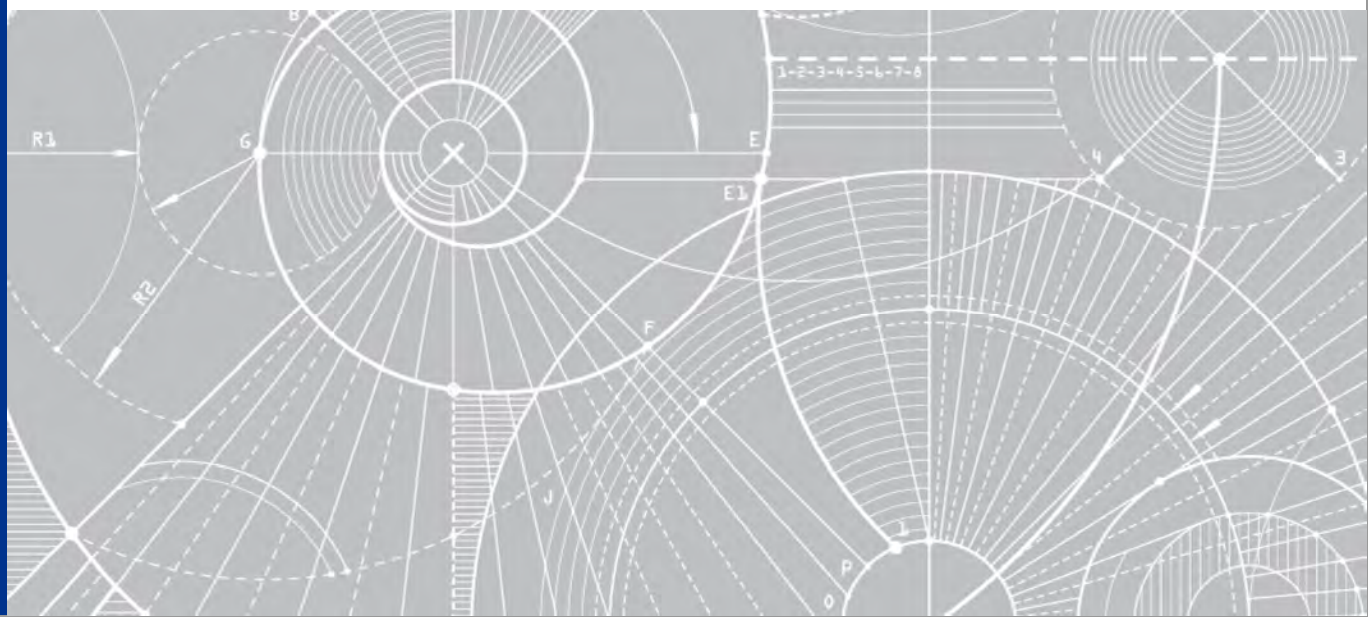
Taha Fertilizer Industries Limited

APPLICATION FOR LAND USE CONSENT AND ASSESSMENT OF ENVIRONMENTAL EFFECTS

REV 02

11 March 2015



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Revision	Date	Description	By	Review	Approved
0	17 September 2014	Draft for technical review	Tess Drewitt	Phil Heffernan	18/09/2014
0	23 September 2014	PD Review	Tess Drewitt	Nic Conland	23/09/2014
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2.1	11 March 2015	PD review for release			

Contents

EXECUTIVE SUMMARY

Taha Fertilizer Industries Limited (Taha) is applying for retrospective resource consent to store up to 10,000 tonnes (T) of Ouvea Premix and 8 T of ammonia sulphate at its storage facility on Kana Street in Mataura. Resource consents are required under the Gore District Plan for the storage of Class 6 and 9 hazardous substances above the quantities permitted in the Industrial Zone and for minor traffic non-compliances.

The actual and potential environmental effects of this proposal have been assessed in accordance with Schedule Four of the Resource Management Act 1991 (RMA). Table 1 provides a summary of the actual or potential effects, the proposed mitigation measures and the environmental assessment.

Table 1. Summary of Assessment of Environmental Effects

Actual or potential environmental effect	Mitigating factors / proposed measures	Reference	Assessment
Storage of Ouvea Premix, particularly Ouvea Premix coming into contact with water and producing ammonia gas or entering the water way	• Any ammonia emissions expected to be low and fugitive in nature given the slow production of ammonia and the low likelihood of Ouvea Premix coming into contact with water. • Flood protection measures, including flood wall, flood guards, water tightening work on the building. • Flood Response Plan in a flood event, including securing the building, sand bagging. • Secondary measures, including double layer heavy duty bags with mesh-woven outside layer and plastic lining, as well as strategic bag placement. • Materials stored in mesh-woven plastic lined heavy duty bags • Site kept in orderly state and fully secure.	AEE section 5.2; Environmental Management Plan; Emergency Spill Response Kit.	Less than minor
Nusiance (dust, odour and noise)	• Minimal dust, odour or noise nuisance expected. • Complaints procedure in place for residents if required.	AEE section 5.3; complaints response procedure	Less than minor.
Traffic effects	• Effects mitigated through off-road parking and loading areas. • NZTA has provided written approval for activities on a state highway.	AEE section 5.4	Less than minor.
Effects on visual amenity	• Activity located in existing buildings so visual effects will be negligible.	AEE section 5.5	Less than minor.

Overall, the actual and potential environmental effects of the proposal have been assessed as less than minor. However, on request by the Gore District Council (GDC), Taha has engaged a suitably qualified environmental professional to conduct an environmental risk assessment to confirm this assessment. Taha intends to provide a final report to GDC in April. GDC, NZTA, Environment Southland and various members of the community have been consulted with regarding this application.

PART A: RESOURCE CONSENT APPLICATION

To: Resource Consents Officer

Address: Gore District Council
PO Box 8
Gore 9740

Consent Application Form

Application by Taha Fertilizer Industries Limited

Taha Fertilizer Industries Limited (on behalf of Taha Asia Pacific Industries Limited and Taha Fertilizer Industries Limited) requires land use consent under section 9 of the Resource Management Act 1991 (RMA), informed by (but not limited to) the following Gore District Plan provisions:

- Rule 5.9.4 – A land use activity not complying with the off-street parking requirements for industrial activities.
- Rule 6.9(2) – Storage of Class 6 and 9 hazardous substances above the amount permitted by Rule 6.9(1)

The land use consent applied for is for a **restricted discretionary activity.**

Name and address of the owner and occupier (other than the applicant) of land to which the application relates to:

Taha Fertilizer Industries Limited and Taha Asia Pacific Industries Limited lease the property from Gregory John Patterson and Douglas James Harvey, who are the property owners.

Location of proposed activity:

The proposed activity is located at 109 and 116-130 Kana Street, Mataura, Gore.

The sites are legally described as:

- Section 6-8 and 10, Part Section 9 and 11, Section 12 and Closed Road, of Block I Town of Mataura Bridge;
- Section 4, 5 Block XVI Town of Mataura Bridge; and
- Lot 1 and Part Lot 2 DP 147

The Certificates of Title for these sites (SL7/126, SL8/135, SL23/898, SL41/253 and SL14/4175) are provided in Appendix A.

Attached, in accordance with the fourth schedule of the Resource Management Act 1991, is an assessment of environmental effects in the detail that corresponds with the scale and significance of the effects that the proposed activity may have on the environment.

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PART B: ASSESSMENT OF ENVIRONMENTAL EFFECTS

1. Introduction

This report is an Assessment of Environmental Effects (AEE) prepared in accordance with the requirements of the Resource Management Act 1991 (RMA), in particular Schedule Four. It has been prepared by Jacobs New Zealand Limited (Jacobs) in support of a retrospective resource consent application by Taha Fertilizer Industries Limited (Taha) to store class 6 and 9 hazardous substances above the threshold permitted in the District Plan for industrial areas and for minor traffic non-compliances.

The site for this activity is located across various sites on Kana Street in Mataura in the Gore District.

2. Site location and description

2.1 Site Description

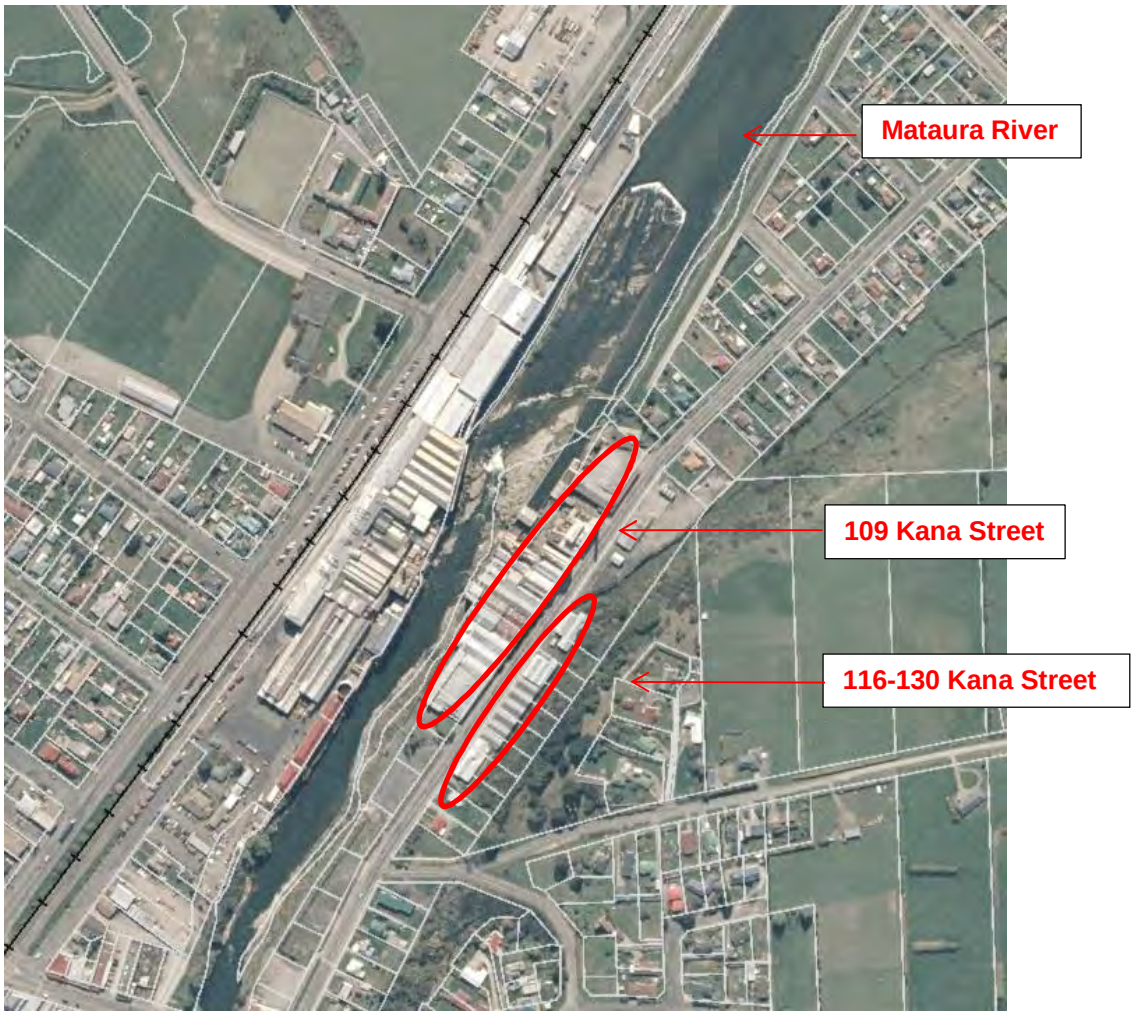
Taha is seeking resource consent to store materials in a cluster of existing buildings on Kana Street in Mataura. Mataura is a small town in the Southland Region of New Zealand, approximately 13 kilometres south-west of Gore and 53 kilometres north-west of Invercargill.

The buildings are significant in Mataura and used to house the old Mataura paper mill. The buildings have the street address 109 and 116-130 Kana Street, and the sites are legally described as:

- Section 6-8 and 10, Part Section 9 and 11, Section 12 and Closed Road, of Block I Town of Mataura Bridge;
- Section 4, 5 Block XVI Town of Mataura Bridge; and
- Lot 1 and Part Lot 2 DP 147

The Certificates of Title for these sites are provided in Appendix A. Figure 1 shows the site location, and detailed site layout plans are provided in Appendix B.

Figure 1 : Site location



The western buildings (109 Kana Street) are located next to the regionally significant Mataura River, which runs approximately 190 kilometres from the Eyre Mountains to the Pacific Ocean on the southern coast of the South

Island. A small channel, known as Waikana Stream, also runs alongside the northern part 116-130 Kana Street before crossing under the road through a culvert and running alongside the southern part of 109 Kana Street, then running through a culvert under the building and into the Mataura River.

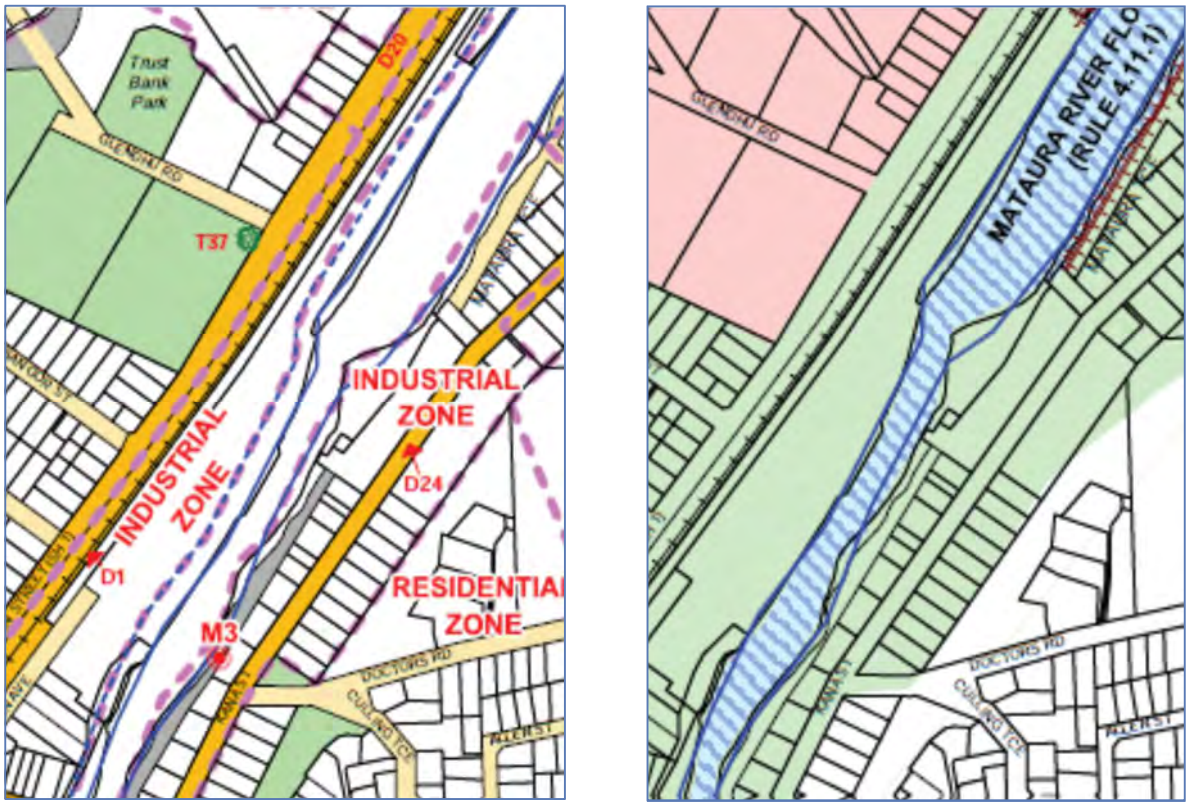
All sites are accessed directly off Kana Street, which is one of the main roads through Mataura. There are two parking areas – one located around the east office buildings at 116-130 Kana Street, and the other located to the south of 109 Kana Street. The southern parking area is a large gravel parking lot, while the office parking area is specifically designated for staff parking.

2.2 Location and zoning

The zoning of the site under the Gore District Plan (District Plan) has two main characteristics:

(1) The site is located in the Industrial Zone on Planning Maps MAT-03. The District Plan identifies the industrial zone as an area with higher levels of noise, lighting, heavy vehicle movements, bulk storage of hazardous substances and larger buildings than other parts of the District. As such, the site is located in an area specifically zoned for this type of activity.

(2) The site is also located within an area identified in the planning maps as potentially flood prone from the Mataura River in floods larger than that of 1978, or a stopbank breach in smaller floods (highlighted in lime green in Figure 2). The overlay does not restrict the ability of people to obtain resource consents in this area. Figure 2 : District Planning and Hazard Maps showing site and surrounding features (MAT-03)



The eastern buildings (116-130 Kana Street) are adjacent to the residential zone boundary to the east. The buildings are separated from the residential zone by a bush/shrub area approximately 40-50 metres wide, with the nearest house approximately 60 metres to the east.

Kana Street is also State Highway 93 (Designation 24 in the District Planning Maps). It branches off from State Highway 1 approximately 400 metres south of the site on the other side of Mataura River. The nearest major intersection to the site is the intersection with Kana Street and Doctors Road, approximately 200 meters south of the site.

There are a number of other notable landmarks near the site, including:

- A traditional lamprey collecting area, which is approximately 200 metres south of the site along the Mataura River.
- Mataura school, which is approximately 500 metres south-west of the site, separated by the Mataura township and the Mataura River.
- Mataura Medical Centre, which is approximately 500 metres south-west of the site on Bridge Street.
- The Trust Bank Park, which is west from the site across the Mataura River.

2.3 Flood history

The Mataura township, and in particular the areas of land next to the Mataura River, is subject to a history of floods, with the largest known flood occurring in 1978. As such, the Gore District Council has included an overlay in the planning maps to show the parts of Mataura, including where the site is located, that are prone to flooding. Under the District Plan, all resource consents for activities within this area will be referred to Environment Southland.

We have discussed this consent application with Environment Southland, who has provided further detail of the flood history, how flooding has affected the project site and any subsequent flood mitigation measures that have been employed on the site. This information is provided in Table 1. In addition, Environment Southland also maintains flood alleviation works in Mataura, upstream of the project site, and a flood warning system and website.

Table 2 : Flood history at Kana Street site (source: Environment Southland)

Year	Return period	Estimated AEP	Description	Subsequent works on site
1913	Unknown	Unknown	Unknown, but thought to have been smaller than the 1978 flood.	Unknown
1978	50-60 years	~2 %	Largest known flood. Buildings on the west side of Kana Street were flooded to a depth of 1.5-1.8 meters. Flood depth is recorded on the former tool wall in the building.	Unknown
1980	25 years	4 %	Fourth largest known flood. Buildings on the west side of Kana Street were flooded to a depth of 1.5-1.8 meters. Flood depth is recorded on the former tool wall in the building.	ES upgraded flood alleviation works upstream of paper mill site. At the paper mill site, the owners of the time: • erected a new flood wall, • fitted non return valves on various pipes that led to the river, • constructed various flood barriers that were put in place when a flood threatened, and • developed a flood contingency plan.
1987	Not provided	-	Second largest known flood. No significant flood damage to the buildings as a result of flood protection measures.	Nil.
1999	Not provided	-	Third largest known flood. No significant flood damage to the buildings as a result of flood protection measures.	Nil.

The flood protection measures installed are still in place and are shown in the site layout plans provided in Appendix D. Based on the information provided in Table 2, the probability of a flood the size of the 1978 flood occurring in any given year is around 2%. Note that Taha has engaged flood modellers to further assess the likelihood of the building flooding in extreme events. This information will be provided to GDC as part of an additional risk assessment once complete.

2.4 Building suitability

The cluster of buildings that Taha is using to store materials used to house the old Mataura paper mill until 2000. The buildings have however now been vacant since 2002. The building owner (Greg Paterson) has recently undertaken a range of repair works on the building to ensure it is still suitable for industrial activities, including Taha's storage activities. These works include:

- Re-guttering and extensive roof maintenance, including re-routing internal guttering, installing extra downpipes to safeguard from overflows that may occur in high rainfall events, and re-lining gutters with waterproof membranes;
- Undertaking works to recommission and add safety mechanisms to the fire sprinkler system so that it would be suitable for Taha's hazardous substance storage
- Covering internal water races with concrete over reinforced steel to prevent water ingress into the building;
- Waikana Stream maintenance, including clearing the stream of debris after rain events; and
- Re-digging the ditch behind the eastern building to enable free draining of water.

Mr Paterson has also consulted with a structural engineer who assessed the buildings as structurally fit for purpose, a fire consultant regarding the fire safety of the building, and a fire sprinkler engineer. A final building report will be developed as part of the risk assessment and submitted to GDC once complete.

2.5 Contamination

The site is a contaminated site and the Gore District Council has advised that it is HAIL listed. The known contaminants registered against this site on the HAIL list are:

- storage tanks (which may still be in the ground on the site),
- liquid fuels, and
- chemical waste.

