 it reads "The existing 'Den' scrubbing system extracts concentrated emissions from the acidulation Den where ground phosphate rock and concentrated sulphuric acid are reacted to produce superphosphate fertiliser. The Den scrubbing system controls concentrated

fluoride emissions using a multistage wet scrubber system"

This concentrated fluoride is of incredible concern as a potential impact on the environment. As this resource consent application requests "To discharge treated stormwater and process water and associated contaminants from a sulphuric acid and fertiliser manufacturing plant " this includes the fluoride from the den scrubbers.

In addition page 15 notes

"The reason for the note about removal of the soils from the site is that the sampling identified that the soil includes heavy metals above background levels for Hawke's Bay, particularly in regard to cadmium which is associated with superphosphate".

This is incredibly concerning for the environment as heavy metals are able to Bio accumulate in the food chain. As I'm certain your committee is aware, the local aquatic environment is host to traditional and current food gathering (white bait, set nets, surf casting, eeling).

I have also documented with photos, yellow sulfur and white superphosphate contamination across the hard surfaces of the site. This highly concentrated material is feed into bunding and then too the settling pond. Some areas, such as the sulfur area do not have effective containment mechanisms and it goes straight into storm water and into the ground. This highly concentrated material is of huge concern to the environment.

To continue to allow this site to discharge into the river is an antiquated and abhorrent solution. Dilution is not the solution to pollution. Even granting consent to discharge into land only passes on the problem to the future as the contaminants will leache into the water table and the land will accumulate cadmium and other metals. Once ground conditions reach saturation point, the water will simply run off into drainage ditches and into the river.

Other options must be investigated. The water should be cleaned to NZ best practice drinking/river water standards before being discharged. If this isn't possible, it should be cleaned and sent through the NCC sewage pipeline out to deep ocean water. Pumping it out into the river or into land then there river is simply untenable.

In summary, as an affected local resident who witnesses this on daily basis (10 times a week) and as a school teacher representing the next generation of Hawke's Bay residents, I strongly oppose the granting of this resource consent.

Kind regards

Duncan Darroch

I seek the following decision from the Hawke's Bay Regional Council:  
\* Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought

Reject all aspects relating to the discharge of water into the river and on to land

I wish to be heard in support of my submission \*

Yes

If others make a similar submission, I will consider presenting a joint case with them at the hearing \*

Yes

I wish to attend any pre-hearing meeting that may be convened. \*

No

Attach a File



[ravensdown\\_new\\_stack\\_app\\_amended\\_15\\_dec\\_20.pdf](#)

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