



Site Inspection Compliance Report

Affco Imlay Whanganui

Consents

ATH-2007010926.01

ATH-2017201595.00

ATH-2011012104.00

ATH-2011012105.00

ATH-2011014183.01

ATH-2009010853.00

Reporting Period

2023-2024

Prepared by
Oriana Van Nistelrooy
CONSENTS MONITORING OFFICER

Reviewed by
Jeff Brown
SENIOR CONSENTS MONITORING OFFICER

Front Cover Photo
Horizons Regional Council

CONTACT 24 hr freephone 0508 800 800 help@horizons.govt.nz www.horizons.govt.nz

SERVICE CENTRES	Kairanga Cnr Rongotea and Kairanga- Bunnythorpe Roads Palmerston North	REGIONAL HOUSES	Palmerston North 11-15 Victoria Avenue	DEPOTS	Taihape Torere Road Ohotu
	Marton 19 Hammond Street		Whanganui 181 Guyton Street		Woodville 116 Vogel Street
	Taumarunui 34 Maata Street				

POSTAL ADDRESS Horizons Regional Council, Private Bag 11025, Manawatū Mail Centre,
Palmerston North 4442

F 06 9522 929

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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-2007010926.01 to discharge odour to air associated with the activities occurring at the AFFCO site, Imlay Place - Whanganui*
- *ATH-2017201595.00 to discharge contaminants to air associated with the operation of gas fired boilers located at the AFFCO site, Imlay Place – Whanganui*
- *ATH-2011012104.00 (104282) & ATH-2011012105.00 (104283) – Discharge Stormwater to the Whanganui River and Occupation of the Coastal Marine Area by Four Stormwater Outlets at the Whanganui River, 57 Balgownie Avenue, Whanganui, located at the AFFCO site.*
- *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*

A site inspection was conducted on 23 January 2025 to review physical aspects of the conditions associated with all consents held by Affco. As a result of this assessment onsite, Affco have been given an overall compliance rating of:

- *ATH-2007010926.01 & ATH-2017201595.00 (Air): **Comply - Full***
- *ATH-2011012104.00 (104282) & ATH-2011012105.00 (104283) (Stormwater): **Comply - Full***
- *ATH-2009010853.00 (Water take): **Comply - Full***
- *ATH-2011014183.01 (Water take)- **Comply- Full***

An Air Discharge report covering 1 May 2023-30 April 2024 compiles all Affco air discharge conditions and has been assessed in a separate report.

A Stormwater Discharge report covering 1 July 2022 to 30 June 2024 compiles all Affco stormwater discharge conditions has been assessed in a separate report.

A Water Take report covering 1 May 2020- 30 April 2024 compiles all Affco Water Take conditions has been assessed in a separate report.

3. BACKGROUND

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

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, and*
- *Stockyards.*

The current discharge to air resource consents (ATH-2007010926.01 and ATH-2017201595.00) were granted December 2018 and 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 September 2009 and expired in July 2019. An application to renew for 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 within Horizons.

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

There are no Horizons Regional Council Resources Consents associated with wastewater discharge as the site wastewater system discharges either directly to the Whanganui District Council wastewater system or is conveyed via the trade waste scheme to Whanganui District Council disposal facilities.