3. Project Description

The following section outlines the project description, and should be read in conjunction with the site layout plan provided in Appendix B of this report.

3.1 Activity description

Taha has developed an aluminium recovery and recycling process on the property of the existing NZAS Smelter. One of the outputs of the process is Ouvea Premix, which has multiple industrial uses including fertiliser, refractory, cement additive, asphalt additive, paint additive and others. Ouvea Premix is made up of approximately 30% aluminium oxide, 30% aluminium nitride and 30% magnesium aluminate. Other components include aluminium fines, sodium and calcium salts, and other trace metals.

Taha currently stores the Ouvea Premix in a number of sites in Invercargill and at the Mataura site. Taha is in the process of identifying a production site where the Ouvea Premix can be converted into a compound fertiliser through a granulation process. Taha proposes to continue to store the Ouvea Premix and other materials at the various storage sites until a suitable site is secured. Taha expects all material to be removed from the site for processing within 2 years.

Taha staff will not be permanently located at the site while it is used for storage. Rather, staff from Invercargill will undertake regular storage checks. While material is being removed from the site, Taha staff will be present provide truck access and load material.

3.2 Storage of hazardous substances

Ouvea Premix, which is a class 6 and 9 hazardous substance, is currently stored at the Mataura site in the buildings marked A, B, C and D in the site layout plan in Appendix B. Table 2 provides a description of the hazardous substances and quantities stored on site.

Table 3 : Hazardous substances stored onsite

Product name	Description	Max volume	Storage type	Spill prevention	HSNO class
Ouvea Premix	Granular/ powder	9,951 T	1-tonne double layer heavy duty bags with mesh-woven outside layer and plastic lining.	Stored indoors to prevent contact with moisture. Temperature will be controlled and is not to exceed 50ºC.	6.3A; 6.4A; 9.1C
Sulphate of Ammonia	Granular/ Powder	8 T	1-tonne double layer heavy duty bags with mesh-woven outside layer and plastic lining.	Stored indoors to prevent contact with moisture. Temperature will be controlled and is not to exceed 50ºC.	6.1D, 9.1D, 9.3C
Diesel	Liquid	100 litres	20 litre diesel drums	Stored indoors, temperature will be controlled and is not to exceed 50ºC.	3.1D, 6.1E, 6.3B, 6.7B, 9.1B.
Citric Acid	Powdered Crystals	350 kg	25kg woven mesh bags	Stored in closed container indoors to prevent contact with moisture. Temperature will be controlled and is not to exceed 50ºC.	6.1E, 6.3B, 8.3A.
Silica Sand	Fine powder	150 T	1-tonne forklift bags	Not hazardous, shovel and wheelbarrow. Return to stock pile if uncontaminated.	Not hazardous

3.3 Transportation of materials

Taha does not intend to store any additional materials at the site. As such, there will be no further inward truck movements for unloading materials. However, Taha proposes to remove the material from the site once the processing site is fully operational and within 2 years of the resource consent being granted. Taha anticipates an average of 1-2 trucks in and out of the site per day to remove the material over this time. Access to the site will occur between 9am – 5pm weekdays only (unless access is necessary as part of Taha's incident response procedure).

The site has existing truck access off Kana Street, which will be used for removing the materials. The 109 Kana Street site has three main site access points, as indicated in the site layout plan in Appendix B:

- South-end access, which is external to the building and has an off-road loading area and truck turning bay.
- Road-side access, which enables trucks to enter the building for internal loading and manoeuvring inside the building to exit in a forward motion.
- Northern access, which provides off road access to the site marked "Ouvea Premix store D" in the site layout plan.

The 116-130 Kana Street site (marked "Ouvea Premix store A" on the site layout plan) has one access area at the north of the building. Trucks access this site by pulling off the road at the north of the building, before being off-loaded by a forklift.

Where required, bulk storage bags will be transported around the site using a forklift.

3.4 Parking

There is sufficient onsite parking for Taha's storage activities. The site has two main parking areas – one to the north and south of the area marked "office" on the site layout plans, and a large yard to the south of 109 Kana Street. There are no other parties using the complex, so there is no competition for these car parks. Also, there will be no FTE's on site requiring parking, other than temporary parking for staff conducting the regular storage checks.

4. Resource Consent Requirements

4.1 Activity table

The activity has been assessed against the provisions of the Gore District Plan Chapters 2 (matters of national importance), 4 (land use activity rules); 4A (natural hazards); 5 (transportation) and 6 (hazardous substances). Table 3 summarises the resource consent requirements for the activity under the District Plan. A full list of the permitted standards that will be met is provided in Appendix C.

Table 4 : Resource consent requirements

Rule	Explanation	Assessment	Status of proposal
5.9.2, 5.9.4	Off-road parking requirements for industrial activities: • One car park per 50m^2 GFA for first 200m^2, then one car park per every additional 200m^2, and • An area for loading/unloading of goods onsite for any activity in excess of 1000m^2, • Parking design complying with appropriate dimensions; • Identify spaces for staff parking; and • For more than 5 cars: o For every 20m^2 of parking, 1m^2 of landscaping either trees or shrubs shall be provided o Onsite manoeuvring shall be provided to ensure no vehicle is required to reverse onto or off any arterial road o Stormwater shall be contained and treated o Surface of car park area and accesses shall be maintained to a dust free standard and to avoid tracking loser materials on public roads o Clearly defined access to parking areas with a physical barrier separating road from parking area. o Provide onsite manoeuvring 90 percentile car.	Total GFA of buildings on site approximately 10,400m^2, equating to a requirement for approximately 55 car parks. There are several car parks provided that come with the lease of the office. There is also a large yard that can be used for car parking if required, but this area may come shy of the required 45 additional parks. The main parking area is not screened and stormwater is not collected.	Restricted discretionary
6.9(2)	Storage of hazardous substances above permitted limits, being: • 1000kg (Class 6) • 5000kg (Class 9)	Storage limits will be exceeded, as indicated in Table 2 in section 3 of this report.	Restricted Discretionary

4.2 Consent sought

The following resource consent is sought:

- Consent for a **restricted discretionary activity** pursuant to Rule 4.6.9(2) for the storage of Class 6 and 9 hazardous substances above the permitted storage limits.
- Consent for a **restricted discretionary activity** pursuant to Rule 5.9.4 for a land use activity that does not comply with the off-street parking requirements for an industrial activity.

Note that there are no specific rules restricting the storage of hazardous substances in areas shown as “subject to actual or potential inundation” on the District Plan Maps - rather, Policy 4A.4(4) applies. An assessment against this policy is provided in section 7 of this report.

4.3 National Environmental Standard for Managing Contaminants in Soil and their Effect on Human Health

The National Environmental Standard for Managing Contaminants in Soil and their Effect on Human Health (NES) applies to the following activities on a Hazardous Activities and Industries List (HAIL) site:

- Soil disturbance above permitted levels,
- Change of land use,
- Subdivision, and
- Removal of fuel storage tanks.

There will be no soil disturbance associated with the proposed works. Additionally, the site is zoned and has been used for industrial purposes. As the proposed activity is also industrial, there is no change in land use. As such, the NES is not triggered for this activity.

5. Assessment of Environmental Effects

Pursuant to Schedule Four of the Resource Management Act 1991 (RMA), the following assessment is provided on the actual and potential effects that can be reasonably expected from the proposed activity.

5.1 Matters for assessment

Section 6.10 of the District Plan outlines information requirements for hazardous substances resource consent applications, including containment protocols, site security, emergency response plans and monitoring systems. These requirements are addressed in this section. Additional information requirements, including the location of storage and surrounding activities is provided in section 2 of this report.

The storage of hazardous substances and industrial activities that do not comply with off-street parking requirements are Restricted Discretionary Activities, and therefore all relevant matters are assessed. Section 5.9.5 of the District Plan outlines information requirements for off-site parking resource consent applications. The following information requirements are relevant for this Assessment of Environmental Effects (AEE) and will be addressed in section 5.5 of this report:

- Assessment of the impacts of changes in traffic volumes on the adjoining road(s), including any required upgrading and consequential impacts on the roading network.
- Details relating to parking areas, including hours of parking, design and layout, nature of traffic generation, containment and treatment of stormwater, visual screening and existing and proposed signage.
- An assessment of the traffic effects and loading facilities, particularly with regard to the safety of road users and other pedestrians, and a record of consultation with the New Zealand Transport Agency (NZTA).
- Provision for on-site manoeuvring so that vehicles can enter and exit the site in a forward direction.
- The extent to which access, sight distance, clearance from intersections and minimum spacing complies with minimum requirements, including those specified in the Gore District Council Subdivision and Development Bylaw 2011.

5.2 Storage of Ouvea Premix

5.2.1 About Ouvea Premix

Ouvea Premix is a dry, granular substance, which is an output of the aluminium recovery and recycling process. Ouvea Premix is made up of approximately 30% aluminium oxide, 30% aluminium nitride and 30% magnesium aluminate. Other components include aluminium fines, sodium and calcium salts, and other trace metals. The storage of Ouvea Premix at the Mataura site has the potential to cause environmental effects should the Ouvea Premix mix with water and produce ammonia and hydrogen gas, or the material enter the water course.

5.2.2 Ouvea Premix Reaction with Water

In general, if Ouvea Premix comes into contact with water, the aluminium nitride (AlN) in the material may be degraded (hydrolysed) by water through a series of reactions resulting in the formation of ammonia. In normal circumstances, conversion of aluminium nitride to ammonia is dependent on temperature, the availability of water, and any mechanical processing that may agitate the material and allow a faster rate of hydrolysis. At room temperature, the aluminium nitride particles become coated by a thin shell of aluminium hydroxide and aluminium oxide, which causes the hydrolysis to stop before completion. This shell acts as a hydrophobic coating, which prevents further reaction of the AlN with water, even when the particles are submerged.[1]

[1] S. Fukumoto, T. Hookabe, and H. Tsubakino, *Hydrolysis behaviour of aluminium nitride in various solutions*, Journal of Materials Science **35** (2000) 2743-2748.

On a conservative mass balance basis, reaction of aluminium nitride in Ouvea Premix may generate up to 150 kg of ammonia per tonne of material, which requires up to 300 litres of water per tonne. However, in practice, the ammonia is formed at a very slow rate, with the hydrolysis reaction occurring over a period of days to years. For example, analysis of aluminium dross recovered from the NZAS landfill site has shown that material stored for up to 40 years still contains unhydrolysed aluminium nitride. Any ammonia formed will generally remain in the product due to the high solubility of ammonia in water as aqueous ammonium hydroxide and will not be released as ammonia gas. Any fugitive gas emissions would be detected as an odour.

In addition to the production of ammonia described above, the AIN is heat releasing (exothermal), such that localised heating of the Ouvea Premix occurs. Depending on the amount of water the Ouvea Premix is exposed to; the release of ammonia will dissolve in the water, coating the solid particles and turning the localised matrix alkaline (i.e. to a pH greater than 9). Under the conditions of localised heating and alkaline pH, a secondary reaction starts where tiny, high surface area particles of aluminium metal react with the now alkaline, localised, water conditions to produce small amounts of Hydrogen (H_2), gas. This metal catalysed fission of water, which gives hydrogen gas, is also exothermal and produces more heat.

Hydrogen is not a toxic gas. The formation of hydrogen gas that occurs in individual heavy duty bags is expected to be extremely low given the small localised reactions. Any gas that is released outside the bags will rapidly disperse through building ventilation. Hydrogen only becomes a problem if allowed to accumulate in significant volumes in confined spaces, which is extremely unlikely to occur in these conditions.

5.2.3 Ouvea Premix in waterways

Un-bagged Ouvea Premix could cause environmental effects if it enters the water way through spillage or flood waters encountering loose materials. In these circumstances, the reaction of water with Ouvea Premix would be the same as the reaction described above, with the aqueous ammonium hydroxide being released in the water and hydrogen gas being released into the air. The ammonium hydroxide will likely stay in the product and hydrogen gas will release and disperse such that it will not be detectable.

5.2.4 Mitigation measures

Taha has employed measures to avoid Ouvea Premix coming into contact with water or entering waterways. These measures focus on preventing, minimising and managing:

(1) Spillage in circumstances where the material leaves the building and enters the Mataura River or stormwater network;

(2) Flooding; and/or

(3) Leaks or general dampness in the building.

<u>Spillage</u>

Taha takes a preventative approach to spills, ensuring first and foremost that all necessary actions are taken to prevent spills from occurring. Preventative actions include:

- taking particular care when handling hazardous substances;
- storing all hazardous substances in new, purpose built, heavy duty 1 tonne bags double lined bags with mesh-woven outers and plastic liners, which are designed for forklifting and will minimise the chance of spills during storage and handling;
- ensuring building where substances are stored and where most of the loading will occur are fully secure and contain HSNO signage at the entrance to indicate the presence of hazardous substances onsite; and
- keeping the site in a tidy and orderly state, and ensuring all staff are trained in how to handle hazardous substances to avoid spillage.

In the event of a spillage, staff will initiate the incident response procedure, which is detailed in the EMP. Ensuring hazardous substances are contained and do not enter watercourses following a spill is crucial. In particular:

- Staff take special care to ensure substances do not enter Waikawa Stream, including closing and sandbagging nearby doors after a spill has occurred to avoid contamination.
- The potential for hazardous substances to enter the stormwater network is minimal as downpipes running through the building are enclosed (a mark-up showing the indicative stormwater drainage channels and pipes is provided in Appendix B).
- The internal water races have been covered by concrete over reinforced steel to avoid any material entering the Mataura River in a spill.

All material that is involved in a spill will be collected using onsite spill kits, contained and returned to storage if useable. If not useable, it will be downgraded into a different fertiliser product. As a result, any spillage that does occur will not result in hazardous waste being produced. The EMP further details how to use the onsite spill kits, including use of PPE.

Flooding

Taha has a two-tiered approach to preventing flood water from mixing with Ouvea Premix and to ensure Ouvea Premix does not enter the waterway in a flooding event. Primarily, the buildings have a number of mechanisms to prevent water ingress in a large scale flood (and subsequent egress of water and product), including many mechanisms that were successful in preventing water entering the buildings in previous floods. These mechanisms include:

- a flood water retaining wall along the majority of the north-western boundary of 109 Kana Street with the Mataura River, built to withstand 600 mm above the highest recorded flood;
- bolt on steel and concrete shutters attached to doors to prevent ingress of water, also built to withstand 600 mm above the highest recorded flood;
- all unused piping has been sealed and other essential stormwater piping have one-way valves installed to prevent the ingress of water;
- the internal water races have been covered by concrete over reinforced steel to prevent water from the Mataura River entering the building;
- Waikawa Stream is checked and cleared regularly to enable free drainage;
- the open drainage channel to the east of 116-130 Kana Street building is checked and cleaned 6-monthly to prevent surface flooding; and
- silica sandbags are stored on site to be used as emergency sand bagging in conjunction with polythene.

Secondly, in the unlikely event that water does enter the building in a flood (i.e. a flood higher than the largest recorded flood), Taha has employed additional defences, including:

- all hazardous substances are stored in double layer heavy duty bags with mesh-woven outside layer and plastic lining, which would be difficult to breach in the event of a flood;
- the lower levels of the buildings on 109 Kana Street next to the Mataura River will not be used at all; and
- hazardous substances adjacent to the eastern side doorway of 116-130 Kana Street are stored on pallets to prevent any contact with surface flooding off the adjacent bank.

In the event of a flood, the Flood Protection Plan, which is detailed in the EMP, will be initiated. The Flood Protection Plan, including all flood protection measures, are checked 6-monthly to ensure it is still fit-for-purpose. Where necessary, this check will involve a “flood drill” and run-through of flood measures to ensure it can be done effectively and within good time. The 6-monthly check sheet is attached to Appendix D.

Other water contact

The Ouvea Premix could come into contact with water through other means, such as dampness, drips or humidity, or during loading, which could result in negative environmental effects. The aluminium oxide in the material is a desiccant material in its own right, meaning it will naturally absorb water from the air into its

microscopic structure and result in the reaction discussed in section 5.2.2. This is particularly pronounced in humid conditions and can result in odour that may be detectable from neighbouring properties.

Taha has recently inspected the site for leaks and potential areas where water may enter the site. All identified leaks on the roof have been repaired. All external gutters have been cleared of debris and all internal pipes will be rerouted externally. In the event of leaks, dampness or high humidity, the possibility of this water breaching the plastic lined heavy duty bags in which substances are stored will be minimal.

Further, Taha will ensure that the truck companies involved with removing material from the site are well aware of the potential for contamination, and advise them to take care when loading trucks. In particular, truck drivers will be advised not to load externally to the building when it is raining.

5.2.5 Assessment

Given the low probability of a large flood occurring while Taha occupies the site, and the mitigation measures that are in place, it is considered highly unlikely that the Ouvea Premix would come into contact with water to the extent that harmful levels of ammonia gas or hydrogen gas will be produced, or that a harmful level of Ouvea Premix would enter the waterway. Even if water does come into contact with the product, any ammonia formed will generally remain in the product due to the high solubility of ammonia in water as aqueous ammonium hydroxide and hydrogen gas will rapidly disperse through the building's ventilation. Ammonia will generally not be released as ammonia gas, and any fugitive gas emissions would be detected as an odour.

The environmental effects associated with storing Ouvea Premix have therefore been assessed as less than minor.

5.3 Nuisance

The proposed activity could potentially cause nuisance effects to be generated on users of adjacent areas from dust, odour and noise, particularly for the neighbouring residential area. In summary:

- Dust may be discharged to air from the storage and handling of bulk materials. However, these activities will be controlled by material handling and storage protocols, including keeping the doors and windows closed during handling.
- Taha's storage activities may emit fugitive ammonia gas emissions from Ouvea Premix. However, as discussed, this may only occur where the product gets damp, which is considered unlikely. Any odour emissions produced will therefore be low.
- Trucks may generate noise that is audible by surrounding properties during loading. However, this noise will be no dissimilar to the noise currently experienced in the area given Kana Street is a main highway that is frequented by trucks.

Given the above, the potential for dust, odour and noise nuisance is minimal. In addition, the EMP details a complaints procedure, which will be followed in the instance where a dust, noise or odour complaint is received. Due to the industrial nature of the environment, the management procedures in place and the nature of the activity, adverse nuisance effects on the environment or any person are therefore considered to be less than minor.

5.4 Traffic Effects

Eventually, the hazardous substances will be transported from the site by trucks. Once the plant is fully operational, Taha expects an average of 1-2 trucks per day to remove the product over 2 years. This has the potential to impact on road traffic, especially as the site is located on a state highway.

The following factors mitigate the potential effects on traffic:

- The number of anticipated truck movements is not considered to have significant impacts on the flow of traffic or other users of the state highways. As such, an assessment of existing flows on the state highway and how the introduction of new truck movements will affect these flows has not been made.

- The site has existing car parks that will provide adequate parking for Taha's storage activities.
- The parking area at the southern end of 109 Kana Street is separated from the road by a physical barrier and is lined by bush and tree planting. Parking areas are far enough off the road to allow plenty of space for onsite manoeuvring and enable cars to enter and exit the highway in a forward direction. Unscreened parking areas are currently being used for parking.
- All loading and unloading areas for trucks are provided on site and are indicated in the site layout plans in Appendix B. The plans also show the areas for onsite manoeuvring, which enables the trucks to enter and exit the site in a forward direction causing minimal disruption to other road users. The access points are located on an area of straight road with at least 200 meters to the nearest intersection, and the trucks are able to exit the site in a forward direction, meaning drivers will have full visibility of other cars and pedestrians using the road.
- Taha has consulted with the New Zealand Transport Agency (NZTA) on the proposed activity and the potential impact on truck movements on the state highway. NZTA has signed an Affected Parties Approval form and does not have any concerns given the access is well-formed. The APA form is attached in Appendix F.
- Taha will be utilising the access points and loading areas that are already established on the site. As such, a full assessment of access against the requirements of the GDC Subdivision and Development Bylaw 2011 has not been made.

Overall, given the site access ways are already established, and loading/unloading areas are on-site with enough space for trucks to manoeuvre without affecting traffic flows, the traffic impacts that will be generated as a result of this activity are considered to be less than minor.

5.5 Effects on visual amenity

The storage facility will be located within existing buildings onsite. No additional buildings will be constructed. The location of the buildings does not trigger any additional landscaping/screening or site coverage requirements in the District Plant as it does not change the appearance of the existing site from the street. The unscreened parking areas are currently used for parking. As such, the effects on visual amenity are considered to be less than minor.

5.6 Positive effects

The proposed storage activities have the following positive effects:

- Storage will enable Taha to use a material produced from recycling, Ouvea Premix, to generate a new product, fertiliser. In doing so, Taha is turning something that was previously waste into something useable.
- Storage makes use of a site that has been largely unoccupied since 2002. This has encouraged ongoing maintenance and upgrades to the site to ensure it can be used by other industries for years to come.
- The Mataura community will benefit from the proposed flood protection measures, and particularly the use of sandbags north of the site, which will also provide protection for southern properties.

