



# Annual Compliance Audit Report

## AFFCO Imlay Whanganui

Consent  
ATH-2009010853.00  
ATH-2011014183.01

Reporting Period  
1 May 2020- 30 April 2024

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	<b>Marion</b> 19 Hammond Street		<b>Whanganui</b> 181 Guyton Street		<b>Woodville</b> 116 Vogel Street
	<b>Taumarunui</b> 34 Maata Street				

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## 2. EXECUTIVE SUMMARY

This report assesses the AFFCO NZ Limited (AFFCO) Imlay Plant's performance against the requirements of the following resource consents:

- *ATH-2009010853.00 to abstract groundwater from four bores for Lamb and Beef Abattoir Water supply and Wash-down purposes at the AFFCO site, Imlay Place - Whanganui*
- *ATH-2011014183.01 to abstract groundwater from one bore for Lamb and Beef processing and cooling water purposes at the AFFCO site, Imlay Place - Whanganui*

This assessment has been primarily conducted as a desktop study utilising material submitted within the "AFFCO Imlay Water Take Monitoring Report – 1 May 2020 to 30 April 2024".

As a result of this assessment AFFCO Imlay has been given the overall compliance ratings:

- *ATH-2009010853.00 – Low Risk Non-Compliance*
- *ATH-2011014183.01 – Low Risk Non-Compliance*

A summary of the non-compliances identified for each consent is presented below:

### ATH-2009010853.00

- *Condition 1: Activities were not undertaken within accordance of consent;*
- *Condition 5: Calibration inconsistencies'; and*
- *Condition 13: Annual Report provided after 30 May on two occasions.*

### ATH-2011014183.01

- *Condition 1: Activities were not undertaken within accordance of consent;*
- *Condition 4: Calibration inconsistencies'; and*
- *Condition 8: Calibration inconsistencies'.*

### **3. BACKGROUND**

The freezing works site, now referred to as the AFFCO-Imlay operation, and was first established in 1916. The site is situated adjacent to the Whanganui River, in the residential suburb of Gonville where other large industrial businesses such as Open Country Dairy operate.

The AFFCO Plant undertakes a variety of activities that can, and does, lead to numerous reverse sensitivity adverse effects leading to a constant tension between AFFCO Imlay, surrounding residents and local Iwi.

The activities include, but are not limited to:

- Collection, storage and processing of offal, including from other large processing sites, through an onsite Rendering Plant,
- Gas fired boilers,
- Large onsite biofilters, which treat odour from the onsite rendering plant before it is discharged to air,
- Refrigeration, which uses large volumes of ammonia,
- Stormwater discharge to the tidal flats of the Whanganui River.
- Stockyards.
- Water takes for onsite processing

The current water take resource consents (ATH-2007010926.01 and ATH-2017201595.00) were granted in December 2018 and are due to expire 1 July 2025. These consents were subject to a fully notified process under the Resource Management Act 1991 (RMA), with a number of submissions being made. The primary concern for both the submitters and Horizons Regional Council (Horizons) was how the site would be managed to ensure objectionable odours beyond the property did not occur.

The current groundwater abstraction resource consent (ATH-2009010853.00) was granted in September 2009 and expired in July 2019. An application to renew for a term of 35 years was submitted in December 2018. This application was delayed awaiting further information which has now been obtained and the application has resumed being processed by Horizons.

The current stormwater discharge resource consents (ATH-2011012104.00 and ATH-2011012105.00) were granted November 2011 and expire 1 July 2035.

#### **2.1.1. Site**

The term 'site' refers to the AFFCO - Imlay plant on land legally described as Lot 1 DP 500721 at approximate map reference NZTopo50: BL32:729-757 and as shown on Map LOC - 0000063717.

It is zoned as "General Industrial Zone" within the Whanganui District Plan - Operative May 2023 and surrounded by other industrial sites and the residential zone of Gonville.





