



TOI TE ORA PUBLIC HEALTH

Bay of Plenty + Lakes Districts

Toi Te Ora Public Health
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18 June 2021

Bay of Plenty Regional Council
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Submission to Resource Consent Application RM20-0462 – Zivi Limited

Introduction

This submission has been prepared by the Medical Officer of Health at Toi Te Ora Public Health (Toi Te Ora) which is the Public Health Unit for Bay of Plenty and Lakes District Health Boards. The key role of Toi Te Ora is to promote, protect and improve population health, prevent ill health and minimise the risk of disease and injury through population-based interventions.

District Health Boards are required by the Public Health and Disability Act 2000 to improve, promote, and protect the health of people and communities; to promote the inclusion and participation in society and independence of people with disabilities; and to reduce health disparities by improving health outcomes for Māori and other population groups.

Toi Te Ora represents a relevant aspect of the public interest. Medical Officers of Health also have an interest in this resource consent that is greater than the interest of the general public. This is because Medical Officers of Health have responsibilities to reduce conditions within their local community which are likely to cause disease. In part this is undertaken by assisting Councils with their responsibilities pursuant to the Resource Management Act to address the improvement, protection and promotion of public health.

This submission aims to provide helpful, objective and independent input to promote the reduction of adverse effects on the environment and protect the health of people living in, and visiting, the local community. The Medical Officer of Health could not gain an advantage in trade competition through this submission.

The Medical Officer of Health wishes to be heard in support of this submission and would not be prepared to consider presenting a joint case with others who make a similar submission.

Submission Points

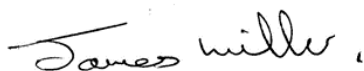
- Health is a state of complete physical, mental, social, and spiritual wellbeing. It is not merely the absence of disease or injury. Clean air is a basic requirement for human health and wellbeing.
- Odour from processing offal and meat by its very nature is likely to be offensive. Exposure to ongoing longstanding offensive odour is likely to impact on health and wellbeing.
- Between October 2019 and May 2020, 8 months, there have been 400 complaints about objectionable and offensive odour associated with Ziwi's activity. Since then and following the instalment of odour management measures, complaints continue to be received at a similar rate. This level of complaint indicates that people are finding odour from the company's activity a concern which could indeed be a nuisance, and that it is having an adverse impact on the public wellbeing.
- I acknowledge Ziwi Limited ("Ziwi") is a significant business in the Bay of Plenty and its ability to successfully continue its operation is important.
- Regional Council following plan change 13 now has regulatory powers to require existing operators to obtain consent to discharge to air. In the past the Regional Council did not have all the regulatory tools to ensure that industry take measures to eliminate or significantly reduce the release of offensive odours associated with its activities.

From the information provided to me, I'm not satisfied that the operation is reducing potentially objectionable odour to an acceptable degree. Therefore, the discharge of contaminants to air from this operation could be a nuisance adversely impacting on the public health and wellbeing.

I do not, therefore, support the Ziwi application in its current form. I would support Council granting consent to Ziwi to discharge contaminants to air provided there are adequate and effective conditions of consent that will protect the wellbeing of the public going forward.

The original application was for a consent of 20 years which I understand has been amended to 5 years. Should consent be approved I consider the 5-year period needs to include an early and significant review at 6 months to consider whether the consent can continue. For this to be the case, I would expect Ziwi must be able to demonstrate that it has taken steps to eliminate or substantially mitigate the discharge of offensive odours to the extent that the public health is protected.

Yours sincerely



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Medical Officer of Health

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