5.7 Summary

The proposed storage and transport activities have the potential to generate negative effects on people and the surrounding environment. In particular, an assessment has been undertaken regarding the effects of storing Ouvea Premix (and particularly the effects of the material mixing with water or entering the waterway), nuisance effects, traffic effects and amenity effects.

Given the low probability of a large flood occurring while Taha occupies the site, and the mitigation measures that are in place, it is considered highly unlikely that the Ouvea Premix would come into contact with water to the extent that harmful levels of ammonia gas or hydrogen gas will be produced, or that a harmful level of Ouvea Premix would entering the waterway. Even if water does come into contact with the product, any ammonia formed will generally remain in the product due to the high solubility of ammonia in water as aqueous ammonium hydroxide and hydrogen gas will rapidly disperse through the building's ventilation. Ammonia will

generally not be released as ammonia gas, and any fugitive gas emissions would be detected as an odour. Odour, dust and noise will be monitored and the best practical option will adopted to ensure there will be no objectionable odour, dust or noise emitted beyond the boundary of the site. The proposed activity will be conducted within existing buildings on site and will result in a minimal increase to traffic movements on a main highway.

It is anticipated that the environmental effects of proposed activity will be less than minor and the effects on any person will be negligible. Additionally, positive impacts such as reusing a waste product and upgrading a previously unoccupied building in Mataura will be generated. On request by the GDC, Taha has engaged a suitably qualified environmental professional to conduct an environmental risk assessment to confirm this assessment. Taha intends to provide a final report to GDC in April.

6. Notification Considerations

6.1 Notification

Section 95 to 95F of the RMA sets out the provisions for public notification and limited notification of applications. In particular, section 95A states that:

95A Public notification of consent application at consent authority's discretion

(1) A consent authority may, in its discretion, decide whether to publicly notify an application for a resource consent for an activity.

(2) *Despite subsection (1), a consent authority must publicly notify the application if—*

(a) it decides (under section 95D) that the activity will have or is likely to have adverse effects on the environment that are more than minor; or

(b) the applicant requests public notification of the application; or

(c) a rule or national environmental standard requires public notification of the application.

(3) Despite subsections (1) and (2)(a), a consent authority must not publicly notify the application if—

(a) a rule or national environmental standard precludes public notification of the application; and

(b) subsection (2)(b) does not apply.

(4) Despite subsection (3), a consent authority may publicly notify an application if it decides that special circumstances exist in relation to the application.

In determining whether an adverse effect is likely to be more than minor, section 95D states that:

95D Consent authority decides if adverse effects likely to be more than minor

A consent authority that is deciding, for the purpose of section 95A(2)(a), whether an activity will have or is likely to have adverse effects on the environment that are more than minor—

(a) must disregard any effects on persons who own or occupy—

(i) the land in, on, or over which the activity will occur; or

(ii) any land adjacent to that land; and

(b) may disregard an adverse effect of the activity if a rule or national environmental standard permits an activity with that effect; and

(c) in the case of a controlled or restricted discretionary activity, must disregard an adverse effect of the activity that does not relate to a matter for which a rule or national environmental standard reserves control or restricts discretion; and

(d) must disregard trade competition and the effects of trade competition; and

(e) must disregard any effect on a person who has given written approval to the relevant application.

Section 5 of this AEE has addressed the actual and potential adverse effects associated with the proposal. The assessment concludes that any adverse effect on the environment will be minimal and therefore meets the requirements of section 95D and full public notification under section 95A is not required and is not requested by the applicant.

In determining whether limited notification is required, section 95B of the Act states the following:

95B Limited notification of consent application

(1) If a consent authority does not publicly notify an application for a resource consent for an activity, it must decide (under sections 95E and 95F) if there are any affected persons, an affected protected customary rights group, or affected customary marine title group in relation to the activity.

(2) *The consent authority must give limited notification of the application to any affected person unless a rule or national environmental standard precludes limited notification of the application.*

(3) *The consent authority must give limited notification of the application to an affected protected customary rights group or affected customary title group even if a rule or national environmental standard precludes public or limited notification of the application.*

(4) *In subsections (1) and (3), the requirements relating to an affected customary marine title group apply only in the case of applications for accommodated activities.*

In deciding if a person is an affected person, section 95E states:

95E Consent authority decides if person is affected person

(1) A consent authority must decide that a person is an affected person, in relation to an activity, if the activity's adverse effects on the person are minor or more than minor (but are not less than minor).

(2) *The consent authority, in making its decision,-*

(a) may disregard an adverse effect of the activity on the person if a rule or national environmental standard permits an activity with that effect; and

(c) must have regard to every relevant statutory acknowledgement made in accordance with an Act specified in Schedule 11.

Written approval has been obtained from the landowner of these properties, being Gregory John Patterson and Douglas James Harvey. As such, the effects on the landowners do not need to be considered.

Given the proposed activity is located in State Highway 93, the New Zealand Transport Agency (NZTA) has also been consulted with and has provided written approval for the proposed activity. As such, the effects on NZTA also do not need to be considered.

There are no other activities or businesses located on the site that may be affected by this activity.

No other person is considered an affected person under section 95E and limited notification under section 95B is not required. Therefore the application can be processed on a non-notified basis.

7. Consultation

Taha has proactively engaged with the Mataura community regarding this resource consent. In particular, Taha held a community consultation session in Mataura on 21 January 2015. The public forum enabled the residents of Mataura to voice their concerns and Taha to clarify and respond to these concerns through the RMA process.

The main concerns that were raised by the community in this forum include:

- odour experienced by neighbouring properties;
- health implications of storing and processing Ouvea Premix on site, including air discharges;
- building suitability; and
- the risk of flooding and the potential environmental effects associated with this.

Taha has updated this resource consent application to address the public's concerns. In particular:

- Taha has decided not to process Ouvea Premix into fertiliser at the Mataura site, and the site will only be used for storage. Taha is seeking an additional site that is better suited for the processing activities. As such, there will be no air discharge emissions.
- Taha is working with the landowner to ensure the building is suitable for storage. The landowner has also undertaken a range of upgrades to the building, as listed in section 2.3 of this report.
- Taha has engaged a suitable qualified environmental professional to conduct a risk assessment of the activity. The risk assessment will involve assessing the risk of flooding on site ("likelihood") and the potential environmental effects should flooding occur ("consequence"). This additional information will be provided to the GDC as part of this resource consent application in April 2015.

A full list of issues and how these have been addressed by Taha is contained in Appendix G.

8. Resource Management Act 1991

The following assessment is provided in accordance with the relevant sections of the RMA that are applicable to this proposal.

8.1 Part II (Purposes and Principles) - Sections 5, 6, 7, and 8

Part II provides a common set of principles to be applied to the management of all resources.

8.1.1 Section 5 Assessment

The RMA has a single overarching purpose: to promote the sustainable management of natural and physical resources. Sustainable management is defined in section 5 as:

> *...managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while –*
>
> *(a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
>
> *(b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
>
> *(c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Comment

Taha uses a by-product from the aluminium smelting process (Ouvea Premix) and blends this into a mineral fertiliser. The proposed activity involves the storage of hazardous substances to assist with this process. This reduces a significant amount of waste going into landfill from the aluminium smelting process and therefore is a sustainable management of a resource.

The potential adverse effects on the environment of this activity will be avoided, remedied or mitigated, and are considered to be less than minor. This activity is considered to represent sustainable manage of natural and physical resources and is consistent with Part II of the RMA.

8.1.2 Section 6 Assessment

In achieving the purpose of the RMA, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the matters of national importance as set out in Section 6 of the Act.

Comment

The proposal is consistent with the matters set out under section 6 of the RMA. The proposed activity will sit in an existing industrial environment that has already been modified from its natural state. There will be no removal of indigenous vegetation associated with this project, no effects on cultural values in the area, an the proposed activity sits within the intent of the industrial zone.

8.1.3 Section 7 Assessment

Other matters that persons exercising functions and powers under the RMA shall have particular regard to when managing the use, development and protection of natural and physical resources, for this particular project, include:

(b) The efficient use and development of natural and physical resources:

(f) Maintenance and enhancement of the quality of the environment:

(g) Any finite characteristics of natural and physical resources:

Comment

This application has had particular regard to the matters listed above. The project supports a sustainable process to recycle waste produced from aluminium smelting in New Zealand. The effects of the storage will be managed so amenity values of the physical surrounds as well as the intrinsic values of ecosystems will not be adversely affected by the activity. The project recognises the finite characteristics of natural resources through waste recycling and demonstrates the efficient use of natural resources.

8.1.4 Section 8 Assessment

The principles of the Treaty of Waitangi shall be taken into account when managing the use, development, and protection of natural and physical resources.

Comment

The principles of the Treaty have been taken into account and no matters of interest have been identified.

8.2 Section 104(1)

This section of the Act requires that, when considering an application for resource consent, the consent authority must have regard to a number of factors, as considered below.

8.2.1 Section 104(1)(a)

This section requires that regard is given to the actual and potential effects on the environment of allowing the activity.

Comment

A detailed assessment of the actual and potential environmental effects of allowing storage is included in Section 5 of this report.

8.2.2 Section 104(1)(b)(i)

This section of the Act requires that regard is given to any relevant provisions of a national environmental standard (NES).

Comment

Both the NES for Air Quality and the NES for Managing Contaminants on Soils and Effects on Human Health have been assessed in preparing this application.

NES for Air Quality

The proposed activity will not release any toxic contaminants into the air. The best practicable option will be adopted to manage odour and dust nuisance.

NES for Contaminated Land

The site is listed on the hazards register as HAIL. No soil disturbance or change of land use is required and therefore the proposed works do not require consent under this NES. The provisions of the District Plan address the hazardous materials proposed to be stored and processed on site.

8.2.3 Section 104(1)(b)(ii)

This section of the Act requires that regard is given to any relevant provisions of any other regulations.

Comment

The Hazardous Substances and New Organisms Act 1996 (HSNO) and associated regulations are relevant to the proposal. The purpose of HSNO regulations is to protect the environment and the health and safety of people and communities by preventing or managing the adverse effects of hazardous substances and new organisms. The HSNO requirements have been complied with and are addressed in the AEE in Section 5 of this report.

8.2.4 Section 104(1)(b)(iii)

This section of the Act requires that regard is given to any relevant provisions of a national policy statement (NPS).

Comment

The National Policy Statement for Freshwater Management 2014 has been assessed, given the site's proximity to the Mataura River. The effects of the activity on the river are considered minimal. As outlined in the AEE, the substances will be fully contained, especially during loading/unloading. Taha will also monitor weather reports and has provisions for avoiding the release of substances in a flood situation.

8.2.5 Section 104(1)(b)(iv)

This section of the Act requires that regard is given to any relevant provisions of a New Zealand Coastal Policy Statement (NZCPS).

Comment

The project is not located within the Coastal Marine Area and assessment under the NZCPS is not required.

8.2.6 Section 104(1)(b)(v)

This section of the Act requires that regard is given to any relevant provisions of a regional policy statement or proposed regional policy statement.

Comment

The relevant objectives and policies under the Environment Southland Operative Regional Policy Statement 1997 and Proposed Regional Policy Statement 2012 relate to ensuring the quality of land, soil, water and air is maintained or enhances, and is not compromised by the likes of nutrient runoff, contamination or the storage, use and transportation of hazardous substances. The AEE in section 5 of this report outlines that the proposed activity will be managed in such a way to avoid or mitigate the adverse effects on the environment, including air, water and land. As such, the quality of these natural resources will not be compromised. Overall, the proposed activity is consistent with both the operative and proposed regional policy statements.

8.2.7 Section 104(1)(b)(vi)

This section of the Act requires that regard is given to any relevant provisions of a plan or proposed plan.

Comment

The relevant objectives and associated policies of the Gore District Plan are contained within chapters 4 (land use), 4A (natural hazards), 5 (transportation) and 6 (hazardous substances). The proposal has been assessed against these objectives and policies in the following table. Overall, the proposal is considered to align with the objectives and policies of the Gore District Plan.

Table 1: Relevant objectives / policies in the Gore District Plan

Objective / Policy	Is the proposal consistent?	Explanation
Objective 3.3 (2) – Land use Ensure that the effects of land use activities do not adversely affect the quality of the environment and are compatible with the characteristics and amenity values of each locality. Policy 3.4 (2) Control the adverse effects of land use activities on the environment.	Yes	The AEE in section 5 of this report found that the effects on the environment are considered to be no more than minor. The activity is within the Industrial zone so is comparable to the values of this locality.
Objective 4A.3 (2) – Natural Hazards Minimise the risk to people and property from inundation. Policy 4A.4 4) Within areas shown as "Subject to Actual or Potential Inundation" on the District Plan Maps the Gore District Council will: (a) … refer all resource, subdivision and building consents to Environment Southland for comment prior to determining whether to approve or issue those consents. (c) in respect of areas of Mataura shown as red, lime green or purple on the District Plan maps, require any buildings accommodating people to be built with their floor levels at least 300 mm above the 1978 flood level.	Yes	The activity will be within an area shown as "subject to Actual or Potential Inundation". The buildings in which the activity will be conducted are existing. Environment Southland has been consulted with in the development of this consent application with regards to flooding and the application has been amended following Environment Southland's input.
Objective 5.3(2) – Transport Protect where practical the quality of the adjoining environment and amenity values from the adverse effects of the use of land transport routes. Policy 5.4 (1) Control the adverse effects of land use activities on transportation networks. (2) Control, where practical, the adverse effects of land transportation networks and their use on the adjoining environment and amenity values. (3) Protect the integrity of the through-route function of state highways.	Yes	NZTA has been consulted and written approval has been obtained. Approval was obtained on an earlier version of the application; however, the potential traffic effects have been reduced further than the original proposal. An assessment of the effects of the proposal on traffic and the State Highway has been provided in section 6 of this report and the effects have been assessed as minimal. All loading and unloading will occur in off-site areas designed for truck access and manoeuvring. Trucks will be able to safety manoeuvre onsite to enable them to enter and exit the site in a forward direction.
Objective 6.3 (1) – Hazardous substances Prevent or mitigate adverse environmental effects and risks associated with the use, storage, transportation and disposal of hazardous substances. Policy 6.4 1) Limit the quantities of hazardous substances stored at sites to a level that is appropriate to the activities undertaken on that site and appropriate to the environment of that	Yes	Taha's site makes use of a hazardous waste product to produce mineral fertiliser. This avoids dumping the product into the land and ensuring it is reused. Risks associated with transportation has been minimised to the extent that Taha has control over – for example, Taha will ensure all hazardous substances are adequately packaged for travelling and will take particular care during loading and unloading materials. Taha has also selected certified companies for transporting the

locality. 2) Encourage alternatives to the use of hazardous substances. 3) Minimise the risks associated with the transportation of hazardous substances. 4) Avoid, where practical, the disposal of hazardous substances within the Gore District. 5) Ensure that any disposal of hazardous substances undertaken is in such a manner as to avoid any actual or potential adverse environmental effects.		goods. There will be no disposal of hazardous substances.

8.2.8 Section 104(1)(c)

This section of the Act requires that regard is given to any other matter the consent authority considers relevant and reasonably necessary to determine the application.

Comment

The Water Conservation (Mataura River) Order 1997 is also relevant to this proposal, given the proximity of the site to the Mataura River. The Mataura River Order relates to water permits, discharge permits and water takes on the Mataura River. While the proposed activity is located adjacent to the Mataura River, Taha is not seeking any resource consents to discharge contaminants to or take water from the Mataura River. As such, the Mataura River Order is not considered to apply to this application. The AEE provided in Section 5 of this report provides assesses the potential for discharges of contaminants to the Mataura River as minimal.

9. Conclusion

Taha proposed to store hazardous substances in an existing site in an industrial area in Mataura, in the Gore District. Taha requires land use consent under section 9 of the Resource Management Act 1991 (RMA) under the following Gore District Plan provisions:

- Rule 5.9.4 – A land use activity not complying with the off-street parking requirements for industrial activities.
- Rule 6.9(2) – Storage of Class 6 and 9 hazardous substances above the amount permitted by Rule 6.9(1)

The proposed storage and transport activities have the potential to generate negative effects on people and the surrounding environment. However, the actual and potential effects have been assessed as less than minor and Taha has a number of measures in place to prevent, minimise and manage the effects. Additionally, positive impacts such as reusing a waste product and upgrading a previously unoccupied building in Mataura will be generated. On request by the GDC, Taha has engaged a suitably qualified environmental professional to conduct an environmental risk assessment to confirm this assessment. Taha intends to provide a final report to GDC in April.

Taha has consulted with GDC, Environment Southland and various members of the Mataura community regarding this consent application. The application has been updated to address concerns that were raised during this consultation process.

Appendix A. Certificates of Title

COMPUTER FREEHOLD REGISTER
UNDER LAND TRANSFER ACT 1952

Search Copy

R.W. Muir
Registrar-General of Land

Identifier	**SL48/22**
Land Registration District	**Southland**
Date Issued	12 October 1892

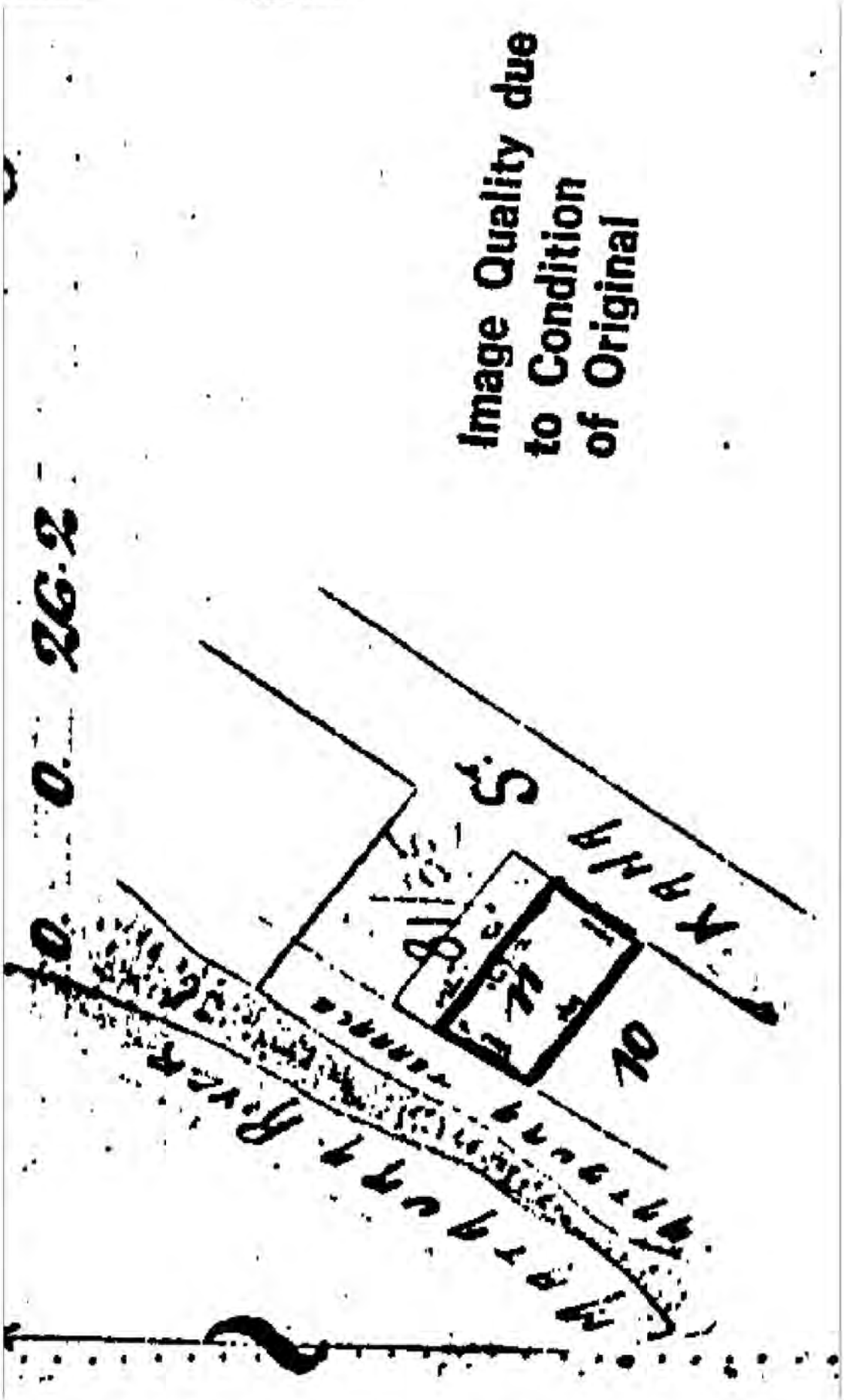
Prior References
SLVII/271

Estate	Fee Simple
Area	663 square metres more or less
Legal Description	Part Section 11 Block I Town of Mataura Bridge

Proprietors
Gregory John Paterson and Douglas James Harvie

Interests

9245396.7 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am
9245396.8 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am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to Condition
of Original

COMPUTER FREEHOLD REGISTER
UNDER LAND TRANSFER ACT 1952

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R.W. Muir
Registrar-General of Land