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

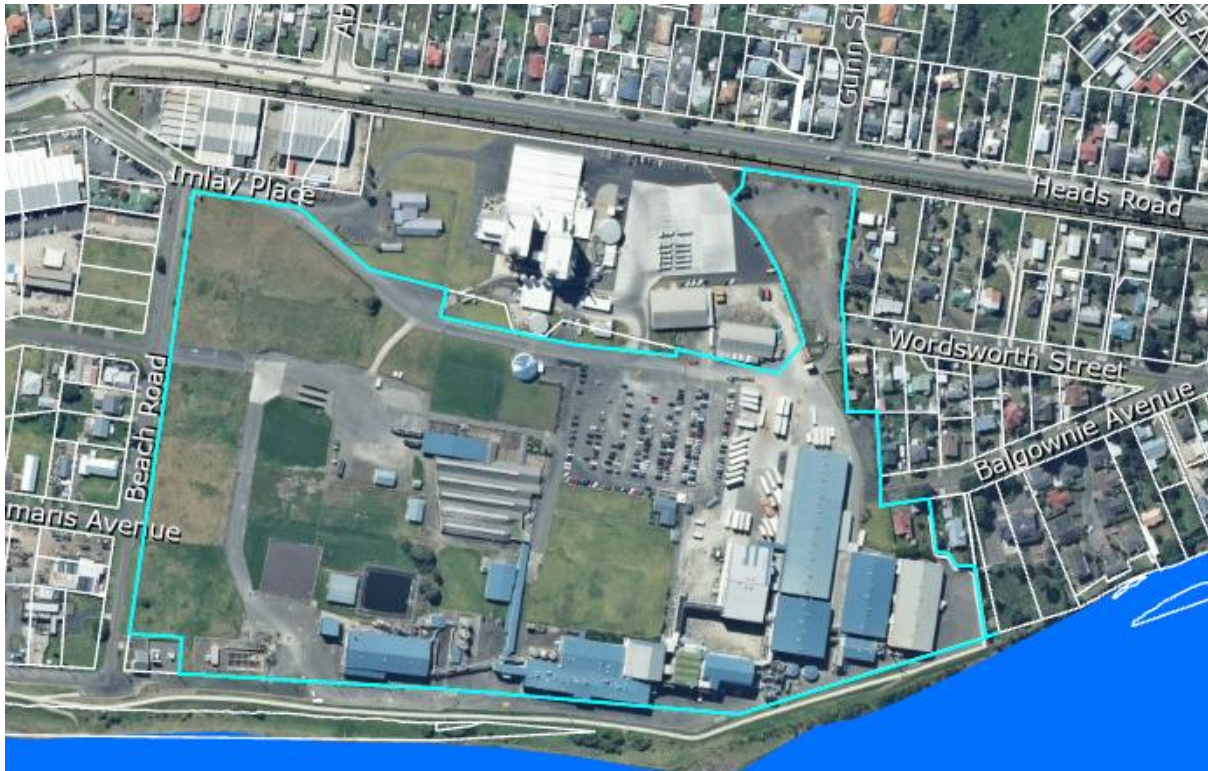


Figure 1. Overview of Affco Imlay site. Image courtesy of Local Maps, Retrieved 17 October from <https://gis.horizons.govt.nz/Viewer/?map=f82772286fb743d686a5ca4280be1ef1>

1.2. Odour

When deciding whether or not an odour is offensive or objectionable Horizons Enforcement Officers, or in this case Armourguard personnel, must undertake a FIDOL Assessment (Frequency, Intensity, Duration, Offensiveness, Location of odour event).

During a FIDOL Assessment, odour is monitored by personnel using odour complaint and assessment forms. While completing these forms, personnel record the weather conditions at the time, identify the land use affected by the odour, i.e. domestic residents, then use an interval method, noting and recording the odour intensity, hedonic tone (offensiveness) every 10 seconds for 10 minutes.

This requirement is in accordance with the Ministry for the Environment 2016 Guideline "Guide for Assessing and Monitoring Odour".

Frequency	How often an individual is exposed to the odour.
Intensity	The strength of the odour.
Duration	The length of exposure.
Offensiveness/character	The character relates to the 'hedonic tone' of the odour, which may be pleasant, neutral or unpleasant.
Location	The type of land use and nature of human activities in the vicinity of an odour source.