Figure 1: Overview of Affco Imlay site. Image courtesy of Local Maps, Retrieved 17 October from <https://gis.horizons.govt.nz/Viewer/?map=f82772286fb743d686a5ca4280be1ef1>

## 4. SCOPE OF THE REPORT

The scope of this report combines a review and annual audit of AFFCO NZ Limited (Affco) Imlay Plant's performance for the period 1 May 2020 to 30 April 2024 against the requirements of the following resource consents:

- *ATH-2009010853.00 to abstract groundwater from four bores for Lamb and Beef Abattoir Water supply and Wash-down purposes at the AFFCO site, Imlay Place - Whanganui*
- *ATH-2011014183.01 to abstract groundwater from one bore for Lamb and Beef processing and cooling water purposes at the AFFCO site, Imlay Place - Whanganui*

The annual audit assessment has been primarily conducted as a desktop study utilising material submitted within the "AFFCO Imlay Annual Water Take Monitoring Report – 2020-2024."

Note: Wells 4 and 5 were decommissioned in 2026.

Note: Annual Report entail: Water Take monitoring reports covering 1 May 2020- 30 April 2021, 1 May 2021- 30 April 2022, 1 May 2022- 30 April 2023, 1 May 2023- 30 April 2024.

## 5. GENERAL ASSESSMENT OF CONDITIONS APPLICABLE TO ATH-2009010853.00

The following are the conditions assessed for this report including the assessment and compliance ratings:

1. *The location, design, implementation and operation of the abstraction shall be in general accordance with the consent application and its associated plans and documents first lodged with Manawatu-Wanganui Regional Council on 15 November 2004, and further information received on:*
  - a. *31 October 2005, "Testing of B4 Aquifer, Imlay Plant" prepared by Terra Aqua Consultants; and*
  - b. *23 May 2008, "Pumping test evaluation and assessment of effects in relation to bores situated at Affco Imlay – Wanganui" compiled by Ricky Gowan - Imlay Compliance Manager; and*
  - c. *15 July 2008, letter in response to Section 92 Further Information request, details of well logs, water demand assessment, and well assessment, from Ricky Gowan – Compliance Manager, Affco Imlay.*

*Where there may be contradiction or inconsistencies between the application and further information provided by the applicant, the most recent information applies. In addition, where there may be inconsistencies between information provided by the applicant and conditions of the resource consent, the conditions of the resource consent apply.*

**Advice Note:** *Any change from the location, design concepts and parameters, implementation and/or operation may require a new resource consent or a change of consent conditions pursuant to Section 127 of the Resource Management Act 1991.*

The location, design and implementation of abstraction have been in accordance with this condition with the exception of maintaining a calibrated flowmeter at all times as required by condition 5, therefore, this condition is rated as Low Risk Non-Compliance.

### Condition Compliance Status: Low Risk Non-Compliance

2. *The maximum abstraction of groundwater shall not exceed 42,000 cubic metres per week (42,000 m<sup>3</sup>/week) in total from Well Nos. 1, 2, 4 and 5 on the property legally described as Lot 2 DP 394218.*

Affco have provided within Annual Reports, 2020-2024, weekly abstraction volumes, against consent limits. During the assessment period, AFFCO abstractions are well below the limit specified above. Affco's maximum abstraction occurred on 12/12/2022 being 7347m<sup>3</sup>/week combined for both well 1 and 2.

### Condition Compliance Status: Comply – Full

3. *Subject to Condition 2 the maximum daily abstraction rate of this resource consent shall not exceed 5,000 cubic metres (5,000 m<sup>3</sup>/day) in combination or individually from Wells 1, 2 and 4 and 1,000 cubic metres (1,000 m<sup>3</sup>/day) from Well 5.*

As detailed in the Annual Reports (2020-2024) provided. AFFCO daily abstraction volumes have been well within the 5,000m<sup>3</sup> limit, with a maximum volume abstracted being 1050m<sup>3</sup> on 12 December 2022.