Identifier	**SL81/35**
Land Registration District	**Southland**
Date Issued	24 June 1907

Prior References
SL73/172

Estate	Fee Simple
Area	1.6837 hectares more or less
Legal Description	Section 4 Block XVI Town of Mataura Bridge, Closed Road Block I Town of Mataura Bridge, Part Section 11 Block I Town of Mataura Bridge and Allotment 1 and Part Allotment 2 Deposited Plan 147

Proprietors
Gregory John Paterson and Douglas James Harvie

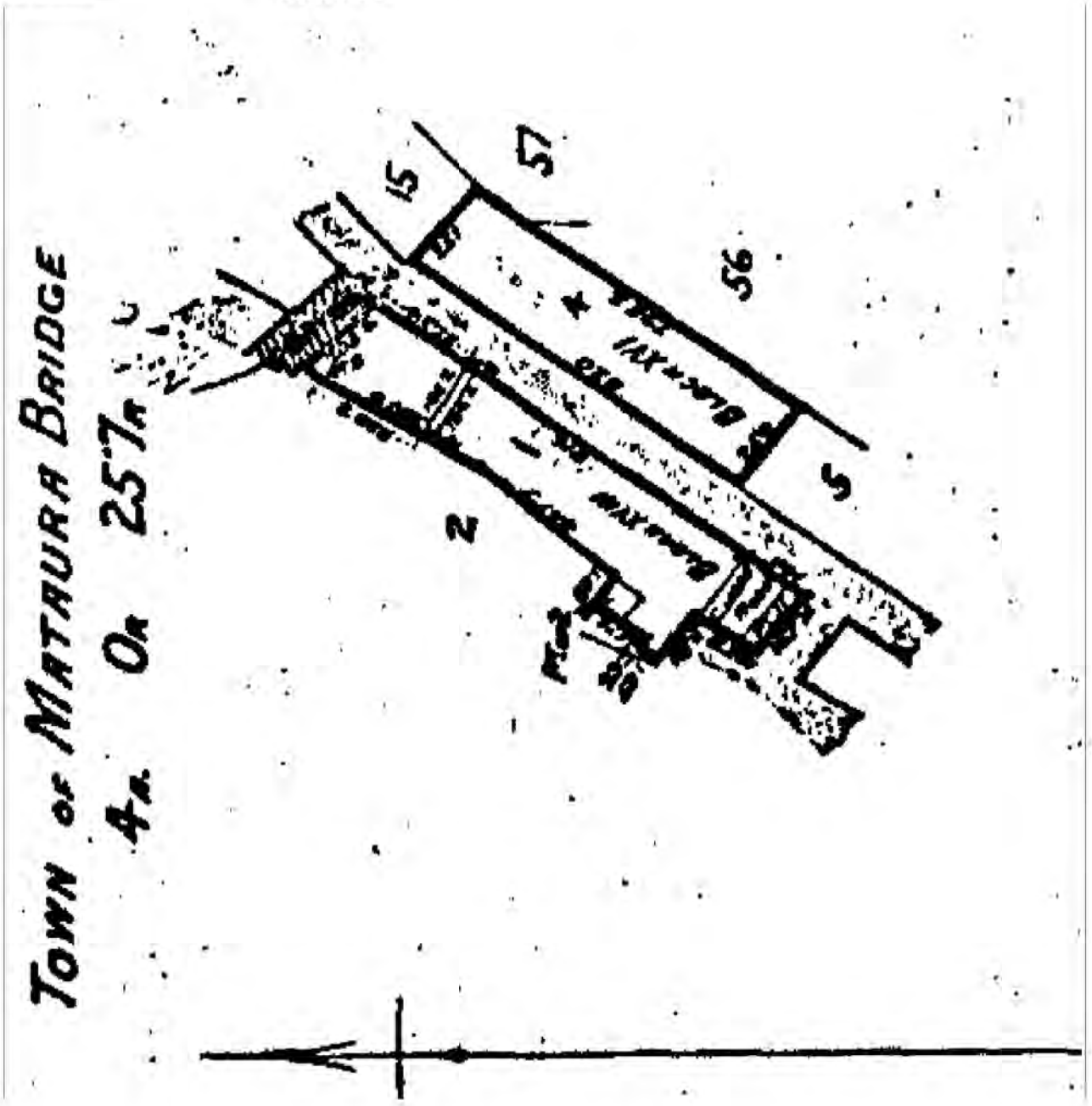
Interests

26089 Transfer creating the following easements - 24.6.1907 at 12.25 pm

Type	Servient Tenement	Easement Area	Dominant Tenement	Statutory Restriction
Water and Soil Races and Pipes	Allotment 1 and Part Allotment 2 Deposited Plan 147 - herein	Part herein	Part Allotment 2 Deposited Plan 147	
Take water	Part Allotment 2 Deposited Plan 147	Part	Allotment 1 and Part Allotment 2 Deposited Plan 147 - herein	
Electric wires	Allotment 1 and Part Allotment 2 Deposited Plan 147, Section 4 Block XVI Town of Mataura Bridge, Closed Road Block I Town of Mataura Bridge and Part Section 11 Block I Town of Mataura Bridge - herein	Part herein	Part Allotment 2 Deposited Plan 147	
Easement of way	Allotment 1 Deposited Plan 147 - herein	Part herein	Part Allotment 2 Deposited Plan 147	

9245396.7 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am

9245396.8 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am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COMPUTER FREEHOLD REGISTER
UNDER LAND TRANSFER ACT 1952

Search Copy

R.W. Muir
Registrar-General of Land

Identifier	**SL238/98**
Land Registration District	**Southland**
Date Issued	25 January 1962

Estate	Fee Simple
Area	582 square metres more or less
Legal Description	Section 12 Block I Town of Mataura Bridge

Proprietors

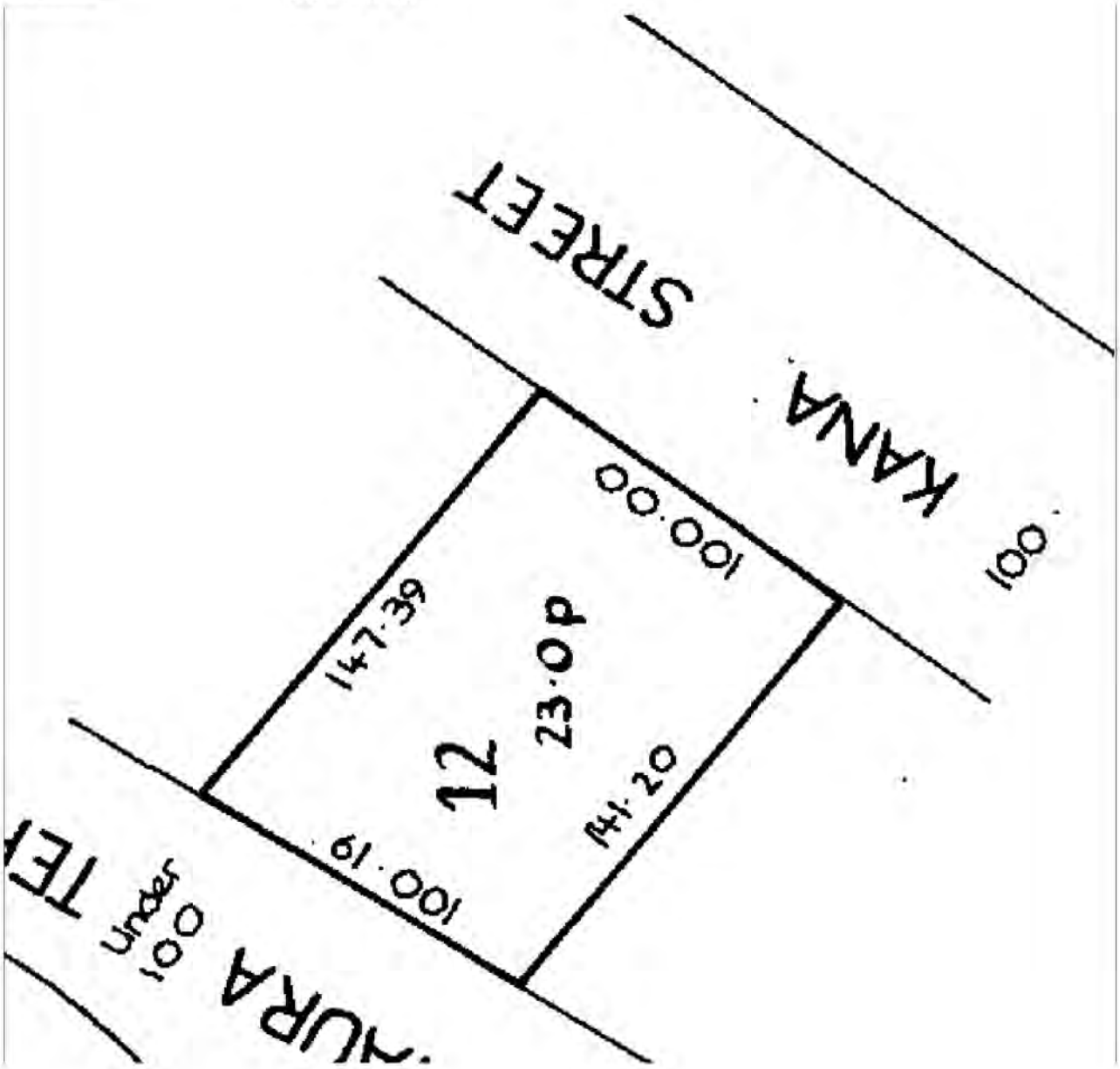
Gregory John Paterson and Douglas James Harvie

Interests

9245396.7 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am

9245396.8 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am

Identifier **SL238/98**



COMPUTER FREEHOLD REGISTER
UNDER LAND TRANSFER ACT 1952

Search Copy

R.W. Muir
Registrar-General of Land

Identifier	**SL41/253**
Land Registration District	**Southland**
Date Issued	29 September 1886

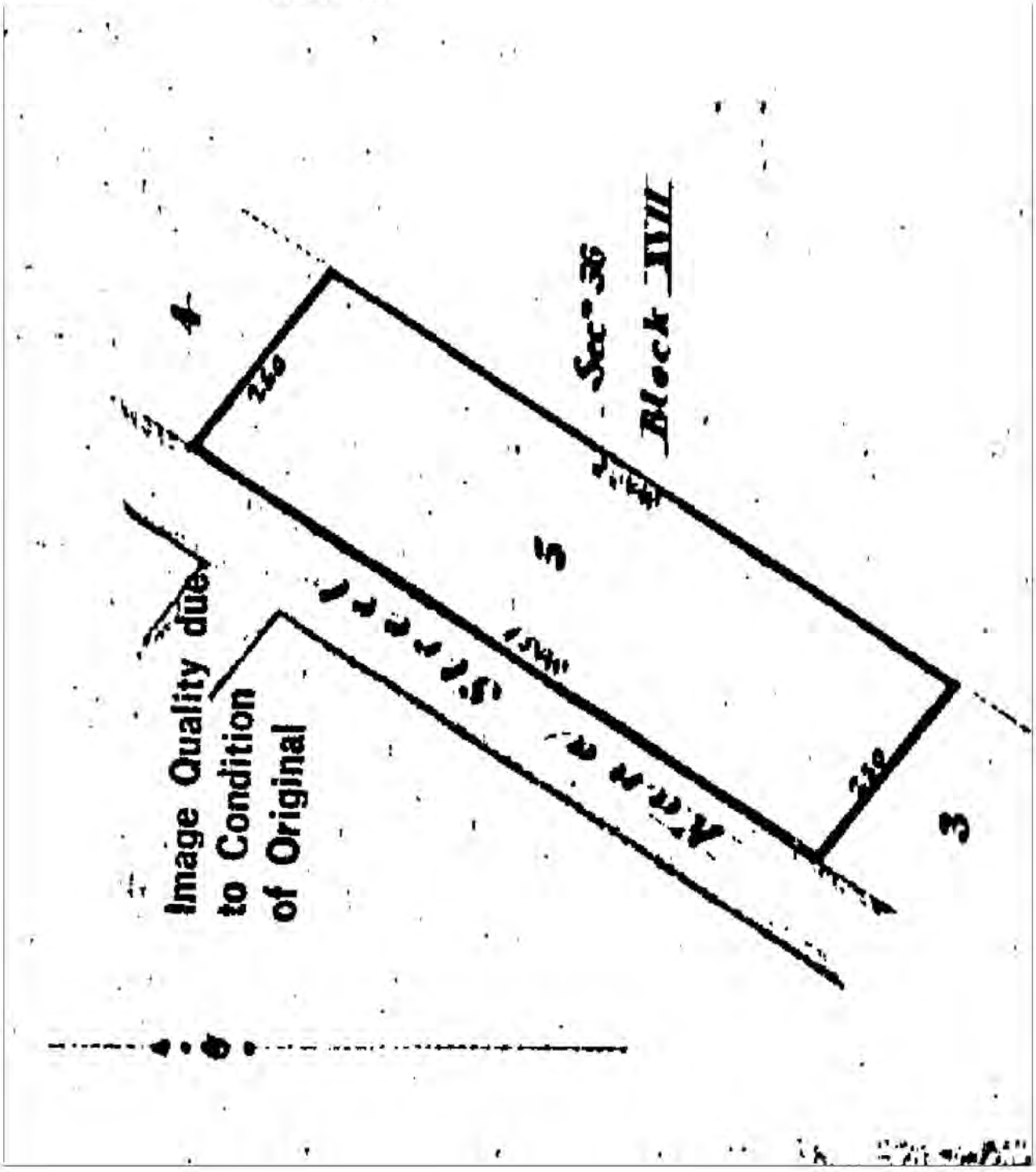
Prior References
WA O10/II

Estate	Fee Simple
Area	8094 square metres more or less
Legal Description	Section 5 Block XVI Town of Mataura Bridge

Proprietors
Gregory John Paterson and Douglas James Harvie

Interests
9245396.7 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am
9245396.8 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am

Identifier **SL41/253**



COMPUTER FREEHOLD REGISTER
UNDER LAND TRANSFER ACT 1952

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R.W. Muir
Registrar-General
of Land

Identifier	**SL144/175**
Land Registration District	**Southland**
Date Issued	21 January 1935

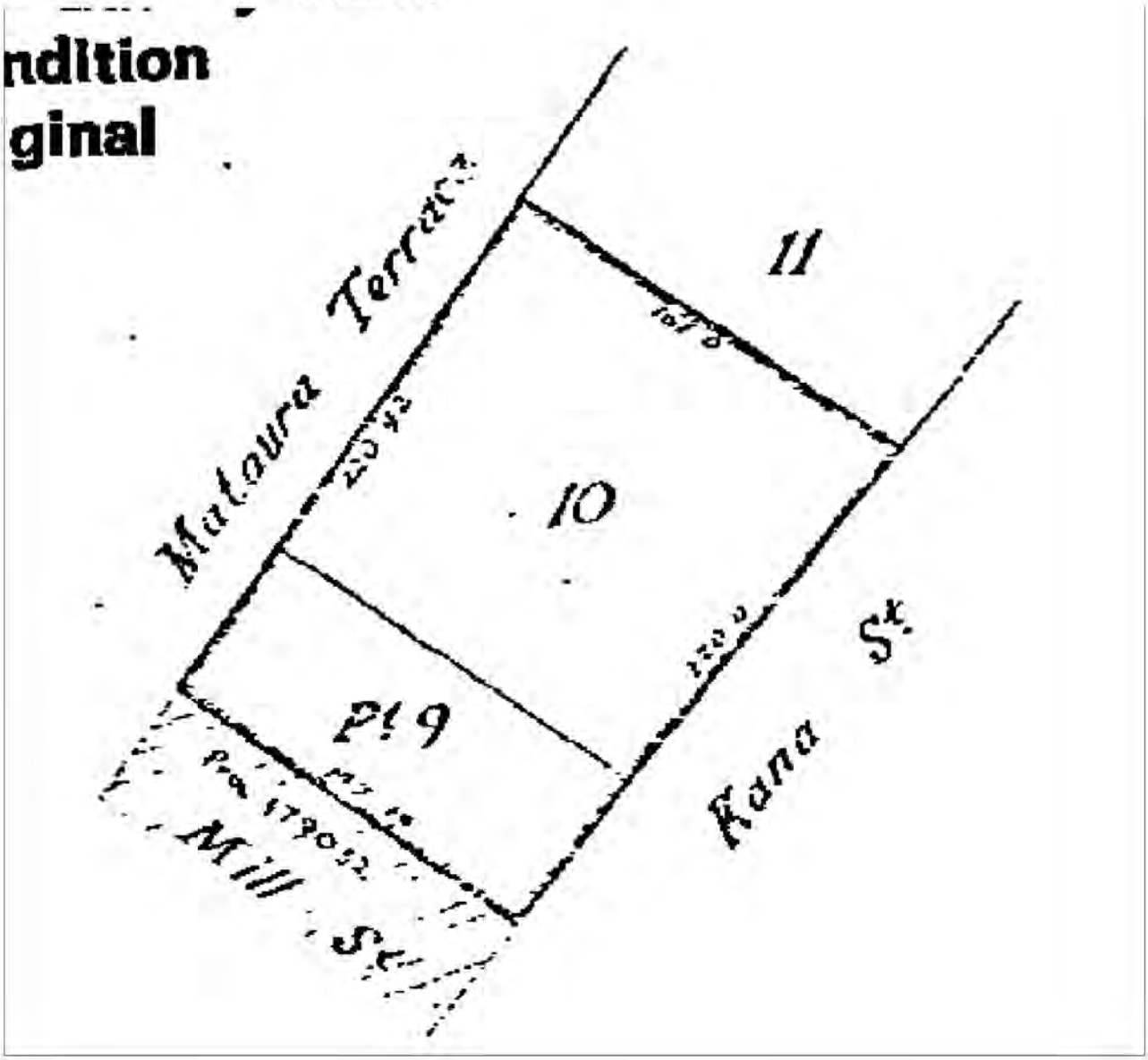
Prior References
SL7/230

Estate	Fee Simple
Area	1366 square metres more or less
Legal Description	Section 10 and Part Section 9 Block I Town of Mataura Bridge

Proprietors
Gregory John Paterson and Douglas James Harvie

Interests
9245396.7 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am
9245396.8 Mortgage to Albert Alloo & Sons Lawyers Nominee Company Limited - 8.5.2013 at 11:48 am

ndition
ginal



Appendix B. Site layout and drainage plans

FLOOD PROTECTION PLAN

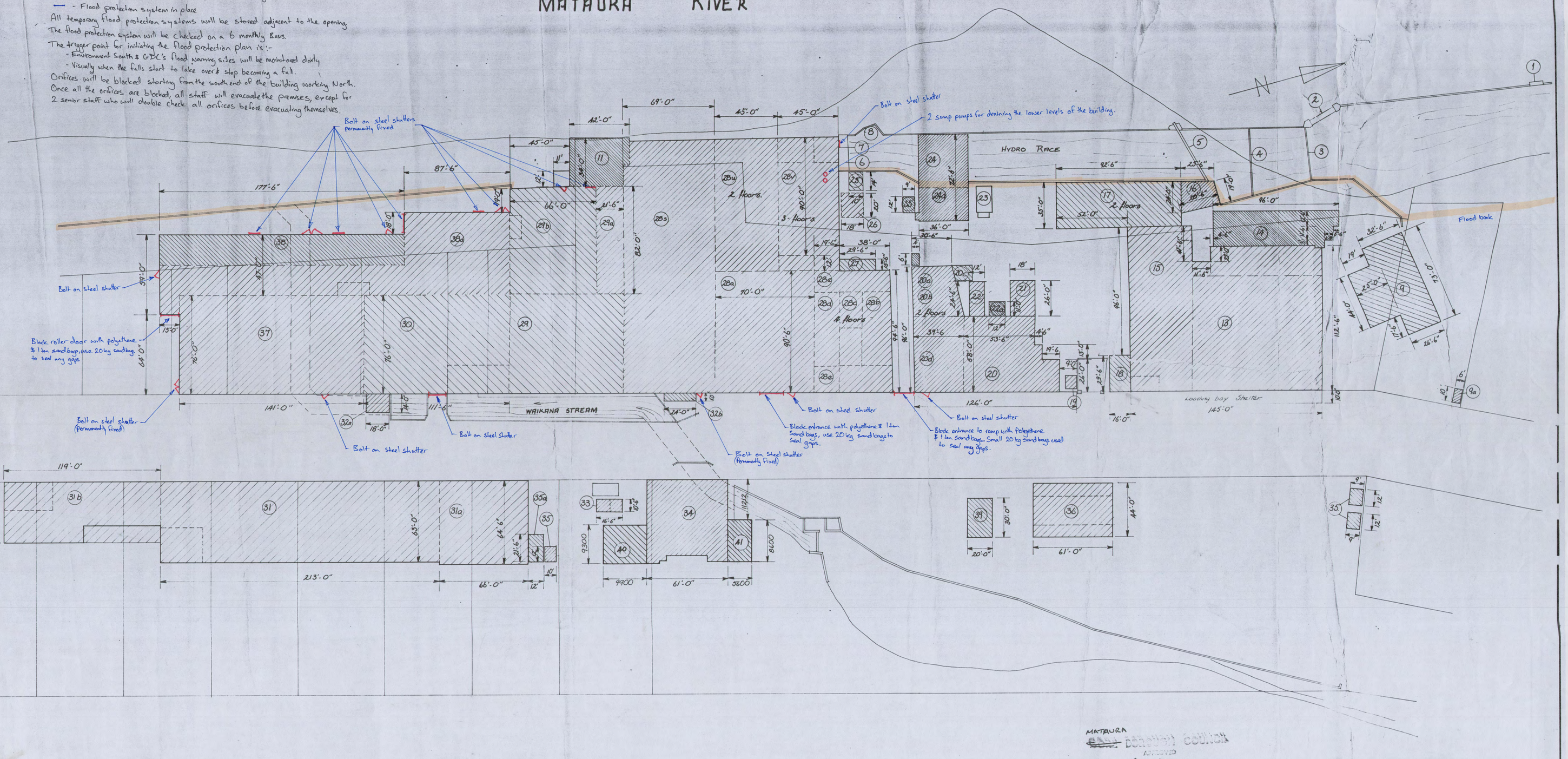
All flood protection systems go 600mm higher than the highest recorded flood.