Figure 2. FIDOL. Image courtesy of Ministry of Environment, retrieved 7 August 2023 from <https://environment.govt.nz/assets/Publications/good-practice-guide-odour.pdf>

4. SCOPE OF THE REPORT

The scope of this report assesses onsite Affco NZ Limited (Affco) Imlay Plant's performance that can be observed during the inspection 23 January 2025 against the requirements of the following resource consents:

- *ATH-2007010926.01 to discharge odour to air associated with the activities occurring at the AFFCO site, Imlay Place - Whanganui*
- *ATH-2017201595.00 to discharge contaminants to air associated with the operation of gas fired boilers located at the AFFCO site, Imlay Place – Whanganui*
- *ATH-2011012104.00 (104282) & ATH-2011012105.00 (104283) – Discharge Stormwater to the Whanganui River and Occupation of the Coastal Marine Area by Four Stormwater Outlets at the Whanganui River, 57 Balgownie Avenue, Whanganui, located at the AFFCO site.*
- *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*

An Air Discharge report covering 1 May 2023-30 April 2024 has been assessed in a separate report.

A Stormwater Discharge report covering 1 July 2022 to 30 June 2024 has been assessed in a separate report.

A Water Take report covering 1 May 2020- 30 April 2024 has been assessed in a separate report.

5. ASSESSMENT OF CONDITIONS APPLICABLE TO ATH-2007010926.01 and ATH-2017201595.00

Only conditions that can be assessed during the inspection visit itself have been assessed below.

Resource Consent ATH-2007010926.01 – Air Discharge Permit to discharge odour to air: The discharge of odour to air associated with activities occurring at the Affco site, Imlay Place – Whanganui.

Resource Consent ATH-2017201595.00 – Air Discharge Permit to discharge contaminants to air: The discharge of contaminants to air associated with the operation of gas fired boilers located at the Affco site, Imlay Place – Whanganui.

1. *The activities authorized by this Air Discharge Permit shall be restricted to the discharge of contaminants to air, including odour, from the site. The discharges to air covered by this Air Discharge Permit are those associated with the following processes:*
 - a. *Animal slaughter;*
 - b. *By-product rendering;*
 - c. *Truck washing;*
 - d. *The primary wastewater treatment plant;*
 - e. *The holding of livestock in yards;*
 - f. *Other emission producing activities such as ventilation; and*
 - g. *The combustion of natural gas by three module steam boilers with a combined net heat output of 10.5 mw producing carbon monoxide, oxides of nitrogen and trace levels of particulate matter*

Items (a-g) above are the activities occurring at Affco in relation to the discharge to air resource consents were observed to be in accordance at the time of inspection.

Compliance Rating: Comply Full

6. *The Permit Holder shall ensure there is no discharge to air of odour, or particulate matter (including meal dust from any vent) that is objectionable to the extent that it causes an adverse effect at or beyond the boundary of the AFFCO Imlay site.*

ADVICE NOTE: When assessing compliance with this condition, an MWRC officer will consider the Frequency, Intensity, Duration, Offensiveness and Location of the odour (i.e. the FIDOL factors) in determining the adverse effect of objectionable odours.

At the time of inspection, there was no discharge of odour or particulate matter beyond the property that was causing an adverse effect.

Compliance Rating: Comply – Full

11. *The Permit Holder shall ensure that the stockyards are thoroughly cleaned of animal waste as follows:*

- a. As a minimum at the end of each day that the stockyards have been used; and*
- b. Whenever the stockyards have been used and there is more than an hour until they are used again.*

At the time of inspection, the stockyard was in use, therefore cleaning of the yard could not be observed.

Compliance Rating: No Assessed

12. *All equipment processing areas used for the receipt and processing of animal matter in the rendering operations shall be cleaned thoroughly (by way of water blasting or pressure hose) as follows:*

- a. At least one occasion every day on which processing occurs; and*
- b. At the cessation of the daily processing operation.*

These areas shall be kept free of accumulated or deposited material.

Observations of the raw bin area (receipt area), floors of the wet side area of processing were clean. Processing on the 'wet' side of the rendering process was active and therefore assessment of cleaning of the equipment could not be assessed. It was advised onsite by Mr Gowan, cleaning is undertaken daily, when processing is occurring.



Figure 1: Raw bin area, plastic on ramp, but clear of raw materials.