### Condition Compliance Status: Comply – Full

4. *Within 4 months of commencement of this resource consent (by 29 January 2010), the consent holder shall install and maintain, in a fully operational condition, a GPRS data logger / telemetry unit compatible with the Manawatu-Wanganui Regional Council's Telemetry system on the water abstraction lines traceable to +/- 5 % or better. This unit, which is attached to the pulse counter output, will be monitored by the Manawatu-Wanganui Regional Council to ensure compliance with the resource consent conditions and as part of a programme to enable monitoring of total catchment water use.*

**Advice Note:** *The Manawatu-Regional Council are committed to providing reasonable assistance to consent holders and has at the time of granting this consent has programme for supplying telemetry units for sizeable water takes. In this situation if more telemetry units are required it is the responsibility of the consent holder to install any additional telemetry units in order to ensure Condition 4 is complied with.*

Water abstraction volumes are sent through to Horizons and monitored by the Environmental Data Team. Additionally Horizons undertaken yearly inspections of the telemetry units to ensure the above parameters are being met.

### Condition Compliance Status: Comply – Full

5. *Within 4 months of commencement of this resource consent (by 29 January 2010), the consent holder shall install and maintain, in a fully operational condition, a flow meter on the water abstraction line of each well with a pulse counter output traceably calibrated to +/- 5 % or better. The flow meter shall be capable of providing daily water use as well as a pulse counter output. The flow meter shall be positioned to measure the entire volume abstracted under authorisation of this consent, before water enters any storage facility.*

**Advice Note:** *The above condition requires that a meter be installed for each well, therefore 5 meters in total are required. To ensure this condition is complied with it is recommended that the flow meters be mounted so as to avoid the effects of pump vibration from interfering with the accuracy and calibration of the water meter.*



Flowmeters are installed on bores 1 and 2 (4 and 5 are decommissioned). Bores 1 and 2 were last certified on 8 July 2021, confirming +5% calibration. Certification is therefore valid for the next 5 years. Horizons Environmental Data Team undertake annual inspections of bores 1 and 2. During the reporting period and on several occasions calibrations have failed, however, the most recent test undertaken 18 September 2024, passed inspection. Due to the non-compliances of several calibration errors during the assessment period a Low Risk Non-Compliance rating has been given.

**Condition Compliance Status: Low Risk Non-Compliance**

6. *The flow meters referred to in Condition 5 shall be positioned within straight lengths of steel pipe of uniform wall thickness (excluding flanges) before and after the meter.*

Inspection notes from Horizons hydro monitoring team as well as an inspection undertaken on 23 January 2025 indicate steel pipe thickness positioned before and after both bore meters.

**Condition Compliance Status: Comply - Full**

7. *For the purpose of the clause of Condition 5 and 6, the pipes on either side of the flow meter shall be of equal diameter. The length of straight pipe before and after the flow meter shall be the greater of:*
  - *10 times the external diameter of the pipe before the meter’s inlet flange and five times the external diameter of the pipe after the meter’s outlet flange;*
  - *1.5 m before the flow meter inlet flange and 0.75 m of pipe after the flow meter*
  - *outlet flange; and*
  - *the length of pipes specified by the flow meter manufacturer to enable accurate flow measurement to be achieved.*

**Advice Note:** *Spiral welded pipe will not meet the “uniform” wall thickness specifications above.*

Pump verification certificates previously provided by AFFCO confirms the distances of unobstructed pipe both before and after the each meter. In each case the above requirements for the condition above. The diameter of the pipe is approximately 100 mm.

*Table 1: Pipe Lengths before and after meter for bores 1 and 2.*

Pump Number	Length of Pipe before meter (mm)	Length of Pipe after meter (mm)
1	1500	1100

2	1500	1100
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**Condition Compliance Status: Comply- Full**

8. *Prior to exercising this consent, the consent holder shall install and maintain, in fully operational condition, an automatic backflow prevention device within the pump outlet plumbing or within the mainline to prevent the backflow of water through the meter referred to in Condition 5 of this consent.*

In previous reports it was stated that backflow prevention devices were not necessary due to the discharge pipe being elevated above the reservoir. Therefore the air gap provides the backflow prevention.