- Flood water retaining wall.
- All potential orifices that are within 600mm of the highest recorded flood.
- Flood protection system in place

All temporary flood protection systems will be stored adjacent to the opening.
The flood protection system will be checked on a 6 monthly basis.
The trigger point for initiating the flood protection plan is:-
- Environment South & CBC's flood warning sites will be monitored daily
- Visually when the falls start to take overt step becoming a fall.

Orifices will be blocked starting from the south end of the building working North.
Once all the orifices are blocked, all staff will evacuate the premises, except for 2 senior staff who will double check all orifices before evacuating themselves.

MATAURA RIVER



1. Auxiliary Race Gate
2. Main Race Gate
3. Footbridge
4. Washout Bridge
5. Leaf Washout Bridge
6. Intake Grating
7. Sluice Gate.
8. Washout Gate.
9. Main Office Block
10.
11. Hydro Elect power Station.
12.
13. Raw Materials Storage.
14. Water Treatment Plant
15. Waste. Pulp Storage & Conveyors
16. Pump Station
17. Pulp mill
18. Boiler Brick Storage.
19. Chimney Stack
20. Turbine, Power & Boiler House
21. Oil Fired Boiler House.
22. Power House Amenities.
23. Fuel Oil Tank & Plant.
24. Stock Storage & Pumphouse.
25. Pump House (Fire Fighting)
26. Pump House.
27. Steel Racks.
28. Main Mill Buildings.
29. Winding Machines.
30. Cutting Machines.
31. Bag Factory & Stores
32. Bicycle Sheds.
33. Weighbridge & Office.
34. Tech Offices, Laboratory & Store
35. Stores.
36. Carpenters & Paint Shop.
37. Salle
38. Despatch/Warehouse
39. Oil Storage Building
40. Extensions to Tech Offices
41. " " Lab.

MATAURA BOROUGH COUNCIL
APPROVED
Inspector Date 27-6-77
Building Inspector Date 16-6-77
Engineer Date
THIS PERMIT IS ISSUED SUBJECT TO THE WORK BEING CARRIED OUT IN ACCORDANCE WITH THE BYE-LAWS OF THE COUNCIL.

AMENDMENTS	DATE
'F' Re-Drawn and Traced with Engineering Bulk Storage Area	19.9.75
'G' Up-Dated	8.10.75
'H' Re-Drawn.	12.12.75

DRAWN		
TRACED		
CHECKED		
DATE	12.12.75	

NEW ZEALAND PAPER MILLS LTD.,
KANA STREET
MATAURA,
NEW ZEALAND

DEPARTMENT MILL SITE.

KEY SITE PLAN
INSURANCE SCHEDULE

MATERIAL & PART LIST	
ASSEMBLY DRAWING No.	
SCALE	1/32" to 1'-0"
JOB No	
DRAWING No.	11-174
FILE No.	ISSUE 'F' / 'H'

SITE PLAN

SCALE 1:500 (A1)

SITE DETAILS

SITE 1 AREA - 8094 m2
LEGAL DESCRIPTION SECTION 5 BLOCK XVI TOWN OF MATAURA BRIDGE (CT SL41/253)

SITE 2 AREA - 16837 m2
LEGAL DESCRIPTION SECTION 4 BLOCK XVI ,TOWN OF MATAURA BRIDGE
CLOSED RD BLOCK I , TOWN OF MATAURA BRIDGE
PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE
LOT 1 & PART LOT 2, DP 147
(CT SL81/35)

SITE 3 AREA - 663 m2
LEGAL DESCRIPTION PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE (CT SL48/22)

SITE 4 AREA - 1366 m2
LEGAL DESCRIPTION SECTION 10 & PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE (CT SL41/253)

SITE 5 AREA - 582 m2
LEGAL DESCRIPTION SECTION 12 BLOCK I TOWN OF MATAURA BRIDGE (CT SL238/98)

SITE 6 AREA - 2008 m2
LEGAL DESCRIPTION SECTION 7 & 8 BLOCK I TOWN OF MATAURA BRIDGE (CT SL7/126)

APPLICANT TAHA ASIA PACIFIC INDUSTRIES LTD
ADDRESS 109 & 116-130 KANA STREET, MATAURA

KEY:

SITE BOUNDARY

BUILDING PERIMETER

NOTE : BOUNDARY DIMENSIONS APPROXIMATE ONLY

APPROVAL ISSUE

REV	DATE	DRAWN	REV'D	APP'D	REVISION
C	09-03-15	DCC	TD	NC	SITE LAYOUT PLAN SHOWING HAZARDOUS STORAGE ONLY
B	23-09-14	DCC	TD	NC	APPROVAL ISSUE
A	16-08-14	DCC	TD		CLIENT REVIEW ISSUE

DRAWING NUMBER | REFERENCE DRAWING TITLE

JACOBS
Level 3
86 Customhouse Quay
WELLINGTON 6011
NEW ZEALAND
Tel: +64 4 473 4265
Fax: +64 4 473 3369
Web: www.jacobs.com

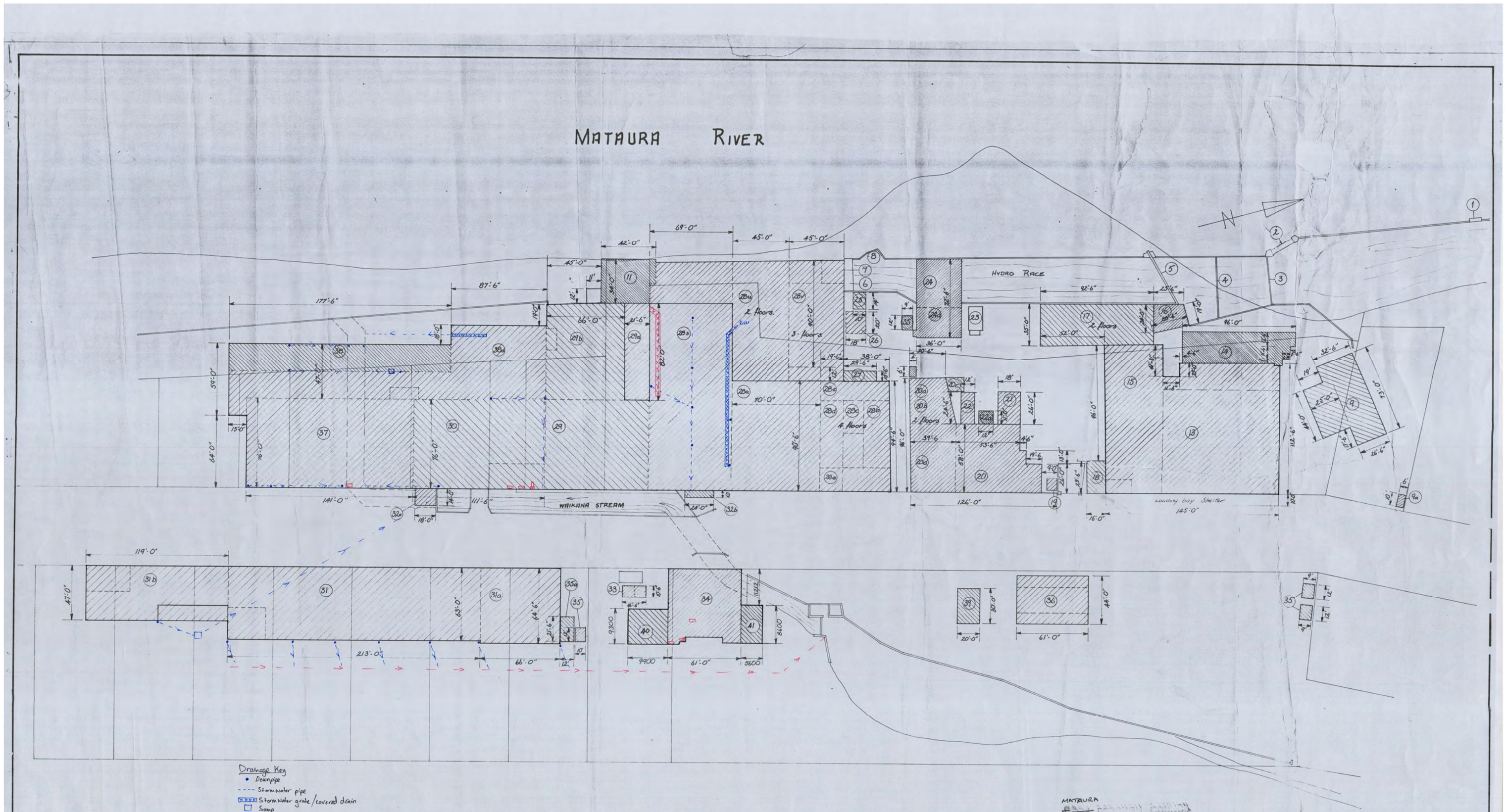
CLIENT TAHA ASIA PACIFIC LIMITED
PROJECT LAND USE CONSENTS FOR THE STORAGE OF HAZARDOUS SUBSTANCES

DRAWN	DRAWING CHECK	REVIEWED	APPROVED
DCC	TD	NC	NC
DESIGNED	DESIGN REVIEW	DATE 23-09-2014	DATE 23-09-2014
TD	NC		

TITLE
MATAURA
KANA STREET SITE PLAN

SCALE	DRAWING No	REV
1:500	AE04729-NEP-DG-0002	C

DATE: 9/03/2015 1:41:35 PM LOGIN NAME: CONNON, DAVID C
LOCATION: I:\AENV\Projects\AE04729\Deliverables (issued)\Drawings\AE04729-NEP-DG-0002.dwg



Drainage Key
- Downpipe
- Stormwater pipe
- Stormwater grate/covered drain
- Sump
- Open ditch drain
- Sink
- Trap
- Cable trench.

1. Auxiliary Race Gate
2. Main Race Gate
3. Footbridge
4. Washout Bridge
5. Leaf Washout Bridge
6. Intake Grating
7. Sluice Gate.
8. Washout Gate
9. Main Office Block
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11. Hydro Elect power Station.
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13. Raw Materials Storage
14. Water Treatment Plant
15. Waste Pulp Storage & Conveyors
16. Pump Station
17. Pulp mill
18. Boiler Brick Storage.
19. Chimney Stack
20. Turbine, Power & Boiler House
21. Oil Fired Boiler House
22. Power House Amenities.
23. Fuel Oil Tank & Plant
24. Stock Storage & Pumphouse.
25. Pump House (Fire Fighting)
26. Pump House.
27. Steel Racks.
28. Main Mill Buildings.
29. Winding Machines.
30. Cutting Machines.
31. Bag Factory & Stores
32. Bicycle Sheds.
33. Weighbridge & Office.
34. Tech Office, Laboratory & Store
35. Stores.
36. Carpenters & Paint Shop.
37. Salla.
38. Despatch/Warehouse.
39. Oil Storage Building
40. Extension to Tech Offices
41. " " Lab.

MATAURA BOROUGH COUNCIL
APPROVED
Date 27-6-77
Inspector
Date 14-6-77
Building Inspector
Date
Engineer
THIS PERMIT IS GIVEN SUBJECT TO THE WORK BEING CARRIED OUT IN ACCORDANCE WITH THE BY-LAWS OF THE BOROUGH.

AMENDMENTS	DATE
F' Re-Drawn and Traced with Engineering Bulk Storage Area	19-9-75
G' Up-Dated	8-10-75
'H' Re-Drawn.	12-12-75

DRAWN		NEW ZEALAND PAPER MILLS LTD., KANA STREET MATAURA, NEW ZEALAND
TRACED		
CHECKED		
DATE	12-12-75	

DEPARTMENT MILL SITE.

KEY SITE PLAN INSURANCE SCHEDULE

MATERIAL & PART LIST	
ASSEMBLY DRAWING No.	
SCALE	1/32" to 1'-0"
JOB No	
DRAWING No.	11-174
FILE No.	ISSUE F/G/H

Appendix C. Permitted Standards

The following table provides an assessment of Taha's compliance with the permitted standards in the Gore District Plan.

Rule	Explanation	Comment	Status of proposal
4.2(5)(g)	Industrial Activities within the Industrial Zone are permitted.	Activity is within the Industrial Zone	Permitted
4.5.1(3)	Noise limits in the Industrial Zone, measured at or beyond the zone boundary: • At any time – 55dBA Leq • 10pm-7am – 85dBA Lmax	Site will only in operation during week day working hours (i.e. 9am-5pm), so 55 dBA Leq limit applies. Activity will be within this limit.	Permitted
4.10.1(2)	Signs meeting the following standards are permitted: • Not projecting more than 1.5m over a road reserve or within 500mm of a kerb line, and • No less than 2.6m overhang above the footpath	Onsite signage will meet this standard.	Permitted
5.9.3	Loading/Unloading requirements for industrial activities: • Must provide an area for on-site loading/unloading where activity is in excess of 1000m^2; • Access to loading facilities shall be appropriate for type of vehicles servicing the site and comply with minimum design standards (Diagram 5.15); and • Entrance/egress must be in a forward direction.	All loading/unloading to be provided on site. Enough space for onsite manoeuvrability to enable trucks and cars to enter and exit the site in a forward direction.	Permitted

Appendix D. Environmental Management Plan

Taha Global Storage

ENVIRONMENTAL MANAGEMENT PLAN

- Final
- 17 October 2014

Taha Global Storage

ENVIRONMENTAL MANAGEMENT PLAN

- Final
- 17 October 2014

Taha – Asia Pacific Region
Head Office,
PO Box 1784
Invercargill 9810, New Zealand
Tel: +64 3 218 5944 x 5945
Web: www.tahacorp.com

Contents

Document history and status

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Mark Egginton	8 April 2013			8 April 2013	Draft

Distribution of copies

Revision	Copy no	Quantity	Issued to
Client Draft	1	1	Mark Egginton

Printed:	11 March 2015
Last saved:	17 October 2014 08:40 AM
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Author:	Mark Egginton
Project manager:	Israel Pankhurst
Name of organisation:	Taha International Corporation
Name of project:	Pilot Aluminium Recovery Process
Name of document:	Storage Environmental Management Plan
Document version:	Draft V1
Project number:	

1. Environmental Management System

This is the environmental management plan that sets out the environmental management system for the operation of the Taha Ouvea Pre-mix storage sites in New Zealand. This plan also:

- Highlights the main environmental aspects and impacts (and their planned mitigation);
- Provides further detail on the primary environmental risks for the sites (storm water and hazardous substances);
- Establishes an incident procedure; and
- Allocates roles and responsibilities for the environmental management system.

This environmental management plan is an evolving document, and will be regularly updated to account for any changes to operational procedures and logistics.

The purpose of the environmental management plan is to set the system that will be used to ensure that environmental impacts from the storage of Ouvea Pre-mix are minimised and kept within the bounds of any relative resource consents. Taha International Corporation (Taha) takes their environmental responsibility seriously, and the storage of Ouvea Pre-mix is an environmentally responsible process.

The environmental management systems are in accordance with requirements of the Hazardous Substances and New Organisms (HZNO) Act.

1.1. Environmental Objectives

The environmental objectives for the Taha storage sites are:

- Minimise negative environmental effects and risks from our storage sites on surrounding environments
- Meet the requirements of the relative District Plan, Regional Plan, and Resource Consent.

1.2. Scope

This environmental management plan covers all Taha's Ouvea Premix storage sites in Invercargill and Mataura, including:

- 109, 116-130 Kana Street, Matuara
- 76-89 Annan Street, Invercargill
- 139 and 143 Liddel Street, Invercargill

The locations of these sites are provided in Appendix A.

2. Aspects and Impacts

Table 1 below highlights the main environmental aspects and impacts faced by the operation of Taha Ouvea Pre-mix storage sites.

- **Table 1 Aspects and Impacts**

Activity	Aspect	Impact / Severity	Mitigation
Bulk materials – storage and handling	Ouvea Pre-mix spill	Ouvea premix is a dry goods hazardous substance. It would be an environmental problem if ouvea premix entered a waterway. Please refer to the current CBP & SPL for clean-up procedures (see Appendix C).	Ouvea Pre-mix will only be transferred within the building in heavy duty plastic lined bulk bags. Care will be taken when handling bulk bags. Site will be kept in a tidy and orderly state. Any spill will be cleaned up quickly, by using spill kits. Incident response procedures are in place, and staff trained to follow them. Use PPE Equipment as provided for dealing with Ouvea Pre-mix spills
	Dust creation from wind	The site is in an industrial area, but dust from top of bags could create a respiratory annoyance for nearby people and could also enter the nearby waterway.	Bulk materials will be stored inside out of direct wind. In windy conditions the warehouse doors will only be opened for vehicles entering or exiting. Materials will be covered during transport.
	Water reaches stored materials (e.g. flooding, fire-fighting, etc.).	A significant amount of material could be washed away to waterways, particularly the Mataura River located near the Mataura site. In the long term this could have a significant eutrophication effect on the nearby waterway. Refer to site maps provided.	A Flood Protection Plan is in place which will be executed once flood “trigger points” are reached. Environment Southland’s website will be monitored daily for flood warnings.

Activity	Aspect	Impact / Severity	Mitigation
Transport of hazardous materials	Air pollution	The most likely air pollution is odour, which could be a minor annoyance to people nearby.	Storage sites regularly monitored and maintained. Any odour complaints to be promptly investigated as per the incident procedure. Environment Southland has been consulted with regarding air discharges.
	Traffic	The loading and unloading of hazardous materials and increase in truck movements to and from the site may have an impact on traffic flows	Storage sites are designed to ensure trucks are able to load and unload with minimal traffic disturbance. Where necessary, on-site manoeuvring areas are provided for trucks to ensure they are not reversing onto main roads. NZTA is aware of and has approved activities on State Highway for the Mataura site.
	Materials tracked outside by vehicle wheels	Ouvea Premix is not particularly eco-toxic, but could be a source of excessive nutrients to the nearby waterway.	All bulk bags to be inspected . prior to transporting. All materials are contained in heavy duty plastic lined bulk bags during transport, loading and unloading. All truck service providers are NZAS qualified.
Management and administration	Leadership	Positive environmental leadership will have a large positive influence on the environmental integrity of the stores operations through decision making and role modelling towards less senior staff.	Environmental management plan and policy easily accessible to all staff. Environmental aspects discussed positively

Activity	Aspect	Impact / Severity	Mitigation
			and proactively by senior staff during meetings. Senior staff to lead by example.
	Resource use	Inefficient use of resources has a cumulative global negative environmental impact through increased greenhouse gas emissions, mining, and waste.	Senior staff to consider resource efficiency in decision making and procurement. Taha's blending is a "no waste" activity, whereby a waste substance (Ouvea Premix) is being used to generate another product. There is no trade waste created.

3. Most Significant Aspects

3.1. Spills and Stormwater

One of the most significant environmental risks for the storage of Ouvea Pre-mix is the risk of Ouvea Premix coming into contact with water or entering the local water way

Taha has developed a schematic of the storm water systems for each site. The schematic shows the stop points and directions of flow from the highest risk areas of the sites.

The following prevention and mitigation activities will be carried out by Taha Corporation International in regards to spills and stormwater:

- Incident response procedure is maintained and updated.
- Site will be kept in a tidy and orderly state.
- Care will be taken when handling materials and materials are kept in plastic lined bulk bags during transport, loading and unloading.
- Any internal spill will be contained within the building. This will avoid the possibility of spills entering storm water networks.
- Spill kits are kept on site. These include spades, brushes and all necessary PPE.
- Staffs are trained on the incident response procedure and how to use the spill kit. CBP's will be read and single point lessons will be available with all spill kits.
- The amount of hazardous material stored on site is minimised as far as logistically practical.

To avoid spills external to the building, particular care will be taken during loading and unloading of hazardous substances. All ouvea premix materials are stored in plastic lined bulk forklifting bags.