Compliance Rating: Comply – Full

13. All raw material **to** be processed on site must meet the following criteria:

- a. All soft offal shall be processed within six hours of kill, unless it has been stabilised by one of the following methods:
 - i. Stored material is cooled to a temperature of 20 degrees celsius or lower as soon as practicable but no later than six hours after the kill of the animal from which it is derived; or
 - ii. Stored material is treated with acid to ensure a ph of 4.5 or less; or
 - iii. any equivalent stabilisation method to (a) and (b) above which has been given technical approval by the Regulatory Manager of MWRC in which case stabilised soft offal shall be processed within **24 hours** of receipt; and
- b. hard offal shall be processed within **48 hours** of receipt.
- c. Where hard and soft offal have been mixed the material must be processed with 24 hours of receipt.

If raw material does not meet the above requirements, it must not be processed on site and contingency measures set out in the EMP must be implemented by the Permit Holder to dispose of this material in an approved off-site facility.

At the time of inspection, material containing freshly cut animals from the onsite warehouse was taken to the raw bin for rendering being well within 24 hours of being processed. Materials in the raw bin had been delivered that morning from Affco Manawatu and therefore were also being processed within 24 hours of delivery.

Compliance Rating: Comply Full

18. The Permit Holder shall operate and maintain a point source emission extraction system to extract all gaseous and vapour emissions from point sources of odour to the odour control system i.e. condensers, heat exchangers and biofilters as detailed in the Resource Consent Application and AEE dated 10 March 2017 as follows:

- a. On the wet-side of the rendering process, sources shall include the internal raw bin, pre-cooker, transfer conveyors, decanters, decanter tank, separator tank, wastewater drains and separators.*
- b. The external raw material bin, its enclosed discharge sump chamber and discharge conveyor shall be connected and air extracted to a small biofilter by **30 April 2018** and remain covered at all times apart from when open for deliveries.*
- c. On the dry side of the LTRP the sources shall include the meal dryer exhausts, meal storage bins and the filtered building ventilation air.*

Extraction rates from all enclosed point sources shall be sufficient to ensure a vacuum is maintained within the enclosure system, with a minimum vacuum of 100 Pascal gauge.

Point Extraction points to extract gaseous and vapour emissions were observed on both the 'wet' and 'dry' side of the rendering process. It is understood all points were in good working condition during the inspection.



Figure 2: Port 7 extraction testing pipe on 'wet' side of rendering process.

Compliance Rating: Comply Full

19. The Permit Holder must:

- a. visually check for any leaks of steamy odorous vapours from all enclosed process equipment and conveyors in rendering on a daily basis on days when the plant operates; and
- b. Advise the MWRC Consents Monitoring Team of any maintenance work which may result in odour release to the atmosphere at least **twelve (12) hours prior** to the works commencing; and
- c. Keep a log of the above checks details in (a) and (b).

Any remedial actions are to be undertaken in accordance with the procedures set out in the OMP required by Condition 5. Results of these checks and remedial actions shall be logged daily. Logs shall be made available to the Regulatory Manager

of MWRC or MWRC officers on request at any time. The log must also be supplied as part of the annual report required by Condition 35.

During the inspection, there were no indications of leaks or the presence of steamy, odorous vapours from the enclosed system. The system appeared to be operating as required.

Compliance Rating: Comply - Full.

20. The process operating temperatures for the rendering and drying equipment shall meet the following standards:

- a. The rendering vessels shall be operated at the lowest temperature practicable, and in any event shall not be operated above 100°C; and
- b. The meat and bone meal dryers shall be operated at the lowest temperature practicable, which is consistent with MAF (or any future replacement regulatory body with relevant functions) sterilisation requirements, and to prevent burning of meal.

The temperature of the rendering vessels and dryers shall be continuously monitored and recorded. These records shall show the correct time and date. The records shall be made available to the Regulatory Manager of MWRC or of MWRC officers on request at any time. The records must also be supplied as part of the annual report required by Condition 35.

At the time of inspection, SCADA systems showing temperatures of the rendering and drying equipment were observed as compliant during the inspection.

