

Response ID ANON-URZ4-5FJ3-D

Submitted to Fast-track approval applications
Submitted on 2024-05-03 12:59:40

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Global Contracting Solutions Limited

2 Contact person

Contact person name:
Amanda Waitere

3 What is your job title

Job title:
Legal - In House Counsel

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

203 Ellis Street, Frankton, Hamilton

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:
Amanda Waitere

Phone number:
s 9(2)(a)

Email address:
s 9(2)(a)

Job title:

Please enter your service address:

203 Ellis Street, Hamilton

Section 1: Project location

Site address or location

Add the address or describe the location:

401 Racecourse Road, Te Awamutu

File upload:

Project Paewira - Site location.docx was uploaded

Upload file here:

No file uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

1136454_Title_Search_Copy Racecourse Rd.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Christopher Graham Venn and Joanne Alice Venn

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

There is an Agreement for Sale and Purchase of Real Estate dated 26 January 2024 over the property. The landowners are supportive of the project.

Section 2: Project details

What is the project name?

Please write your answer here:

Paewira

What is the project summary?

Please write your answer here:

Global Contracting Solutions (GCS) is proposing to build and operate a Material Recycling Facility (MRF) and Energy-from-Waste (EfW) plant that will generate power from thermal processing of Refuse-Derived Fuel (RDF). RDF is a product produced by shredding, sorting and dehydrating solid waste, typically consisting of combustible components of municipal solid waste (MSW) and other waste sources.

In addition, the facility will house an education centre and visitor facility to showcase and educate community interaction with the Waste Hierarchy and how people can better engage with it. The centre is also designed to provide interaction with the region and showcase its history and Maori engagement with the land.

What are the project details?

Please write your answer here:

The recycling facility (MRF) will extract approximately 80 tonnes per day of recyclable material from 500 tonnes of mixed waste material which would otherwise be sent direct to landfill. The recycled material will include ferrous and non-ferrous items (steel, aluminum, copper, etc.) that would not normally be recovered. The waste sources include flock (recycled vehicle residues), tyres, commercial and industrial waste and municipal waste.

The proposed EfW plant will employ modern technology to convert the remaining waste material, which is unrecyclable, to energy and to recover additional resources from various waste sources. The selected technology has been developed and applied in Europe over many decades and complies with stringent European emissions rules.

The purpose of the project is to reduce the amount of waste that is being sent to landfill and increase the amount of material that is being recycled. Also, the plant will provide electricity and assist NZ with electricity security.

The objective is to collect and recycle waste and to turn waste that cannot be recycled, repurposed or reused into electricity.

The plant activities will include waste collection, waste recycling, waste processing, electricity generation and public education.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Project staging is aligned with a typical large-scale infrastructure development, i.e., concept planning, consent applications, funding, establishment, building consents, earthworks, etc. Many of the initial stages up to and including consent lodgment have been completed. These included extensive research on applicable technology and site visits to operating plants around the world. The balance of the staging falls into the high-level timeline shown below.

High-level timeline:

The following is based on consent being approved in early-2025.

1. Detailed design Mar to Dec 2025
2. Funding Apr to July 2025
3. Earthworks Oct 2025 to Jan 2026
4. Procurement Dec 2025 to Jun 2026
5. Construction Jun 2026 to Jun 2028
6. Completion mid-2028.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991- resource consent

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Waipa District Council and Waikato Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

Waipā District Council

The resource consent application is required in relation to the provisions of the Waipā District Plan.

1. Land use consent to permanently operate a large waste to energy incinerator in Waipā (LU/0323/21)
- Environment Waikato

The resource consent applications are required in relation to the Waikato Regional Plan.

Global Contracting Solutions Limited has submitted the following applications (Application Number APP143988)

2. Discharge of emissions to air associated with operating a Waste to Energy plant (143988.01.01)
3. Discharge of stormwater to surface water associated with operating a Waste to Energy plant. (143988.02.01)
4. Deposition of cleanfill associated with constructing a Waste to Energy plant. (143988.03.01)

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

The ability for the project to proceed is decided by the Applicant, Global Contracting Solutions Limited.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

The following is based on consent being approved in early-2025.

1. Detailed design Mar to Dec 2025
2. Funding Apr to July 2025
3. Earthworks Oct 2025 to Jan 2026
4. Procurement Dec 2025 to Jun 2026
5. Plant construction Jun 2026 to Jun 2028
6. Completion mid-2028.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

- Waipa District Council and Waikato Regional Council
- Waikato Tainui, Te Nehenehenui, Nga Iwi Topu o Waipa and any other group that identifies they are affected by the project e.g Apakura Runanga and Raukawa Charitable Trust
- Waikato Thoroughbred Racing - Te Awamutu Racecourse

- Fonterra Te Awamutu dairy plant
- Te Wananga o Aotearoa
- neighbouring landholders

Note: the two Council authorities have completed a public submissions process providing notice to persons or businesses they consider affected parties.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

- Waipa District Council and Waikato Regional Council - resource consent applications have been filed.
- Waikato Thoroughbred Racing - Te Awamutu Racecourse - attended a meeting to discuss the project. Submitted in public notification process.
- Fonterra, Te Awamutu dairy plant - attended three meetings with Fonterra representatives to discuss the project. Submitted in public notification process.
- Te Wananga o Aotearoa - Submitted in public notification process.
- Neighbouring landholders - notified by Council authorities as interested parties.