However, if a Backflow preventer is specified then a backflow preventer is required to have been installed. Therefore, Horizons are currently in discussion with both Affco and Horizons Environmental Data Team regarding this condition. This was to be assessed in the next period.

**Condition Compliance Status: Not Assessed**

9. *The consent holder shall provide the Manawatu-Wanganui Regional Council staff and its agents with reasonable access to the monitoring equipment to enable monitoring of water use.*

The flowmeters on the site are easily accessible to Horizons staff for the purpose of monitoring water use.

**Condition Compliance Status: Comply –Full**

10. *In the event that the equipment detailed in Conditions 4, 5 and 8 fails, replacement or repair will be at the consent holder's expense and replacement or repair is required within seven days.*

Annual reports for the assessment period state no maintenance has been undertaken on the wells.

**Condition Compliance Status: Not Applicable**

11. *In the event that the equipment required under Conditions 4, 5 and 8 is removed for servicing or replacement the consent holder shall notify the Manawatu-Wanganui Regional Council's Environmental Protection Manager within one working day and keep daily records of the volumes and rates of water abstracted under this resource consent. These records shall be submitted to the Manawatu-Wanganui Regional Council on a weekly basis until the equipment is reinstalled or replaced.*

**Advice Note:** *The Manawatu-Wanganui Regional Council's Environmental Protection Manager can be contacted on 0508 800 800.*

No maintenance was required for the assessment period.

**Condition Compliance Status: Not Applicable**

*12. By 1 February 2010 the consent holder shall prepare a water management /well operation plan. The plan shall include, but not be limited to:*

- a. efficiency of use and water conservation measure undertaken on the site; and*
- b. maintenance of wells on the site.*

*The water management / well operation plan shall be submitted to the Manawatu-Wanganui Regional Council Environmental Protection Manager.*

Affco previously supplied the Water Management Plan in April 2010, therefore this is a historic condition.

**Condition Compliance Status: Not Applicable (Historic)**

*13. By 30 May each year, commencing May 2010, the consent holder shall submit an annual monitoring report for the year ending 30 April. The monitoring report shall include, but not be limited to:*

- a. a summary of weekly abstraction volumes, in total and from each well; and*
- b. annual production figures (processed through the plant); and*
- c. an assessment of efficiency of water use including any best management practice with regards to water conservation; and*
- d. any maintenance undertaken on the wells; and*
- e. reviewing and if necessary updating to the water management / well operation plan.*

*The report shall be submitted to the Manawatu-Wanganui Regional Councils Environmental Protection Manager.*

A table below summarises reports being submitted during the assessment period.

*Table 2: Annual report Submission timeframe*

<b>Assessment Period report</b>	<b>Date provided by Affco</b>
2020-2021	29 June 2022

2021-2022	29 June 2022
2022-2023	17 May 2023
2023-2024	8 May 2024

Due to two Annual reports being submitted after 30 May, a Low Risk Non-Compliance rating has been given.

#### Condition Compliance Status: Low Risk Non-Compliance

*14. The Manawatu-Wanganui Regional Council may, under Section 128 of the Act, initiate a review of all conditions of this consent annually in the month of July commencing **July 2010**. The review shall be for the purpose of reviewing the effectiveness of the conditions in avoiding, or mitigating any adverse effects on the environment, which may arise as a result of the exercise of this resource consent.*

- a. The review may be necessary to:*
  - b. assess the water abstraction volumes and rates detailed in the conditions of this consent with a future allocation policy, and if necessary change the monitoring outlined in the conditions of the consent;*
  - c. ii. delete or amend conditions of this resource consent to ensure adverse effects are appropriately mitigated; or*
  - d. iii. add new conditions as necessary, to avoid, remedy or mitigate any unforeseen adverse effects on the environment; or*
  - e. iv. adopt, if necessary and appropriate, best practicable options to avoid, remedy or mitigate any adverse effects on the environment.*