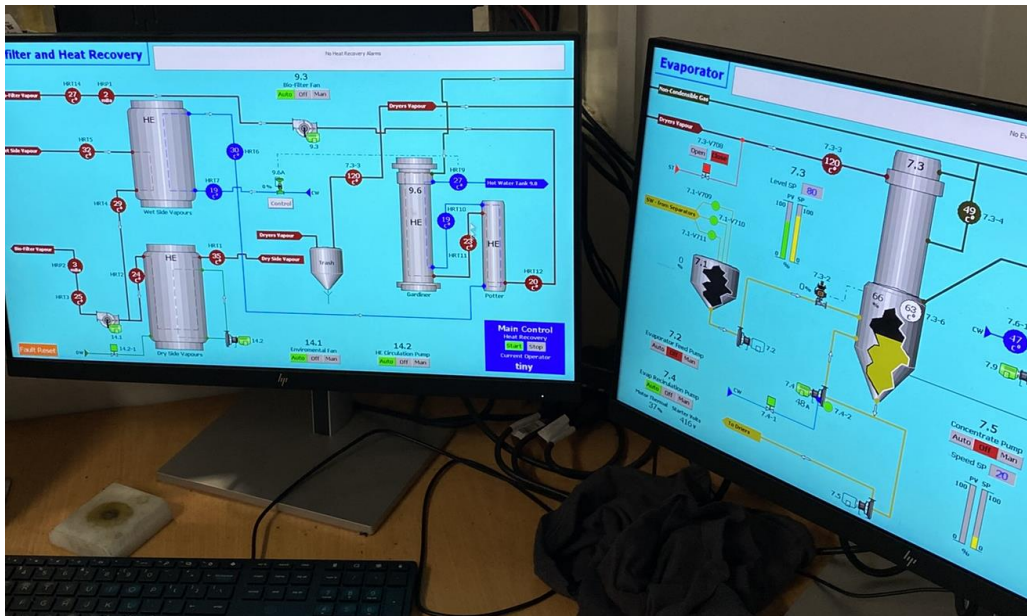


Figure 3: SCADA system showing temperatures for the rendering and drying equipment process.

Compliance Rating: Comply - Full

*30. The Permit Holder shall measure and record temperatures as specified in **Condition 15** including from the condensers associated with odour control systems and log via the rendering plant SCADA system. Electronic records of temperature versus time and data shall be made available to the Regulatory Manager of MWRC or MWRC Officers on request.*

Measure and records as specified in condition 15 are logged via the SCADA system and demonstrated to be within accordance of this condition during the inspection.

Compliance Rating: Comply – Full

Overall Compliance Rating: Comply – Full

6. ASSESSMENT OF CONDITIONS APPLICABLE TO ATH-2011012104.00 & ATH-2011012105.00

Only conditions that can be assessed during the inspection visit itself have been included in the assessment below:

2) *The activities authorised by these consents shall be restricted to:*

- a) *the discharge of stormwater from roofing and hardstand areas to the Whanganui River; and*
- b) *the occupation of the Coastal Marine Area by four stormwater Outlets in the bed of the Whanganui River.*

Such activities shall be occur at approximate map references NZMS260 T24:232-918 / NZTopo50 BM34:223-301 and in accordance with the application submitted except where otherwise required by conditions of this consent.

Activities onsite are carried out within accordance of this condition

Discharge was not occurring at the time of inspection, however, it was advised onsite that discharges of stormwater are within accordance of this condition when occurring.

Compliance Rating: Comply – Full

4) *The consent holder shall ensure that all areas that contain hazardous substances are bunded with any water collected in these areas being diverted to the wastewater system.*

During the inspection, bins containing hazardous substances were located in a bunded location, with drains in the area and outside the bunded area being diverted to the tradewaste/wastewater system. No hazardous materials were seen outside the bunded area.

Compliance Rating: Comply – Full



Figure 4: Hazardous substances within bunded area and connected to tradewaste/waste water system.

5) The consent holder shall be responsible for the continued integrity of all stormwater structures that relate to these consents and shall ensure that these stormwater structures are maintained in a structurally safe and serviceable standard at all times.