3.2. Flooding

A number of flood mitigation measures have been built on the site (primarily 109 Kana Street next to the Mataura River) to prevent water entering the site and buildings in the event of a flood. These measures include:

- A flood water retaining wall along the majority of the north-western boundary of 109 Kana Street with the Mataura River, built to withstand 600 mm above the highest recorded flood;
- Bolt on steel and concrete shutters attached to doors to prevent ingress of water, also built to withstand 600 mm above the highest recorded flood;

- All unused piping has been sealed and other essential stormwater piping have one-way valves installed to prevent the ingress of water; and
- Silica sandbags are stored on site to be used as emergency sand bagging in conjunction with polythene.

The location of steel and concrete shutters is identified in the site layout plan attached. Additional measures to prevent flood damage, should a flood occur, include:

- All hazardous substances are also stored in heavy duty plastic lined bags, which would be difficult to breach in the event of a flood to the extent that Ouvea Premix is fully saturated;
- The lower levels of the buildings on 109 Kana Street next to the Matuara River will not be used at all;
- Hazardous substances adjacent to the eastern side doorway of 116-130 Kana Street will be stored on pallets to prevent any contact with surface flooding off the adjacent bank; and
- The open drainage channel to the east of 116-130 Kana Street building will be checked and cleaned 6-monthly to prevent surface flooding.

In the event of a flood, the Flood Protection Plan will be executed. The Flood Protection Plan, including all flood protection measures, will be checked 6-monthly to ensure it is still fit-for-purpose. The 6-monthly check sheet is attached.

3.3. Hazardous substances

The Taha production activities require the storage and handling of large volumes of Ouvea Pre-mix and small quantities of Diesel for forklift use. These materials are summarised in Table 2.

Table 2 Hazardous Substances and Bulk Materials Stored On Site

Product name	product description	Max Volume	storage type	spill mitigation	HSNO classifications

Ouvea Pre-mix	Granular/ Powder	Annan St: 6,500T Liddel St: 2,800T Kana St: 10,000T	1-tonne, plastic-lined woven mesh forklift bags	6.3B hazardous material - Bags covered in plastic and stored indoors to prevent contact with moisture. Temperature will be controlled and is not to exceed 50C.	6.3A, 6.4A, 9.1C
Diesel	Liquid	100 litres	20 litre diesel drums	Stored indoors, temperature will be controlled and is not to exceed 50C.	3.1D, 6.1E, 6.3B, 6.7B, 9.1B.
Citric Acid	Powdered Crystals	350kg	25kg woven mesh bags	Stored in closed container indoors to prevent contact with moisture. Temperatu re will be controlled and is not to exceed 50ºC.	6.1E, 6.3B, 8.3A.
Silica Sand	Fine powder	150 T	1-tonne forklift bags	Not hazardous, shovel and wheelbarrow. Return to stock pile if uncontaminated.	Not hazardous

3.4. Air Pollution and Odour

The primary sources of contaminants discharged to air resulting from the proposed facility will be dust from the storage and handling of Ouvea Pre-mix and bulk materials. There may also be a small quantity of fugitive emissions, including ammonia, resulting from when the product gets damp (which could occur in the rare event of a roof leak or flood, if the plastic lined bulk bags get inundated with water), all at levels well below the Ministry of the Environments Ambient Air Guidelines.

Activities with the potential to generate dust will be controlled by material handling and storage protocols. These include keeping the doors and windows of the buildings closed during transporting and handling.

3.5. Traffic and transport

Ouvea Premix will be delivered from the Alumina Recycling Plant at Tiwai to the storage/production facilities in Invercargill and Mataura (locations provided in Appendix A). Once a processing facility is secured, material will then be transported from storage facilities to the processing facility.

The selected transport company will be fully responsible for transport of the 6.3a material from the Taha Asia Pacific site (located at Tiwai) to the designated Taha storage facilities, in Southland.

The selected transport companies are TNL Freight and Freight Haulage. They are both NZAS pre-qualified – which means they must prove (to TAHA and NZAS) that their company can:

- Suitably convey the material
- Meet all expectations for transport
- Keep the material contained

Drivers must:

- Be NZAS site inducted, and vehicles to become NZAS compliant
- Have a Dangerous Good Licence with 6.3a hazardous material specified
- Become an approved handler status of 6.3a material (by our Hazardous Materials Certifier)

To manage effects of the loading and unloading of hazardous substances at the storage facilities on traffic flow, the following will be undertaken:

- Site loading and unloading areas are designed to ensure minimal impacts on traffic flows.
- Where necessary, onsite manoeuvring areas are provided to ensure trucks do not need to reverse onto main roads.
- Loading and unloading areas and truck routes are clearly marked on site.
- Where loading or unloading requires trucks to park on the road (due to site constraints), appropriate measures such as road cones will be used to divert traffic.
- Loading/unloading to be avoided in wet conditions.

All materials will also be suitably packaged to avoid discharges or contamination during transport, loading and unloading.

NZTA has been consulted with regarding truck movements to and from the Mataura site onto the state highway.

4. Incident Procedure

For all identified environmental incidents (large or small), the following procedure is followed:

1) On site staff: Incident is isolated or halted if safe to do so (split bag on concrete floor)
2) On site staff: Notify-
   a) Emergency Services if required
   b) General Manager for any incident more than minor
   c) Environment Southland if there are any adverse environmental impacts (e.g. spill reaches stormwater system) within 4 hours of the event.
3) On-site staff: Respond and clean up, co-ordinating support from other staff or institutions if necessary. Staff can follow the H&S manual for procedure details.
4) On-site staff: Complete an environmental incident form (provided in Appendix B) Environmental officer: Investigate the incident
5) Environmental officer: Implement improvements to operations and the environmental management plan based on lessons learnt from the incident. Referring to the H&S manual step 3.

More specific guidance is provided for spills, transport incidents, and noise and odour complaints in the sections below.

4.1. Spills

The procedure above should be followed in the case of a spill. Specifically:

- Incident isolation is critical, and should be done to block the spill from reaching the stormwater system, any pits in the area, unsealed ground, and stormwater runoff areas. This can be achieved using the spill kit and the stormwater system shut-off valves.
- Additional guidelines (Single point lesson) are prepared for specific spill situations. Information is in the H&S manual.

4.2. Floods

In the event of a flood, the Flood Protection Plan will be implemented. The Flood Protection Plan consists of the following steps:

1) Environmental Manager to initiate Flood Protection Plan when one or both of the following “trigger points” occurs:

a. Environment Southland and Gore District Council's flood warning site issues flood warnings for Mataura River (site to be monitored daily by Environmental Manager); and/or
b. visually, when the falls start to "lake-over" and stop being a waterfall.

2) All orifices will be blocked using the steel shutters and sand bags starting from the south end of the building working north. Previously, this exercise has taken six hours for three staff to implement, However, Taha will have half the shutters permanently fitted, so estimates this would take three hours to implement with three staff members (note that while the site is unoccupied, permanent staff members will come from the Invercargill office to implement this stage).
3) Once all orifices are blocked, all staff will evacuate the premises, except for 1-2 senior level staff, who will double check all orifices, and that all other staff have left the site safely, before evacuating themselves.

As part of the 6-monthly check procedure, Taha will conduct a "flood drill" and a run-through of flood measures to ensure the Flood Protection Plan can be done effectively and within good time.

4.3. Transport

Emergency responses during transport are most likely to be managed by the local emergency response agencies. The local fire stations have been advised of the activities. The General Manager shall be advised as soon as Taha is made aware that any of its material is involved in a transportation environmental emergency.

Response assistance shall be offered to the local emergency response agencies.

4.4. Noise and Odour Complaints

In response to a complaint, a representative of TAHA will firstly discuss the complaint with the applicant, before any action is taken. All complaints will receive an immediate response from TAHA and will be logged and recorded.

(This is a general outline but, as each case is different, there may be slight variations).

1) When reporting a noise or odour complaint we will require an applicant's details, which are kept confidential. Please note that anonymous complaints will not be accepted, because we need to know who is affected by the problem. All complaints will be treated seriously and followed through until a mutual solution is achieved.
2) The complainant will be given log sheets immediately after reporting their complaint, and they need to be completed for a 2 weeks period detailing the incidences of the noise or odour. The information you provide will give us a better idea of the extent of the problem.

3) The complainant must return the log sheets with 28 days. If the log sheets are not returned, we will assume that the matter is resolved and an investigation is not required.
4) Once the complainant log sheets have been returned they will be reviewed. If the information indicates that the noise or odour exceed tolerable levels we will consider odour or noise monitoring in the vicinity of the site.

   Once noise levels have been confirmed to exceed 65dBA as provided under the Invercargill District Plan, via these means, Taha will take action within the site to reduce levels to permissible levels.

5. Roles and Responsibilities

Taha International Corporation will have a staff member allocated the role of Environmental Officer. This role will include responsibility for the maintenance of the environmental management plan, the follow-up of any environmental incidents, the training of staff, the maintenance of plant, and regular audits. While the Environmental Officer is responsible for ensuring that these activities occur, they may delegate any or all or the tasks to more suitable people. The tasks and their frequency are provided in Table 3.

- **Table 3 Environmental Officer Tasks**

Task	Frequency
Revise Environmental Plan	Annual
Carry out training (spill kit, environmental management plan, etc.)	New staff, annual update
Check equipment maintenance	Quarterly
Incident response	As required
Incident investigation	As required
Check ES flood warning website	Daily
Instigate Flood Protection Plan	As required
Check site tidiness	Weekly
Check environmental management plan, incident form, Current best procedures, MSDSs are readily available	Quarterly
Audit environmental procedures	Annually

Taha Environmental Officer is:

Dave Duncan

Production Supervisor

Work: 03 218 1004

Mob: 021 02383193

Mataura River Catchment flood warning information website:
http://www.es.govt.nz/media/11783/mataura_flood_warning_web.pdf

Appendix A Location of Present Storage Sites

Figure 1 Taha Asia Pacific Invercargill Storage Sites

Figure 2 Taha Asia Pacific Mataura Storage Sites

Appendix B Environmental Incident Form

Environmental Incident Form

This form should be completed as soon as practicable after any environmental incident and given to the Environmental Officer.

Date and time	
Location	
Weather	
Description of incident	
Staff in vicinity of the incident	
Response to the incident	
Further response required	
Lessons to be learnt from incident	

Signed ..... Date .....

Name ..... Role .....

Appendix C Flood Protection Plan check sheet

Flood Protection System Check sheet

Needs to be checked 6 monthly

1. All threads are functional and greased
2. The sealing rubbers are in good condition
3. All sealing shutters are present
4. Polyethylene and sandbags are present and in good condition
5. Permanent shutters checked for condition and sealing
6. Practice run of the plan done to ensure familiarity

Date Checked	Person preforming check	Signature

Appendix D Location of flood measures

FLOOD PROTECTION PLAN

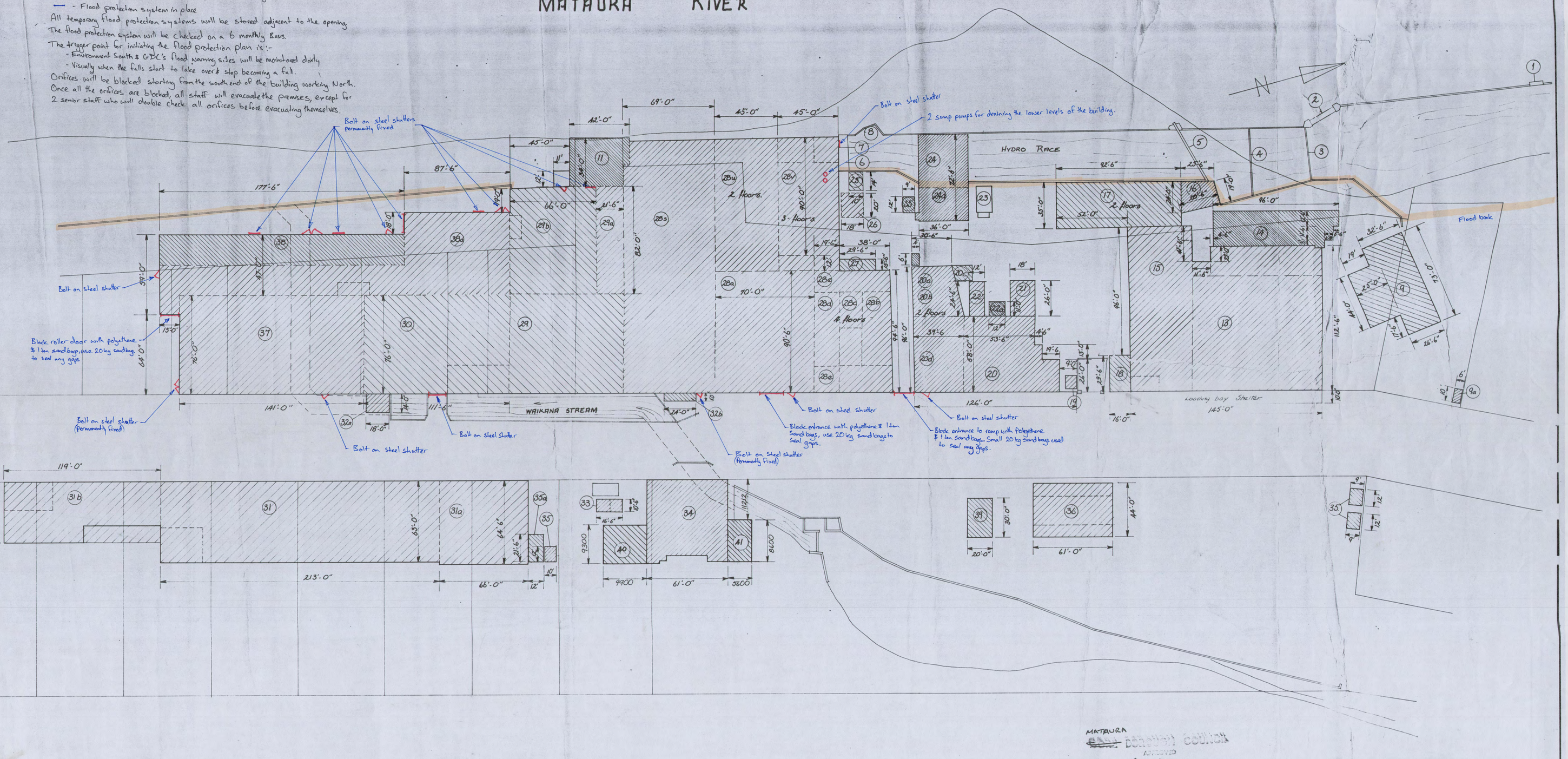
All flood protection systems go 600mm higher than the highest recorded flood.

- Flood water retaining wall.
- All potential orifices that are within 600mm of the highest recorded flood.
- Flood protection system in place

All temporary flood protection systems will be stored adjacent to the opening.
The flood protection system will be checked on a 6 monthly basis.
The trigger point for initiating the flood protection plan is:-
- Environment South & CBC's flood warning sites will be monitored daily
- Visually when the falls start to take overt step becoming a fall.

Orifices will be blocked starting from the south end of the building working North.
Once all the orifices are blocked, all staff will evacuate the premises, except for 2 senior staff who will double check all orifices before evacuating themselves.

MATAURA RIVER



1. Auxiliary Race Gate
2. Main Race Gate
3. Footbridge
4. Washout Bridge
5. Leaf Washout Bridge
6. Intake Grating
7. Sluice Gate.
8. Washout Gate.
9. Main Office Block
10.
11. Hydro Elect power Station.
12.
13. Raw Materials Storage.
14. Water Treatment Plant
15. Waste. Pulp Storage & Conveyors
16. Pump Station
17. Pulp mill
18. Boiler Brick Storage.
19. Chimney Stack
20. Turbine, Power & Boiler House
21. Oil Fired Boiler House.
22. Power House Amenities.
23. Fuel Oil Tank & Plant.
24. Stock Storage & Pumphouse.
25. Pump House (Fire Fighting)
26. Pump House.
27. Steel Racks.
28. Main Mill Buildings.
29. Winding Machines.
30. Cutting Machines.
31. Bag Factory & Stores
32. Bicycle Sheds.
33. Weighbridge & Office.
34. Tech Offices, Laboratory & Store
35. Stores.
36. Carpenters & Paint Shop.
37. Salle
38. Despatch/Warehouse
39. Oil Storage Building
40. Extensions to Tech Offices
41. " " Lab.

MATAURA BOROUGH COUNCIL
APPROVED
Inspector Date 27-6-77
Building Inspector Date 16-6-77
Engineer Date
THIS PERMIT IS ISSUED SUBJECT TO THE WORK BEING CARRIED OUT IN ACCORDANCE WITH THE BYE-LAWS OF THE COUNCIL.

AMENDMENTS	DATE
'F' Re-Drawn and Traced with Engineering Bulk Storage Area	19.9.75
'G' Up-Dated	8.10.75
'H' Re-Drawn.	12.12.75

DRAWN		
TRACED		
CHECKED		
DATE	12.12.75	

NEW ZEALAND PAPER MILLS LTD.,
KANA STREET
MATAURA,
NEW ZEALAND

DEPARTMENT MILL SITE.

KEY SITE PLAN
INSURANCE SCHEDULE

MATERIAL & PART LIST	
ASSEMBLY DRAWING No.	
SCALE	1/32" to 1'-0"
JOB No	
DRAWING No.	11-174
FILE No.	ISSUE 'F' / 'H'

Appendix E Current Clean-Up CBP & SPL

HSEQ Management System	Document Type:	Procedure
	Version No:	1.0
	Current Risk:	Low
	Next Review Date:	August 2015
Title: Ouvea Premix Spills in Stores	Approved By:	Mark Egginton
	Date:	01.08.2012
Topic: Ouvea Spill Response Kit		

Context
To ensure that initial resources are readily available for the immediate response to an Ouvea Premix spill in any of the Taha stores and warehouses to minimise potential hazards to personal and the environment.

Purpose
This kit is for the containment and clean-up of Ouvea Premix spills. It should never be used in the presence of water as Ouvea Premix is affected and gives off ammonia gas.

Resources
Personnel: One

Equipment: Ouvea Premix Response Kits

Safety Equipment
PPE Requirements – Disposable coveralls, gloves safety goggles and mask.

Links – JSAs etc
Single Point Lesson: Cleaning-up Ouvea Premix Spills

Frequency
As Needed

HSEQ Management System	Document Type:	Procedure
	Version No:	1.0
	Current Risk:	Low
	Next Review Date:	August 2015
Title: Ouvea Premix Spills in Stores	Approved By:	Mark Egginton
	Date:	01.08.2012
Topic: Ouvea Spill Response Kit		

Procedure

Main Step	Actions	Issues
Location	• Spill kits are strategically located next to all store room doors door. • Blue coloured Mobile kit in a 2-wheel trolley with a shovel, broom and bulk bags at same location with Single Point Lesson.	
Safety	• All items in this kit are safe to use, but once items are used they must be placed in the used bag provided and returned to Supervisor for disposal.	**Safety** Use gloves, goggles and masks with materials.
Replacement	• This kit is intended for emergency use and any items that are used must be replaced.	
Kit Contents	• Spill response guide & Single Point Lesson:	
	• Socks: These are used to contain the spill and prevent it spreading.	3 x 7.6cm x 1.2m 2 x 7.6cm x 3.6m
	• Pads:	80
	• Bulk Bag: Provided for the collection of material pending disposal.	2 of (950 x 950mm)
	• Pillows:	2 x 45cm x 45cm
	• PPE: One set of Coveralls, Gloves, Goggles and a mask.	1
	• Shovel & Brush:	1 of each
Disposal	• Used PPE should be placed in disposable bag provided in the kit and along with split bulk bag shall be presented to Supervisor at either the TAP or TFI Plants for correct disposal and replacement.	
Report	• Supervisor to record spill in incident log and arrange immediate replacement of used items.	

HSEQ Management System	Document Type:	Procedure
	Version No:	1.0
	Current Risk:	Low
	Next Review Date:	August 2015
Title: Ouvea Premix Spills in Stores	Approved By:	Mark Egginton
	Date:	01.08.2012
Topic: Ouvea Spill Response Kit		

Appendix 1: Procedure Details and History

Document Owner:	TAP & TFI Plant Managers *(Accountable Role)*	**Current Version Author:**	Mark A. Egginton

Version Number:	Changes made	By Whom
1.0	Reviewed, Insertion of Single Point Lesson.	Mark Egginton

Taha Asia Pacific Ltd

SINGLE POINT LESSON

Utilising the Spill Kit for cleaning up Ouvea Premix

Context: Loading, unloading and bag settlement can sometimes result in bulk bags splitting. These spills need to be cleaned up in a safe manner that will not impact on the environment or become a safety hazard due to slippery floors. Fully equipped spill kits are supplied and should be used.

Purpose: This kit is for the containment and clean-up of Ouvea Premix Spills and to ensure they are carried out in a safe and effective manner.

DO NOT USE WATER TO CLEAN THE SPILL

1. Put on the supplied PPE: coveralls, gloves, safety goggles, mask.

2. Use bunding and other equipment in spill kit if required.

2. Open up the one ton bag with liner and place on the floor close to the spillage area. You will need to open it up completely and push down to a workable level for you. Then you will be able to get shovel full's in the bag without any spillage.

