



# TOI TE ORA PUBLIC HEALTH

Bay of Plenty + Lakes Districts

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Toi Te Ora Public Health  
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19 October 2022

Bay of Plenty Regional Council  
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## **Submission to Resource Consent Application RM19-0557 – Alpine Export New Zealand**

### **Introduction**

Toi Te Ora Public Health (Toi Te Ora) is the public health service for the Bay of Plenty and Lakes districts, part of the National Public Health Service. Toi Te Ora has a purpose to improve, promote and protect the health of the Lakes and Bay of Plenty population with a focus on reducing inequalities in health.

Public health is about promoting wellbeing and preventing ill health.

Medical Officers of Health also have an interest in this resource consent that is greater than the interest of the 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.

Many of the crucial underlying factors that contribute to improving, promoting, and protecting the health of people and communities are directly influenced by the decisions and activities of councils.

Toi Te Ora could not gain an advantage in trade competition through this submission and by making this submission seeks to provide helpful, objective, and independent input to assist the consenting authority protect sensitive receiving environments<sup>1</sup> and human health<sup>2</sup>.

I acknowledge the Council officer's section 95 report, specifically the human health impacts that offensive odour has on the sensitive receptors near this activity.

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<sup>1</sup> Bay of Plenty Regional Natural Resources Plan, Purpose

<sup>2</sup> Bay of Plenty Regional Air Plan Objective

## Submission Points

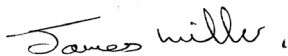
- Health is a state of complete physical, mental, social, and spiritual wellbeing. It is not merely the absence of disease or injury. Clean air is a basic requirement for human health and wellbeing.
- The sense of smell is important for ensuring health and wellbeing. The sensory system provides people with the opportunity to enjoy their environment and identify safe food. The detection of unpleasant or offensive odours alerts humans to harmful substances in the air, food, or water. Therefore, frequent exposure to unpleasant smells means people are regularly on alert.
- Odour produced in pet food manufacture is considered offensive. This means when odour from this activity, even at low levels, is smelt by the public it will be offensive. Odour that is likely to be offensive is a nuisance.
- Over 1200 complaints have been reported to Council over 7 years. After the most recent odour mitigation measures was attempted, we note that there are still complaints being reported to Council, with 29 received in May 2022, over a 19-day period.
- The operation has not managed odour to an acceptable level. This is evident from the substantial length of time the community has endured offensive odours and that complaints are still being reported. Therefore, I consider that the duration of consent sought to be unreasonable.
- Prior to this consent being notified, Toi Te Ora was unaware of the odour issues related to this activity. However now that I am aware, I support Council in using the regulatory tools now available to manage this type of discharge.

I oppose Alpine Export's application.

I am willing to participate in a formal prehearing with the consent authority and applicant to discuss 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.

Yours faithfully



**Dr Jim Miller**  
Medical Officer of Health

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