***Advice Note:** Any review exercised under this condition may result in the abstraction volume and / or rate being reduced and / or restricted, or further restrictions being placed on the abstraction volume and / or rate during low flow conditions. Efficiency of the take and application method will be taken into account in the review.*

#### Condition Compliance Status: Not Applicable

#### Overall Compliance Rating for Resource Consent: Low Risk Non-Compliance

## 6. GENERAL ASSESSMENT OF CONDITIONS APPLICABLE TO ATH-2011014183.01

The following are the conditions assessed for this report including the assessment and compliance ratings

1. *The consent holder shall undertake the activity in general accordance with the consent application including all accompanying plans and documents first lodged with Manawatu-Wanganui Regional Council on 30 September 2011. In addition, where there may be inconsistencies between information provided by the applicant and conditions of the resource consent, the conditions of the resource consent apply.*

*Advice note: Any change from the location, design concepts and parameters, implementation and / or operation may require a new resource consent or a change of consent conditions pursuant to section 127 of the Resource Management Act 1991.*

Activities of the artesian bore abstraction have not been undertaken within accordance of this condition as detailed in condition 4, calibrations have been non-compliant on several occasions during the assessment period therefore, this condition is rated as low risk non-compliance.

**Condition Compliance Status: Low Risk Non-Compliance**

2. *This consent authorises the abstraction of groundwater from Well Number 790083 at approximate map reference NZMS260 R22:832-373 - NZTopo50 BL32:732-756 on the property legally described as Lot 2 DP 420707.*

Horizons acknowledge abstractions are undertaken at the map location referenced.

**Condition Compliance Status: Comply – Full**

3. *The maximum daily abstraction of ground water shall not exceed 960 cubic metres per day (960 m<sup>3</sup>/day).*

Observations of data supplied by the Horizons Environmental Data Team showed the maximum groundwater take did not exceed 960m<sup>3</sup>/day during the assessment period.

**Condition Compliance Status: Comply – Full**

4. *The consent holder shall maintain, in a fully operational condition, a flow meter on the water abstraction line with a pulse counter output traceably calibrated to +/-5% or better. The flow meter shall be capable of providing daily water use as well as a pulse counter output. The flow meter shall be positioned to measure the entire volume abstracted under authorisation of this consent, before water enters any storage facility.*

**Advice note:** To ensure this condition is complied with it is recommended that the flow meter be mounted so as to avoid the effects of pump vibration from interfering with the accuracy and calibration of the water meter.

The Artesian bore was last calibrated on 8 July 2021, confirming it met the +/-5% calibration accuracy. Certification is therefore valid until July 2026. Horizons Environmental Data Team has undertaken several inspections of the artesian bore to confirm accuracy. Unfortunately during the reporting period and on several occasions calibrations have failed, however, the most recent test undertaken 18 September 2024, passed inspection. Due to the non-compliances of failed calibrations during the assessment period a Low Risk Non-Compliance rating has been given.

**Condition Compliance Status: Low Risk Non-Compliance**

- 5. *The flow meter referred to in Condition 4 shall be positioned within straight lengths of steel pipe of uniform wall thickness (excluding flanges) before and after the meter.*

Inspection notes from Horizons hydro monitoring team as well as an inspection undertaken on 23 January 2025 indicate steel pipe thickness positioned both before and after both the flowmeters.

**Condition Compliance Status: Comply – Full**

- 6. *Subject to the flow meter requirements in Conditions 4 and 5 above the pipes on either side of the flow meter shall be of equal diameter. The length of the straight pipe before and after the flow meter shall be the greater of:*
  - a. *10 times the external diameter of the pipe before the meter’s inlet flange and 5 times the external diameter of the pipe after the meter’s outlet flange;*
  - b. *1.5m before the flow meter’s inlet flange and 0.75m of pipe after the flow meter’s outlet flange; and*
  - c. *The length of pipes specified by the flow meter manufacturer to enable accurate flow measurements to be achieved.*

**Advice note:** *Spiral welded pipe will not meet the ‘uniform’ wall thickness specifications above.*

Pump verification certificates previously provided by AFFCO confirms the distances of unobstructed pipe both before and after the flowmeters.