3. Get the shovel and broom supplied and commence clean-up of the spillage ensuring to keep product away from any wet areas or spill ways.

4. Once the entire spill has been shovelled into the bag, tie the neck of the liner securely. Repeat as necessary.

5. Place your PPE in the disposal bags provided. Bring this back to work with you to be cleaned/replaced as needed.

6. Return or arrange for the damaged bag to the TFI Plant for proper disposal.

7. Notify your Supervisor that you have cleaned up a spill.

8. For further information refer to CBP: Ouvea Premix Spills in Stores.

Appendix D - Ouvea Pre-mix MSDS

MATERIAL SAFETY DATA SHEET

Ouvea Premix Date: 10 May 2012

PRODUCT AND COMPANY INFORMATION

PRODUCT NAME:	Ouvea Premix
DESCRIPTION:	Solid grey powder
PRODUCT USE:	Ingredient in the preparation of mineral fertiliser
SUPPLIER::	Taha Fertilizer Industries Limited
CONTACT INFORMATION:	Telephone: 03 218 1002; Address: 162b Bond Row, Invercargill, New Zealand
EMERGENCY PHONE:	

HAZARD IDENTIFICATION

DANGEROUS GOODS		Not applicable
HSNO CLASSIFICATION	**6.3A**	**Skin irritant.**
	6.4A	**Eye irritant.**
	9.1C	**Aquatic ecotoxicant**
SIGNAL WORDS:		**WARNING**
HAZARD STATEMENT:	H315	Causes skin irritation.
	H320	Causes eye irritation.
	H412	Harmful to aquatic life with long lasting effects.
PREVENTION STATEMENTS:	P264	Wash hands and eyes thoroughly after handling.
	P280	Wear protective gloves.
	P273	Avoid release to the environment.
RESPONSE STATEMENTS:	P302 + P352	IF ON SKIN: Wash with plenty of soap and water.
	P321	Specific treatment: use of specific cleansing agent not required.
	P332 + P313	If skin irritation occurs: get medical advice/attention.
	P362	Take off contaminated clothing and wash before re-use.
	P305 + P351	IF IN EYES: Rinse cautiously with water for several minutes.
	P338	Remove contact lenses, if present and easy to do so. Continue rinsing.
	P337 + P313	If eye irritation persists; get medical advice/attention.

COMPOSITION/INFORMATION ON INGREDIENTS

Component Name	CAS No.	Concentration (%)
Aluminium oxide	1344-28-1	75-95
Metal fluoride salts	Not available	0-15
Copper	7440-50-8	<0.1
Metal nitrides	Not available	<3
Magnesium	7439-95-4	<1
Silicon	7440-21-3	<1
Manganese	7439-89-6	<1
Iron	7439-89-6	<1.5
Nickel	7440-02-0	<0.1
Beryllium	7440-41-7	<0.02

FIRST AID MEASURES

SKIN CONTACT:	Quickly remove contaminated clothing and wash before re-use. Wash skin with plenty of soap and water. Seek medical attention if irritation persists.
EYE CONTACT:	Remove contact lenses if present. Cautiously rinse eye with gently running water for 15 minutes. Do not rub the eye. Seek medical attention if eye irritation persists.
INHALATION:	If inhaled, remove to fresh air.

INGESTION:	Rinse mouth. Do NOT induce vomiting. Seek medical attention.

FIRE FIGHTING MEASURES

HAZARDS:	Non-flammable.
EXTINGUISHING MEDIA:	Water fog, foam, Carbon dioxide or dry chemical.
PROTECTIVE CLOTHING:	Wear protective gloves.
OTHER INFORMATION:	Do not allow washings to reach aquatic environment.

ACCIDENTAL RELEASE MEASURES

SPILL CLEAN UP METHOD:	Contain and recover. Use appropriate tools to put the spilled solid in a convenient waste disposal container. Avoid contamination of waterways. If material does enter waterways contact the local authority.
PROTECTIVE CLOTHING:	Wear protective gloves.

HANDLING AND STORAGE

HANDLING:	Wear gloves. Avoid contact with the skin and eyes
	Ecotoxic in the environment, avoid loss into waterways.
STORAGE:	Keep containers tightly closed.

EXPOSURE CONTROL/PERSONAL PROTECTION

ENGINEERING CONTROLS:	Handle in well ventilated area
PERSONAL PROTECTION:	Wear gloves.
EXPOSURE LIMITS:	No exposure limits have been specifically assigned to this product and there are no Short Term Exposure Limits (STELs).
	TWA – Aluminium oxide 10 mg/m^3
	TWA – Copper (dust) 1 mg/m^3
	TWA – Silicon 10 mg/m^3
	TWA – Manganese (dust) 1 mg/m^3
	TWA – Beryllium 0.002 mg/m^3

PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE:	Solid (grey powder)
pH:	Not applicable
SOLUBILITY:	Negligible
BOILING POINT:	2980°C
MELTING POINT:	2072°C

STABILITY AND REACTIVITY

STABILITY:	Stable, will not polymerise
REACTIVITY:	Reactive with acids

TOXICOLOGICAL INFORMATION

SKIN CONTACT:	May cause skin irritation
EYE CONTACT:	May cause eye irritation

ECOLOGICAL INFORMATION

Ecotoxic in the environment. Avoid loss into waterways.

DISPOSAL CONSIDERATIONS

CONTAINER DISPOSAL:	Dispose of empty containers safely. Avoid contamination of any water suppl with product or empty container.
PRODUCT DISPOSAL:	Dispose of product safely. Avoid contamination of any water supply with product or empty container.

TRANSPORT INFORMATION

UN NUMBER:	Not applicable
PROPER SHIPPING NAME:	Not applicable
DANGEROUS GOODS	Not applicable

CLASS	
PACKING GROUP:	Not applicable

NZ REGULATORY INFORMATION

HSNO APPROVAL NUMBER:	HSR002503
GROUP STANDARD:	Additives, Process Chemicals and Raw Materials (Subsidiary hazard)
HSNO CLASSIFICATIONS:	6.3A Skin irritant
	6.4A Eye irritant
	9.1C Aquatic ecotoxicant
HSNO CONTROLS:	Approved handler requirements: Not applicable

OTHER INFORMATION

ISSUE DATE:	22 March 2012
DEFINITIONS:	TWA – Time Weighted Average (The 8 hour time-weighted average exposure standard designed to protect the worker from the effects of long term exposure)

Safety Data Sheet

Section 1: Identification of the Substance and the Supplier.

Product Name: **Citric acid**

Recommended use: Various

Company details: Aakland Chemicals (1997) Ltd

Address: 12 Wigram Close, Sockburn
PO Box 323, Christchurch 8140

Telephone number: +64 3 341 8490 **Facsimile**: +64 3 341 8491

Email: aakland.chemicals@xtra.co.nz

Emergency Phone No: 0800 243 622 (*0800 CHEMCALL*) for out of hours advice

Section 2: Hazards identification

HSNO classifications:

6.1 E May be harmful if inhaled
6.3 B Causes mild skin irritation
8.3 A Causes serious eye damage

Section 3: Information on Ingredients

Components	CAS Number	Proportion
Citric acid, anhydrous	77-92-9	>99 % w/w

Section 4: First Aid Measures

First Aid: Call a Doctor or National Poisons Centre 0800 POISON (0800 764 766) following first aid treatment.

Skin Contact: Rinse skin with plenty of water. Remove contaminated clothing and wash before re-use.
If skin irritation persists, get medical advice/attention.

Eye Contact: Rinse with water for several minutes, remove contact lenses if present and easy to do, continue rinsing. **Seek medical attention**

Ingestion: Rinse mouth, do **NOT** induce vomiting.
Call a POISONS CENTRE or doctor if you feel unwell.

Inhalation: If breathing is difficult, remove to fresh air and keep at rest in a position comfortable for breathing.
Call a POISONS CENTRE or doctor if you feel unwell.

Medical attention and special treatment: Treat symptomatically

Section 5: Fire Fighting Measures

Hazards from combustion products: On burning toxic fumes may develop including oxides of carbon. Autoignition temperature: 1011°C. As with most organic solids, fire is possible at elevated temperatures or by contact with an ignition source. Fine dust dispersed in air in sufficient concentrations, and in the presence of an ignition source is a potential dust explosion hazard.
Precautions for fire fighters and special protective equipment: Wear self-contained breathing apparatus and protective clothing when in close proximity or in confined spaces
Suitable extinguishing media: Water spray, dry chemical, alcohol foam, or carbon dioxide

Section 6: Accidental Release Methods

Method and materials for containment and clean up: Sweep up spilt material and transfer to plastic drums for approved disposal. Avoid contamination of waterways.

Section 7: Handling and Storage

Precautions for safe handling: Wear correct PPE gear when handling
Conditions for safe storage: Store in a cool, dry, ventilated area

Section 8: Exposure controls/Personal protection

Workplace Exposure guidelines:	Particulates not otherwise classified: WES-TWA 10mg/m3 Inspirable dust WES-TWA 3mg/m3 Respirable dust
Ventilation specification:	A system of local and/or general exhaust is recommended to keep employee exposures as low as possible
Personal Protective equipment:	Wear protective clothing, gloves, eye-protection, dust mask

Section 9: Physical and Chemical Properties

Physical state:	Crystals
Colour:	Colourless
Odour:	Odourless
Solubility in water:	ca. 60 g/100 ml @ 20C (Anhydrous)
Specific gravity:	1.542 g/cm^3
Melting point (°C):	ca. 100°C
pH:	5% aqueous solution; 1.8

Section 10: Stability and Reactivity

Chemical Stability: Stable under ordinary conditions of use and storage

Conditions to avoid: Heat, flames, ignition sources and incompatibles

Material to avoid: Metal nitrates (potentially explosive reaction), alkali carbonates and bicarbonates, potassium tartrate. Will corrode copper, zinc, aluminium and their alloys.

Hazardous reactions: Carbon dioxide and carbon monoxide may form when heated to decomposition.

Section 11: Toxicological Information

Ingestion: Causes irritation to the gastrointestinal tract. Symptoms may include nausea, vomiting and diarrhoea. Extremely large oral dosages may produce gastrointestinal disturbances. Calcium deficiency in blood may result in severe cases of ingestion

Eye contact: Corrosive and highly irritating; may also be abrasive.

Skin contact: Causes irritation to skin. Symptoms include redness, itching, and pain.

Inhalation: Causes irritation to the respiratory tract. Symptoms may include coughing, shortness of breath.

Long term effects: Chronic or heavy acute ingestion may cause tooth enamel erosion.

Section 12: Ecological information

Ecotoxicity: Not Determined
Bioccumulative: No
Rapidly Degradable: Yes

Section 13: Disposal considerations

Disposal methods: Dispose of the product and packaging at an approved landfill or other approved facility. Avoid contamination of waterways. Do not use container for any other purpose.

Section 14: Transport information

Road and Rail Transport: Not classified as a Dangerous Good according to NZS 5433:1999 Transport of Dangerous Goods on Land

Marine, Air Transport: Similar listing as for Road and Rail Transport apply

Section 15: Regulatory Information

ERMA NZ Approval: HSR003138

Section 16: Other information

Disclaimer: This SDS summarises our best knowledge at the date of issue, the chemical health and safety limits of the material and general guidance on how to safely handle the material in the workplace. Since Aakland Chemicals (1997) Ltd cannot anticipate or control the conditions under which the product may be used, each user must, prior to usage, assess and control the risks arising from its use of the material. If clarification or further information is needed, the user should contact Aakland Chemicals (1997) Ltd

Appendix E. Ouvea premix HSNO classification

Environmental
Protection Authority
Te Mana Rauhī Taiao

7 March 2012

File Ref R:DMHS-02-10-01
SOS #1001568

Tim Strange
Taha Fertilisers Industries Limited
SKM, PO Box 10283
Wellington 6143

Dear Tim

Determination of the Status of Ouvea Premix

Thank you for your application to determine if Ouvea Premix is considered to be hazardous and if it is covered by an existing approval under the Hazardous Substances and New Organisms (HSNO) Act 1996.

Based on the information available and the details you have provided, our advice is that Ouvea Premix is considered to be hazardous and will fall into the group standard approval ***Additives, Process Chemicals and Raw Materials (Subsidiary Hazard) Group Standard 2006 [HSNOT Approval Number HSR002503],*** which has an approval under the HSNO Act. A copy of this group standard can be found on the EPA website at http://www.epa.govt.nz/hazardous-substances/about/approvals/group-standards/Pages/default.aspx

If you consider that Ouvea Premix may fit more appropriately into a different group standard, or if you use Ouvea Premix for a different purpose, you may move the product to another group standard providing it fits within the scope of that group standard. You do not need to contact us further in this situation but must ensure that the appropriate conditions are applied. If you need further help regarding which group standard may be applicable, please contact us for advice. In further correspondence with us regarding Ouvea Premix, please be sure to quote our reference number (SOS1001568).

Please also note that although we consider the product, Ouvea Premix to be covered by an existing approval, the constituent components will need their own individual approvals if they are to be separately imported. Therefore, if you are intending to manufacture Ouvea Premix in New Zealand, you will need to ensure that each component has its own approval under the HSNO Act. Your supplier should be able to advise you on this.

For your information, the preliminary hazard classification assigned to Ouvea Premix is 6.3A (skin irritant), 6.4A (eye irritant), 9.1C (aquatic ecotoxicant).

The folloing substances may require notification to the New Zealand Inventory of Chemicals (NZIoC):
Aluminium Carbide, CAS#1299-86-1
Aluminium Nitride CAS#24304-00-5

PH +64 4 916 2426
FAX+64 4 914 0433
EMAIL info@epa.govt.nz

BP House
20 Customhouse Quay
Private Bag 63002, Waterloo Quay
Wellington 6140, New Zealand

www.epa.govt.nz

This advice is provided in good faith and to the best of our ability given the information available.

Note: The 'User Guide to Thresholds and Classifications under the HSNO Act' has been revised (March 2008). An electronic version is available at http://www.epa.govt.nz/Publications/ER-UG-03-2.pdf.

Yours sincerely

Benjamin Sowman
Administration Assistant
Hazardous Substances

Appendix F. Written Approval

GUIDELINES TO PERSONS FROM WHOM WRITTEN APPROVAL IS SOUGHT

1. You do not have to sign this form nor give any reasons for such action to the Applicant. You should however advise the Council of your decision as this impacts on the processing of the resource consent.
2. You should only sign this form if you are totally satisfied that you fully understand what is being proposed and you have no objection to it.
3. You are entitled to take your time to consider the information being given to you and to seek advice from friends, professional advisers or Council staff.
4. You can ask for changes to the proposal. If the Applicant does not agree you can withhold your approval. Any agreed changes must be in writing, signed by yourself and the by the Applicant and attached to this form.
5. If you require further information, then ask the Applicant for this.
6. Where appropriate, clear plans showing details of the development, including the distance of buildings from boundaries and their dimensions, are required to be seen and signed by you.
7. If you give your approval to the application Council will not have regard to any effects the proposal may have on you. Once resource consent is granted it is almost impossible to retract it.
8. If you do not give your approval you will have a formal right of objection at a later date should the Applicant proceed through the consent process.
9. If you change your mind after signing this form, your consent may be withdrawn before final determination of the application by advising the Council in writing that your written approval is withdrawn.

If in doubt seek advice before signing this form

CATEGORY OF PERSON(S) GIVING THEIR WRITTEN APPROVAL

Please tick the box(es) below as appropriate:

Owner of property potentially affected by application ..... ✓

Occupier of property potentially affected by application ..... ✓

Statutory Agency .....

Interest Group.....

WRITTEN APPROVAL

If the owner or occupier of a property affected by the development for which written approval has been sought, please give the address of that property:

121 Kana St, Matamata.

Do you understand fully the proposal and the reasons why resource consent is being sought? (please tick)

Yes ✓ No

Do you give your written approval to the proposal? (please tick)

Yes ✓ No

Have you signed plans showing details of the development? (please tick)

Yes ✓ No

Do you want changes to the proposal or conditions imposed on it? (please tick)

Yes No ✓

If "yes" include details on a separate sheet and have the Applicant sign their agreement to these.

Signed: .....

Name: Douglas James Harvie

Date: 24/9/2014

Gore District Council
Civic Square
PO Box 8
GORE
Phone (03) 209-0330
Fax (03) 209-0347
Website www.goredc.govt.nz

Gore District Council

RESOURCE MANAGEMENT ACT 1991
RESOURCE CONSENT AFFECTED PERSONS CONSENT FORM

This form is to be used when Council staff have advised that wr approval is required from persons they consider to be affected by have an interest in, a resource consent application being lodged with Gore District Council.

INSTRUCTIONS TO APPLICANTS

1. The written approval of both the land owner and land occupie required. If that is not provided the application will be notified.
2. Sufficient information must be provided so that the person f whom you are seeking written approval can fully understand proposed development and the impact it will have on them.
3. Clear plans showing details of the development, including distance of any buildings from boundaries and their dimensic are required to be seen and signed by the person giving t written approval. You may wish to check with Council staff that plans being used are acceptable.
4. You must give time for the person receiving the information assess it. That includes providing them with a copy of all relev information to read at their leisure and responding to any que they may have. You should give them with a copy to retain their records.
5. The person you are seeking approval from may request chan to your proposal. If you agree these are to be recorded in writ signed by both of you and submitted with this form. If you do agree the person from whom you are seeking approval is at lib to withhold consent.

If Council staff are not satisfied that the information and pl provided is complete and sufficiently clear to enable the per giving their written approval to fully understand its effects, you be required to repeat the process.

If you have any queries about the resource consent process or the legal implications of this form please contact Rosie Given or Keith Hovell at the Gore District Council by telephoning Council on (03) 209-0330 or by email at rgiven@goredc.govt.nz or khovell@goredc.govt.nz.

DETAILS OF THE APPLICANT

Name of Person, Business or Organisation seeking consent:

Taha Fertiliser Industries Limited

Contact Person (if different to above):

Israel Pankhurst

Contact Address:

162b Bond Road North
West Invercargill
Invercargill 9810

Telephone: 03 2151002

Mobile Phone 027 509 3450

Email: israel@tahacorp.com

DETAILS OF THE APPLICATION

Application Location:

109 & 127 Kana Rd
Matauira
(Paper Mill)

Description of the Proposal

The storage of hazardous goods for fertiliser Manufacture

Reasons for Resource Consent (Highlight those parts of the proposal requiring approval and the extent of non-compliance with the District Plan)

Hazardous goods storage limit exceeded with class 6 & class 9.

Class 6 allowable quantity 1000 kg
Class 9 allowable quantity 5000 kg.
We currently have 7000 ton of a class 6&9 product called Cuwa Premix onsite, & this will increase to a maximum of 10,000 ton, before the fertiliser plant is fully operational.