Stormwater outlets 1, 2, 3 and 4 were observed as being maintained in a structurally safe, and serviceable standard.

Compliance Rating: Comply – Full



Figure 5: Stormwater Outlet 3.

- 6) *The consent holder shall ensure that the ongoing use and maintenance of the outfall structures and occupation of the Coastal Marine Area does not result in any damage to Manawatū-Whanganui Regional Council's stopbanks or river protection works. In the unlikely event that any damage does occur, then the consent holder shall immediately notify the Manawatū-Wanganui Regional Council's Area Engineer Northern. Immediate repair is to be implemented at the consent holder's expense, and the stopbank and/or river protection works shall be returned to the same standard and condition existing prior to any damage.*

At the time of inspection, there was no obvious damage to the outfall structures, or marine areas associated with the stormwater outfalls 1, 2, 3 and 4.

Compliance Rating: Comply – Full



Figure 6: Stormwater Outlet 1

18) *The consent holder shall allow Manawatū-Whanganui Regional Council's officers or agent's access to the property at all times for the purpose of carrying out inspections, surveys, investigations, tests, measurements or taking samples related to this consent activity.*

Horizons Officers have appropriate access to the property to carry out inspections, surveys, investigations, tests, measurements or taking samples related to this consent activity.

Compliance Rating: Comply – Full

Overall Compliance Rating: Comply – Full

7. ASSESSMENT OF CONDITIONS APPLICABLE TO ATH-2009010853.00

Only conditions that can be assessed during the inspection visit itself have been included in the assessment below:

- 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.*

At the time of inspection, the location, design, implementation and operation of the abstraction was observed to be within accordance of this condition.

Compliance Rating: Comply – Full



Figure 7: Bore 2 abstraction

- 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.*

At the time of inspection, the meters viewed at the reservoir confirm this condition being met.

Compliance Rating: 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.*

Backflow prevention devices are not necessary due to the discharge pipe being elevated above the reservoir. Therefore the air gap provides the backflow prevention.

Compliance Rating: Not Applicable

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

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

Compliance Rating: Comply – Full

Overall Compliance Rating: Comply – Full

8. ASSESSMENT OF CONDITIONS APPLICABLE TO ATH-2011014183.01

Only conditions that can be assessed during the inspection visit itself have been included in the assessment below:

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.*

Water take activities onsite were seen to be within accordance of this condition.

Compliance Rating: Comply – Full

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.*

Location of abstraction was observed to be within accordance of this condition during the inspection.

Compliance Rating: Comply – Full



Figure 8: Artesian Bore

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.

At the time of inspection, straight lengths of steel pipe were observed before and after the meter.

Compliance Rating: Comply – Full



Figure 9: Artesian bore outlet located across pond.

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.*

At the time of inspection, the backflow prevention device is not required within this pump outlet due to the physical break within the pipe.

Compliance Rating: Not Applicable

- 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.*

Equipment onsite was seen in a position where it is accessible at all times.

Compliance Rating: 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.

Compliance Rating: Comply – Full

Overall Compliance Rating: Comply – Full

9. CONCLUSION

Observations onsite were compliant on 23 January 2025. As a result of this assessment Affco Imlay have been given overall compliance ratings:

- *ATH-2007010926.01 & ATH-2017201595.00 (Air): **Comply - Full***
- *ATH-2011012104.00 (104282) & ATH-2011012105.00 (104283) (Stormwater): **Comply - Full***
- *ATH-2009010853.00 (Water take): **Comply - Full***
- *ATH-2011014183.01 (Water take)- **Comply- Full***

If you have any queries about the attached report, please contact me via email Oriana.vannistelrooy@horizons.govt.nz or on 021 22 77 264

Yours sincerely



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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REGIONAL COUNCIL



horizons.govt.nz

24 hour freephone 0508 800 800

fax 06 952 2929 | email help@horizons.govt.nz

Private Bag 11025, Manawatū Mail Centre, Palmerston North 4442