*Table 3: Pipe Lengths before and after meter for Artesian bore*

Length of Pipe before meter (mm)	Length of Pipe after meter (mm)
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1100	550
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**Condition Compliance Status: Comply – Full**

- 7. The consent holder shall install and maintain, in fully operational condition, an automatic backflow prevention device within the pump outlet plumbing or within the mainline to prevent the backflow of water through the meter referred to in Condition 4 of this consent.*

Previous inspections have identified that a backflow prevention device is not required within this pump outlet due to the physical break within the pipe.

However, if a Backflow preventer is specified then a backflow preventer is required to have been installed. Therefore, Horizons are currently in discussion with both Affco and Horizons Environmental Data Team regarding this condition. This was to be assessed in the next period.

**Condition Compliance Status: Not Assessed**

- 8. The consent holder shall install and maintain, in a fully operational condition, a GPRS data logger / telemetry unit compatible with the Manawatu-Wanganui Regional Council's Telemetry system on the water abstraction line traceable to +/- 5 % or better. This unit, which is attached to the pulse counter output, will be monitored by the Manawatu-Wanganui Regional Council to ensure compliance with the resource consent conditions and as part of a programme to enable monitoring of total catchment water use.*

[Condition amended as per decision 106039/1 dated 19 March 2012]

Telemetry was installed by Horizons Environmental Data Team on 22 June 2012. The flowmeter was last certified on 8 July 2021, confirming +/-5% accuracy. Certification is valid until July 2026. Horizons undertake inspections of the artesian bore which on several occasions bore calibrations have failed, however, the most recent test undertaken 18 September 2024, passed inspection. Due to several non-compliances due to failed calibrations during the assessment period a low risk non-compliance rating has been given.

**Condition Compliance Status: Low Risk Non-Compliance**

- 9. The consent holder shall ensure the monitoring equipment referred to in Conditions 4, 7 and 8 of this consent is in a position where it is accessible at all times.*

Previous inspections have identified that the equipment is in a position where it is accessible at all times.

**Condition Compliance Status: Comply – Full**

- 10. The consent holder shall allow any Manawatu-Wanganui Regional Council staff member and its agents to attach monitoring equipment/telemetry to monitor water use to ensure compliance with consent conditions.*

Horizons staff and their agents have not had any issues with getting access to the equipment to carry out the activities listed above.

**Condition Compliance Status: Comply – Full**

11. *In the event that the equipment detailed in Conditions 4, 7 and 8 of this consent fails, replacement or repair will be at the consent holder's expense and replacement or repair will be required within seven days.*

*Advice note: The Manawatu-Wanganui Regional Environmental Protection Manager can be contacted on 0505 800 800.*

No repairs or replacements have been undertaken during the assessment period. Horizons has not received any notifications of any equipment failures over this assessment period.

**Condition Compliance Status: Not Applicable**

12. *In the event that the equipment required under Conditions 4, 7 and 8 of this consent is removed for servicing or replacement the consent holder shall notify the Manawatu-Wanganui Regional Council's Environmental Protection Manager within one working day and keep daily records of the volumes and rates of water abstracted under this resource consent. These records shall be submitted to the Manawatu-Wanganui Regional Council on a weekly basis until the equipment is reinstalled or replaced.*

*Advice note: The Manawatu-Wanganui Regional Environmental Protection Manager can be contacted on 0505 800 800.*

Horizons has not received any notifications of any equipment failures over this assessment period.