DETAILS OF THE INFORMATION SUPPLIED

The Applicant must list below the information supplied to the person from whom written approval is being sought

Site Plan
Environmental Management Plan
Application of Environmental Effects

DETAILS OF PERSON(S) GIVING THEIR WRITTEN APPROVAL

Name of Person, Business or Organisation giving approval:

Douglas James Harvie

Contact Name (if different to above):

Contact Address:

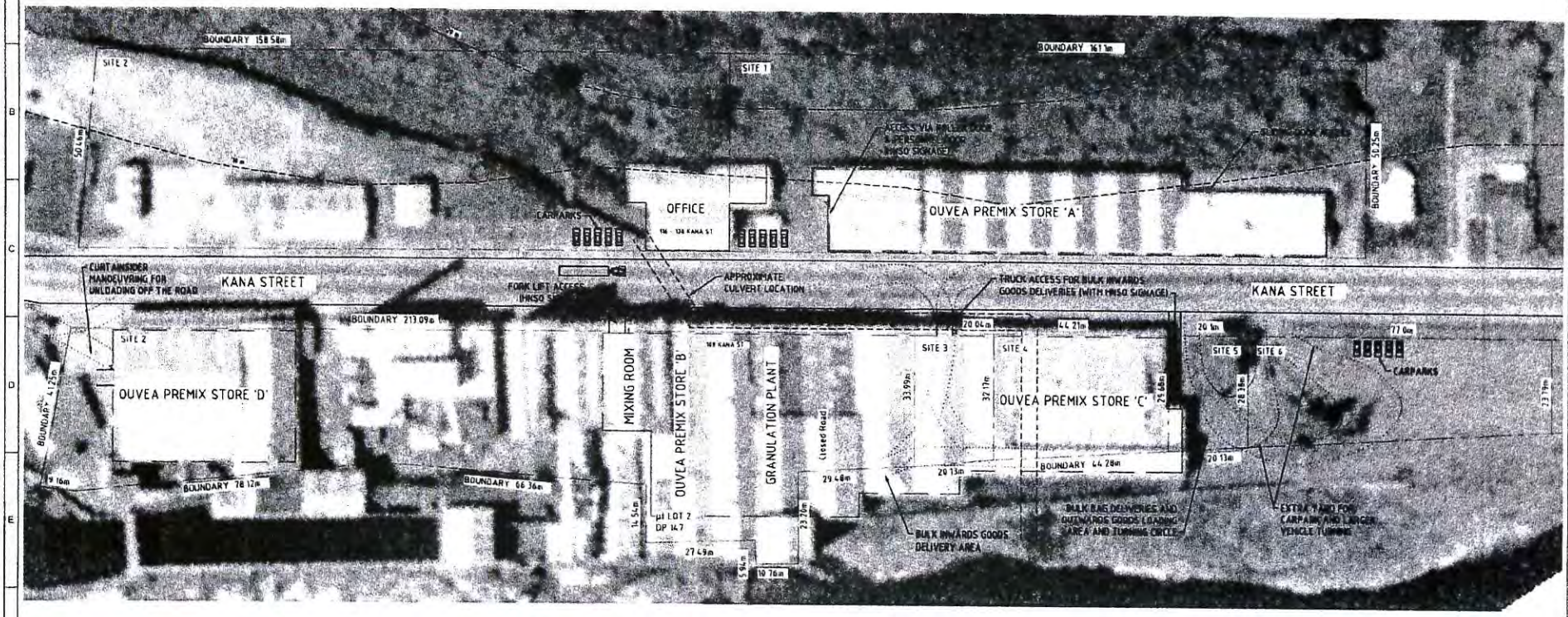
PO Box 5740
Dunedin 9016

Email Address: dharvie@hgw.co.nz

Telephone: 03 4775005

Mobile Phone 021 2234169

If you have any queries about the resource consent process or the legal implications of this form please contact Rosie Given or Keith Hovell at the Gore District Council by telephoning Council on (03) 209-0330 or by email at rgiven@goredc.govt.nz or khovell@goredc.govt.nz



SITE PLAN
SCALE 1:500 (A1)

SITE DETAILS

SITE 1 AREA - 8094 m2
LEGAL DESCRIPTION SECTION 5 BLOCK XVI TOWN OF MATAURA BRIDGE (CT SL41/253)

SITE 2 AREA - 16837 m2
LEGAL DESCRIPTION SECTION 4 BLOCK XVI TOWN OF MATAURA BRIDGE
CLOSED RD BLOCK I TOWN OF MATAURA BRIDGE
PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE
LOT 1 & PART LOT 2, DP 147
(CT SL81/35)

SITE 3 AREA - 663 m2
LEGAL DESCRIPTION PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE (CT SL48/22)

SITE 4 AREA - 1366 m2
LEGAL DESCRIPTION SECTION 10 & PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE (CT SL41/253)

SITE 5 AREA - 582 m2
LEGAL DESCRIPTION SECTION 12 BLOCK I TOWN OF MATAURA BRIDGE (CT SL238/98)

SITE 6 AREA - 2008 m2
LEGAL DESCRIPTION SECTION 7 & 8 BLOCK I TOWN OF MATAURA BRIDGE (CT SL7/126)

APPLICANT TAHA ASIA PACIFIC INDUSTRIES LTD
ADDRESS 109 & 116-130 KANA STREET, MATAURA

KEY:
SITE BOUNDARY
BUILDING PERIMETER

NOTE: BOUNDARY DIMENSIONS APPROXIMATE ONLY

APPROVAL ISSUE

REV	DATE	DRAWN	REVD	APPD	REVISION
B	23.06.14	DGC	RD		APPROVAL ISSUE
A	19.06.14	DGC	RD		CLIENT REVIEW ISSUE

JACOBS

CLIENT: TAHA ASIA PACIFIC LIMITED
PROJECT: LAND USE CONSENTS FOR THE STORAGE OF HAZARDOUS SUBSTANCES
DRAWN: DGC | DRAWING CHK'D: | REVIEWED: | APPROVED:
DESIGNED: RD | DESIGN REVIEW: | DATE: | DATE:

TITLE: MATAURA
KANA STREET SITE PLAN

SCALE: 1:500
DRAWING No: AE04729-NEP-DG-0002
REV: B

DETAILS OF THE APPLICANT

Name of Person, Business or Organisation seeking consent:

Taha Fertiliser Industries Limited

Contact Person (if different to above):

Israel Pankhurst

Contact Address:

162b Bond Row North
West Invercargill
Invercargill 9810

Telephone: 03 2181002

Mobile Phone 027509 3480

Email: israel@tahacorp.com

DETAILS OF THE APPLICATION

Application Location:

109 & 127 Kana Rd,
Mataura
(Paper Mill)

Description of the Proposal

The storage of hazardous goods for fertiliser Manufacture.

Reasons for Resource Consent (Highlight those parts of the proposal requiring approval and the extent of non-compliance with the District Plan)

Hazardous goods storage limit exceeded with class 6 & class 9.
Class 6 allowable quantity 1000 kg
Class 9 allowable quantity 5000 kg.
We currently have 7000 ton of a class 6&9 product called Ouea Premix onsite, & this will increase to a maximum of 10,000 ton, before the fertiliser plant is fully operational.

DETAILS OF THE INFORMATION SUPPLIED

The Applicant must list below the information supplied to the person from whom written approval is being sought

Site Plan
Environmental Management Plan.
Application of Environmental Effects

DETAILS OF PERSON(S) GIVING THEIR WRITTEN APPROVAL

Name of Person, Business or Organisation giving approval:

GREGORY PATERSON (PUBLICK TRUST).

Contact Name (if different to above):

Contact Address:

P.O. Box 43
DUNEDIN

Email Address: gjpaterson@xtra.co.nz

Telephone: 034772640

Mobile Phone 0274730914

GUIDELINES TO PERSONS FROM WHOM WRITTEN APPROVAL IS SOUGHT

1. You do not have to sign this form nor give any reasons for such action to the Applicant. You should however advise the Council of your decision, as this impacts on the processing of the resource consent.
2. You should only sign this form if you are totally satisfied that you fully understand what is being proposed and you have no objection to it.
3. You are entitled to take your time to consider the information being given to you and to seek advice from friends, professional advisers or Council staff.
4. You can ask for changes to the proposal. If the Applicant does not agree you can withhold your approval. Any agreed changes must be in writing, signed by yourself and the by the Applicant and attached to this form.
5. If you require further information, then ask the Applicant for this.
6. Where appropriate, clear plans showing details of the development, including the distance of buildings from boundaries and their dimensions, are required to be seen and signed by you.
7. If you give your approval to the application, Council will not have regard to any effects the proposal may have on you. Once resource consent is granted it is almost impossible to retract it.
8. If you do not give your approval you will have a formal right of objection at a later date should the Applicant proceed through the consent process.
9. If you change your mind after signing this form, your consent may be withdrawn before final determination of the application by advising the Council in writing that your written approval is withdrawn.

If in doubt seek advice before signing this form

CATEGORY OF PERSON(S) GIVING THEIR WRITTEN APPROVAL

Please tick the box(es) below as appropriate;

Owner of property potentially affected by application ..... ☑

Occupier of property potentially affected by application ..... ☑

Statutory Agency ..... ☐

Interest Group ..... ☐

WRITTEN APPROVAL

If the owner or occupier of a property affected by the development for which written approval has been sought, please gfive the address of that property:

.....

121 Kana St, Matawera.

.....

Do you understand fully the proposal and the reasons why resource consent is being sought? (please tick)

Yes ☑ No ☐

Do you give your written approval to the proposal? (please tick)

Yes ☑ No ☐

Have you signed plans showing details of the development? (please tick)

Yes ☑ No ☐

Do you want changes to the proposal or conditions imposed on it? (please tick)

Yes ☐ No ☑

If "yes" include details on a separate sheet and have the Applicant sign their agreement to these.

Signed: .....

Name: .....

Date: .....

Gore District Council
29 Civic Avenue
P O Box 8
GORE
Phone (03) 209 0330
Fax (03) 209 0357
Website www.goredc.govt.nz

Gore District Council

RESOURCE MANAGEMENT ACT 1991
RESOURCE CONSENT AFFECTED PERSONS CONSENT FORM

This form is to be used when Council staff have advised that wri approval is required from persons they consider to be affected by have an interest in, a resource consent application being lodged with Gore District Council.

INSTRUCTIONS TO APPLICANTS

1. The written approval of both the land owner and land occupie required. If that is not provided the application will be notified.
2. Sufficient information must be provided so that the person f whom you are seeking written approval can fully understand proposed development and the impact it will have on them.
3. Clear plans showing details of the development, including distance of any buildings from boundaries and their dimensic are required to be seen and signed by the person giving t written approval. You may wish to check with Council staff that plans being used are acceptable.
4. You must give time for the person receiving the information assess it. That includes providing them with a copy of all relev information to read at their leisure and responding to any que they may have. You should give them with a copy to retain their records.
5. The person you are seeking approval from may request chan to your proposal. If you agree, these are to be recorded in writ signed by both of you and submitted with this form. If you do agree, the person from whom you are seeking approval is at lib to withhold consent.

If Council staff are not satisfied that the information and pl provided is complete and sufficiently clear to enable the per giving their written approval to fully understand its effects, you be required to repeat the process.

SITE PLAN

SCALE 1:500 (A1)

SITE DETAILS

SITE 1	AREA -	8094 m2
LEGAL DESCRIPTION		SECTION 5 BLOCK XVI TOWN OF MATAURA BRIDGE (CT SL41/253)
SITE 2	AREA -	16837 m2
LEGAL DESCRIPTION		SECTION 4 BLOCK XVI ,TOWN OF MATAURA BRIDGE CLOSED RD BLOCK I , TOWN OF MATAURA BRIDGE PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE LOT 1 & PART LOT 2, DP 147 (CT SL81/35)
SITE 3	AREA -	663 m2
LEGAL DESCRIPTION		PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE (CT SL48/22)
SITE 4	AREA -	1366 m2
LEGAL DESCRIPTION		SECTION 10 & PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE (CT SL41/253)
SITE 5	AREA -	582 m2
LEGAL DESCRIPTION		SECTION 12 BLOCK I TOWN OF MATAURA BRIDGE (CT SL238/98)
SITE 6	AREA -	2008 m2
LEGAL DESCRIPTION		SECTION 7 & 8 BLOCK I TOWN OF MATAURA BRIDGE (CT SL7/126)
APPLICANT		TAHA ASIA PACIFIC INDUSTRIES LTD
ADDRESS		109 & 116-130 KANA STREET, MATAURA

KEY:

SITE BOUNDARY

BUILDING PERIMETER

NOTE : BOUNDARY DIMENSIONS APPROXIMATE ONLY

APPROVAL ISSUE

REV	DATE	DRAWN	REVD	APPD	REVISION
B	23-09-14	DCC	TD		APPROVAL ISSUE
A	16-08-14	DCC	TD		CLIENT REVIEW ISSUE

DRAWING NUMBER | REFERENCE DRAWING TITLE

JACOBS

Level 2, 86 Customhouse Quay, WELLINGTON 6011, NEW ZEALAND
Tel: +64 4 473 4265, Fax: +64 4 473 3369, Web: www.jacobs.com

CLIENT: TAHA ASIA PACIFIC LIMITED

PROJECT: LAND USE CONSENTS FOR THE STORAGE OF HAZARDOUS SUBSTANCES

DRAWN	DRAWING CHECK	REVIEWED	APPROVED
DCC	TD		
DESIGNED	DESIGN REVIEW	DATE	DATE
TD			

TITLE: MATAURA
KANA STREET SITE PLAN

SCALE: 1:500 | DRAWING No: AE04729-NEP-DG-0002 | REV: B

DATE: 23/09/2014 12:46:28 PM LOGIN NAME: CONNOR, DAVID C
LOCATION: C:\Users\dconnor\Documents\Projects\AE04729 - TAHA\AE04729-NEP-DG-0002.dwg

NZ **TRANSPORT** AGENCY
WAKA KOTAHI

Level 2, AA Centre
450 Moray Place
PO Box 5245
Moray Place
Dunedin 9058
New Zealand
T 64 3 951 3009
F 64 3 951 3013
www.nzta.govt.nz

03 October 2014

Jacobs New Zealand Limited
PO Box 10-283
WELLINGTON 6143

Attention: Tess Drewitt

Dear Tess

Taha Fertliser Industries Limited – Fertiliser Processing Plant - SH 93 - Mataura

Thank you for forwarding details of the above-mentioned land use proposal for our consideration and comment. We understand the applicant proposes to operate a fertiliser processing plant at 109 and 116-130 Kana Street, Mataura.

We are satisfied that the proposed activity is unlikely to have an adverse effect on the safety and functionality of the State highway adjacent to the subject site. Accordingly, please find enclosed the NZ Transport Agency's written approval to your proposed activity for your information and further action.

Please do not hesitate to contact me if you have any queries regarding the above information.

Yours sincerely

Tony MacColl
Senior Planning Advisor

cc SNM - Southland
Opus International Consultants, PO Box 647, Invercargill

File Ref: RM/14/71/93/214063

SITE PLAN
SCALE 1:500 (A1)

SITE DETAILS

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LEGAL DESCRIPTION		SECTION 10 & PART SECTION 11 BLOCK I TOWN OF MATAURA BRIDGE (CT SL41/253)
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LEGAL DESCRIPTION		SECTION 12 BLOCK I TOWN OF MATAURA BRIDGE (CT SL238/98)
SITE 6	AREA –	2008 m2
LEGAL DESCRIPTION		SECTION 7-8 BLOCK I TOWN OF MATAURA BRIDGE (CT SL7/126)
APPLICANT		TAHA ASIA PACIFIC INDUSTRIES LTD
ADDRESS		109 & 116-130 KANA STREET, MATAURA

Approved
Tony MacColl
Senior Planning Advisor
Southern Region - Dunedin
NZ Transport Agency
3.10.14

KEY:
SITE BOUNDARY
BUILDING PERIMETER

NOTE : BOUNDARY DIMENSIONS APPROXIMATE ONLY

APPROVAL ISSUE

REV	DATE	DRAWN	REVD	APPD	REVISION
B	23-09-14	DCC	TD	NC	APPROVAL ISSUE
A	16-08-14	DCC	TD		CLIENT REVIEW ISSUE

DRAWING NUMBER | REFERENCE DRAWING TITLE

JACOBS
Level 3, 99 Customhouse Quay, WELLINGTON 6011, NEW ZEALAND
Tel: +64 4 473 6265, Fax: +64 4 473 3369, Web: www.jacobs.com

CLIENT	TAHA ASIA PACIFIC LIMITED
PROJECT	LAND USE CONSENTS FOR THE STORAGE OF HAZARDOUS SUBSTANCES
DRAWN: DCC	DRAWING CHECK: TD
DESIGNED: TD	DESIGN REVIEW: NC
REVIEWED: NC DATE: 23-09-2014	APPROVED: NC DATE: 23-09-2014

TITLE: MATAURA
KANA STREET SITE PLAN

SCALE: 1:500 | DRAWING No: AE04729-NEP-DG-0002 | REV: B

GORE DISTRICT COUNCIL

AFFECTED PERSON(S) CONSENT FORM

To: Resource Consents Section
Gore District Council
P O Box 8
GORE

Tony MacColl
Senior Planning Advisor
Southern Region - Dunedin
~~NZ Transport Agency~~

I/We _____

(full names)

being the . owner

. occupier

owner and occupier

of the property situated at State Highway 93 (SH93)

(address and/or legal description of your property)

have read and understand the information on the reverse side of this page and consent to the proposal by:

Taha Fertiliser Industries Limited
(name of applicant(s))

to: Operate a fertiliser processing plant

(description of proposed activity)

on the following property: 109 and 116-130 Kana Street (SH93) Mataura

(address of application site)

as outlined in the application submitted and on the associated plans signed by me/us.

Signed: _____

Date: 3-10-14 **Telephone:** 03 951 3009

If you have any queries regarding the Resource Consent process and the role and rights of adversely affected person(s), please contact:

Resource Consents Section
Gore District Council
P O Box 8
Gore

Telephone: (03) 208 9080
Facsimile: (03) 208 8875

before you complete and sign this form and the associated plans.

Appendix G. Consultation

Issue/Concern	How addressed by Taha	Outstanding tasks	Timeframe
Odour experienced by neighbouring properties • Neighbour complained of odour at 3am, causing sore throat and headaches. • History with tannery on the site causing odour has caused concern of repeat experience.	• The only odour associated with the storage of Ouvea Premix will be the smell of ammonia gas if the product gets damp. As it is not anticipated the product will get damp (through measures specified in the AEE), it is not anticipated there will be any odour. • If the odour experienced by neighbours does not smell of ammonia gas, it cannot be coming from Taha's product. • Taha requests locals contact them in an odour event so a representative could conduct ammonia gas testing to verify the source. • Taha has provided more information on the nature of the product, including odours, in the AEE.	None.	N/A
Employment opportunities • Community interested in employment opportunities.	As the proposal is only for storage, the activity is unlikely to generate any additional employment opportunities.	None.	N/A
Building suitability – Community questioned the suitability of the building with regards to – • Asbestos • Earthquake standard • Building WOF	• The building is considered fit for purpose. • The landowner has made a number of upgrades to the building, as outlined in section 2.4 of the AEE. • A structural engineer has assessed the building a structurally fit for purpose.	Taha is working with the landowner to finalise the building report as part of the risk assessment.	Building report to be finalised in April 2015.
Trucking activities • Community concerns about loading/unloading on the main road, including trucks not properly parked off the road, and causing disruption to the main road.	Taha is not aware of any issues with the trucking companies when the material was unloaded to the site.	Once the material is ready to be removed from the site, Taha will engage with trucking companies to ensure material is removed in a safe way.	Dependent on processing.
Retrospective consent • Possibility to remove product prior to obtaining consent • How much can be removed and	Taha investigated the feasibility of removing product prior to obtaining the resource consent. While it is not possible for Taha to remove product at this time, Taha will start to remove product as soon as a processing facility	Taha to keep the community informed on timeframes for removal.	Ongoing.

Issue/Concern	How addressed by Taha	Outstanding tasks	Timeframe
when?	is secured.		
Other possible locations for storage and processing • Smelter? • Invercargill?	Taha has considered moving the material to a different site, however this is not feasible at this stage.	Should the consent be declined, Taha will identify other suitable sites for the product.	Dependent on resource consent application.
Product leaching into the river • Effects on aquatic ecology • Consultation with Fish & Game	Taha has focussed on prevention. The AEE has not addressed the potential effects of flooding/spillage on the aquatic environment as this is considered extremely unlikely.	Taha will provide a risk assessment as part of the resource consent application that will address potential for aquatic effects.	Report to be provided to GDC in April 2015.
Storing material in a floodway • What would happen if there was a flood?	Flood protection measures will prevent water entering the building in a large flooding event.	Taha will provide a risk assessment as part of the resource consent application that will address flooding potential.	Report to be provided to GDC in April 2015.
Gravel bar in river to the north of a site • How will this affect flooding on the site?			
Effects on processing/production on ambient air quality	Taha is no longer proposing to process Ouvea Premix on site.	None.	N/A
Ammonia gas emissions when product gets damp: • Water getting into bags during loading/unloading • Community highlighted concern that loading/unloading was witnessed during wet weather.	Bags will be closed during loading so there is no possibility for water to enter the bags. This is assessed in section 5.3 of the AEE.	Taha will confirm this with the trucking company, including ensuring product is not being loaded in wet conditions.	Dependent on processing.
More information on the nature of the product requested Community requested more information on the product to better understand the risks	Information on the nature of the product is provided in the AEE and appendices. In particular, Appendix C includes the Material Data Safety Sheet (MSDS) for Ouvea Premix.	None	N/A
Effects of fertiliser on soil	Taha is currently undergoing testing of the product.	Taha will provide information once this testing is complete.	Ongoing

Issue/Concern	How addressed by Taha	Outstanding tasks	Timeframe
Clarification on what ES is currently monitoring in the Mataura River (concerns ES is monitoring for cyanide)	There will be no cyanide in the water as a result of storage.	None.	N/A
Public liability following an incident	Taha confirmed it has liability insurance, but was unsure what the level of insurance is.	Taha will clarify the level of insurance.	To be provided.
Potential health effects • Concerns over what happened in Edendale • Implications on proximity • Do truck drivers where respirators?	• There was no evidence of causation in Edendale. • MSDS provides safety information for Ouvea Premix. • AEE has been updated to provide more information on the nature and characteristics of Ouvea Premix.	More information to be provided in the risk assessment.	Risk assessment provided to GDC in April 2015.
Property valuations	Given environmental effects are minimal, the proposal is not expected to have any effect on property valuations.	None.	N/A
Fire	Product is inflammable and fire consultant has been engaged to assess fire risk on site. More information on the nature of the product has been provided in the AEE.	None.	N/A
Noise 24 hours / day?	Operation will produce minimal noise effects, as provided in the AEE. The storage facilities will only be accessed during 9am-5pm on week days, unless in an emergency.	None.	N/A
On-going consultation	Taha is available to respond to queries and community concerns throughout the submissions period. People should contact: • Maurice Shaw 021 550 218, maurice@tahacorp.com; or • Nathan Burgess, 027 230 8663, Nathan@tahacorp.com	None	N/A