**Condition Compliance Status: Not Applicable**

13. *The Manawatu-Wanganui Regional Council may, under section 128 of the Act, initiate a review of all conditions of this consent during July 2018. The review shall be for the purpose of reviewing the effectiveness of the conditions in avoiding, or mitigating any adverse effects on the environment, which may arise as a result of the exercise of this consent. The review of conditions shall allow for:*

- i. *an assessment of the water abstraction volumes and rates detailed in the conditions of this consent against any future allocation policy, and if necessary a change to the monitoring outlined in the conditions of the consent;*
- ii. *deletion or amendments to any conditions of this resource consent to ensure adverse effects are appropriately mitigated; or*
- iii. *addition of new conditions as necessary, to avoid, remedy or mitigate any unforeseen adverse effects on the environment; or*

- iv. *if necessary and appropriate, the adoption of the best practicable options to avoid, remedy or mitigate any adverse effects on the environment.*

*Advice note: Any review exercised under this condition may result in the abstraction volume and / or rate being reduced and / or restricted, or further restrictions being placed on the abstraction volume and / or rate during low flow conditions. Efficiency of the take and application method will be factors that will be taken into account in the review.*

Horizons has no current intentions to initiate a review of the conditions within this consent.

**Condition Compliance Status: Not Applicable**

- 14. *The consent holder shall measure groundwater levels (under both static and pumping conditions) and the electrical conductivity of the pumped water in January, April and October each year that Well Number 790083 is in use. The measurements shall be recorded in a log book and provided to the Manawatu-Wanganui Regional Council's Environmental Protection Manager within 5 working days of the measurements being made. If these measurements show a 50% increase in electrical conductivity from any earlier measured value, or an electrical conductivity value greater than 500  $\mu\text{S}/\text{cm}$  then the more detailed monitoring described in Conditions 15 and 16 must be undertaken.*

*[Condition added as per decision 106039/1 dated 19 March 2012]*

Affco have advised bore volumes, groundwater levels, electrical conductivity are sent to Horizons via telemetry therefore no log book are being recorded onsite. Affco have also detailed that it is unclear from observing 'water matter's data where electrical conductivity information is located. Horizons are currently in contact with their Hydro and data team to ensure records for groundwater and electrical conductivity are being recorded via telemetry. Therefore this condition will be assessed within the next monitoring period.

**Condition Compliance Status: Not Assessed**

- 15. *Subject to Condition 14, the consent holder shall measure groundwater levels and electrical conductivity in Well Number 790083 on a continuous basis and shall provide this information by way of telemetry (referred to in Condition 8) to the Manawatu-Wanganui Regional Council's Environmental Protection Manager.*

*Advice note: The Environmental Protection Team can be contacted at the following number 0508 800 800, or at [compliance.shared@horizons.govt.nz](mailto:compliance.shared@horizons.govt.nz).*

*[Condition added as per decision 106039/1 dated 19 March 2012]*

As stated in condition 14, it is unclear if groundwater levels and electrical conductivity information is being recorded and will be assessed within the next assessment period.

**Condition Compliance Status: Not Assessed**

16. Subject to Condition 14, the consent holder shall, for the duration of the consent, collect one water sample in each of the months of July, October, January and April from Well Number 790083. This sample shall be analysed for the parameters listed in Table 1 below. The consent holder shall also have a laboratory analysis undertaken for the ionic balance of the sampled water.

Table 1: Water Quality Parameters

Parameter	Units
pH	
Calcium	ppm Ca <sup>2+</sup>
Magnesium	ppm Mg <sup>2+</sup>
Sodium	ppm Na +
Potassium	ppm K +
Iron	ppm Fe <sup>2+</sup>
Manganese	ppm Mn <sup>2+</sup>
Boron	ppm B <sup>3+</sup>
Silica	ppm SiO <sub>2</sub>
Sulphate	ppm SO <sub>4</sub> <sup>2-</sup>
Chloride	ppm Cl -
Carbonate	ppm CO <sub>3</sub> <sup>2-</sup>
Bicarbonate	ppm HCO <sub>3</sub> <sup>-</sup>

*Advice note: The ionic balance should not have a discrepancy of greater than 5%.*

*[Condition added as per decision 106039/1 dated 19 March 2012]*

As stated in condition 14, it is unclear if groundwater levels and electrical conductivity information is being recorded and will be assessed within the next assessment period.

**Condition Compliance Status: Not Assessed**

17. The consent holder shall, in circumstances when the electrical conductivity measured under Condition 14 of this consent:

- a. exceeds 750  $\mu\text{S}/\text{cm}$ , immediately decrease its daily abstraction volume to a maximum of 2,600 m<sup>3</sup>/day;
- b. exceeds 850  $\mu\text{S}/\text{cm}$ , immediately decrease its daily abstraction volume to a maximum of 1,300 m<sup>3</sup>/day; and
- c. exceeds 1,000  $\mu\text{S}/\text{cm}$ , immediately cease its abstraction.

*The consent holder shall not resume the abstractions allowed under Condition 2, until written notification from the Manawatu-Wanganui Regional Council's Environmental Protection Manager has been received confirming abstraction can continue.*

*[Condition added as per decision 106039/1 dated 19 March 2012]*

As stated in condition 14, it is unclear if groundwater levels and electrical conductivity information is being recorded and will be assessed within the next assessment period.

**Condition Compliance Status: Not Assessed**

**Overall Compliance Rating for Resource Consent: Low Risk Non-Compliance**

## **7. CONCLUSION**

As a result of this assessment AFFCO Imlay has been given the overall compliance ratings:

- *ATH-2009010853.00 – Low Risk Non-Compliance*
- *ATH-2011014183.01 – Low Risk Non-Compliance*

A summary of the non-compliances identified for each consent is presented below:

### ATH-2009010853.00

- *Condition 1: Activities were not undertaken within accordance of consent*
- *Condition 5: Calibration inconsistencies'.*
- *Condition 13: Annual Report provided after 30 May on two occasions.*

### ATH-2011014183.01

- *Condition 1: Activities were not undertaken within accordance of consent*
- *Condition 4: Calibration inconsistencies'.*
- *Condition 8: Calibration inconsistencies'.*

If you have any queries about the attached report, please contact me via email [Oriana.vanistelrooy@horizons.govt.nz](mailto:Oriana.vanistelrooy@horizons.govt.nz) or on 021 22 77 264.

Yours sincerely

A handwritten signature in grey ink, appearing to read 'O. Van Nistelrooy', written in a cursive style.

Oriana Van Nistelrooy

**CONSENTS MONITORING OFFICER**



Table 1. Compliance Assessment Guidelines for Individual Consents

Site Compliance Grade	Explanation
Comply – Full	Complying with all conditions of consent.
Comply – At Risk	At Risk grading identified against key condition(s) of one or more of consents for the site.
Low Risk Non-Compliance	<p>Compliance with most of the relevant consent conditions.</p> <p>Non-compliance carries a low risk of adverse environmental effects or is technical in nature (e.g. failure to submit a monitoring report).</p>
Moderate Non-Compliance	Non-compliance with one or more of the relevant consent conditions, where there are some environmental consequences and/or there is a moderate risk of adverse environmental effects.
Significant Non-Compliance	Non-compliance with one or more of the relevant consent conditions, where there are significant environmental consequences and/or a high risk of adverse environmental effects.
Not Assessed	Monitoring has not been undertaken of this consent during the reporting period.

Table 2. Compliance Assessment Guidelines for Individual Conditions

Condition Compliance Grade	Explanation/Examples (not exhaustive)
Comply – Full	Conditions of consent are fully complied with.
Comply – At Risk	Compliant at time of inspection but management / system deficiencies indicate there is a real risk of a non-compliance occurring (e.g. insufficient effluent storage, poor irrigator performance).
Low Risk Non-Compliance	One-off failure to comply with a condition of consent (e.g. one off minor exceedance in key parameter in sampling.)
Moderate Non-Compliance	Four minor exceedances of key parameters for one year’s worth of sampling/data.
Significant Non-Compliance	Water quality results indicate there is a potential for or an actual effect which is more than minor that is not authorised by the resource consent.
Not Applicable	Applies to conditions that are no longer applicable. Generally relates to historic conditions that may require provision of a management plan, which has been provided and consent requires no further action.
Not Assessed	Monitoring not undertaken of consent condition.



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