Note: the two Council authorities have completed a public submissions process providing notice to persons or businesses they consider affected parties.

In relation to iwi engagement see the attached Cultural Engagement Summary and Timeline.

Upload file here:

Paewira Cultural Engagement Timeline and Summary.pdf was uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not applicable

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

Te Whakakitenga o Waikato - in relation to the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010.

Te Nehenehenui - in relation to Nga Wai o Maniapoto (Waipa River) Act 2012.

Raukawa Settlement Trust - in relation to the Raukawa Claims Settlement Act 2014.

For a detailed review of how the above may apply to the location of the project see paragraphs 50 to 56 of the Advice and Recommendation of the EPA Under Section 144a RMA - Request to Call In Resource Consent Applications by Global Contracting Solutions Ltd to the Hon Penny Simmonds, Minister for the Environment dated 11 April 2024.

The site for the proposed EfW plant is on the northern bank of the Mangapiko Stream, which is a tributary of the Waipā and Waikato Rivers. Therefore, the proposal may be significant in the context of Treaty settlements and Te Ture Whaimana set out above. This is because it involves land uses and discharges of contaminants to air and water in proximity to a tributary of the Waipā and Waikato rivers.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

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Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

The expert reports included in the consent application conclude that the potential adverse effects of the activity on the environment are minor or less than minor. The reports included are as follows:

- Hail Assessment
- Hazardous Facilities Screen Procedure Assessment
- Visual Impact Assessment and subsequent Landscaping Plans
- Infrastructure Assessment Report
- Air Quality Assessment
- Acoustic Assessment
- Architectural Design Statement
- Flooding Assessment
- Economic Impact Assessment
- Greenhouse Gas Assessment
- Transportation Assessment
- Site Suitability Assessment
- Human Health Risk Assessment (HHRA)

Note: the above reports are publicly available on the WDC and WRC websites.

In relation to the Human Risk Health Assessment, the effect of the risks associated with the activity are identified as negligible, and essentially representative of zero risk.

Concerning greenhouse gas emissions, the activity will produce greenhouse gases, primarily CO₂. However, this effect should be considered in the context of the fact that the plant will reduce the volume of waste sent to landfill, offsetting significant quantities of methane emissions, improving resource recovery and provide an alternative option to coal powered electricity generation and industrial process heat.

Also, some EfW operators in Europe are currently investigating CO₂ capturing technology (CCS), with a small number of trials underway. If successful, this technology will considerably improve the GHG outcomes for the EfW when it becomes available. The developers are monitoring this progress and investigating other possible mitigation measures such as district heating schemes, vertical farming, etc.

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Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

Applicable National Policy Statements and Environmental Standards:

1. National Environmental Standard for Air Quality.
2. Aotearoa NZ Waste Strategy.

3. NZ Emissions Reduction Plan.

Project Paewira complies with all environmental standards and policy statements. In some cases, it will make a significant contribution.

With respect to the NES for Air Quality, all of the emissions from Paewira fall well below the allowable limits.

All of the literature, actions and Government policy on waste management, including the NZ Waste Strategy, are focused on the top-half of the Waste Hierarchy. That is, the attention and actions are focused on the "Reduce, Reuse, Recycle" elements. While we applaud and support these actions, there are no actions focused on the lower stages of the hierarchy. There are few if any focused on maximising the "extraction of materials or energy".

The waste section of The Emissions Reduction Plan recently released by the NZ Government is 95% focused on reduction of organic methane from landfills. This aids further in the opportunity to maximise material extraction. Unfortunately, the Plan also has very little discussion on the balance of waste, the inorganic material, and how it proposes to handle this. There is a clear objective on the separation at source being a key initiative in achieving a focus on organic material, and we are encouraged this is now part of waste policy for Council's to implement. There is an expectation in the Reduction Plan that Council's will then need to invest in "materials recovery facilities" (MRF), either at transfer stations or otherwise, to assist with this with Council budgets already stretched. The Emissions Plan then acknowledges that private investment will likely be required (as does the Council WMMP).

While Paewira does have a net positive carbon dioxide emissions profile, it will offset significant methane emissions from landfill. Paewira's principals' are exploring several options for reducing the carbon emissions impact such as displacement of Fonterra wood pellet incinerator with a steam and power supply, a local district heating scheme, carbon capture and storage, and greenhouse/vertical farming.

Further, it will displace 150,000 tonnes of material from being deposited in the ground, a conversation on the continued use of landfills NZ is yet to have despite many of our trading partners banning the use of landfills in the early 2000's.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

We filed our resource consent applications on 1 December 2021. On 17 December 2023, the Waikato Regional Council advised us that they were going to request the Minister for the Environment to "Call In" our consent application to either a board of inquiry or the Environment Court. Two years after our Applications were filed. This late decision by the WRC has caused a considerable delay with the resource consent application process for our project.

We hope that the proposed "Fast Track" Act will provide a more efficient process for determining our resource consent application, e.g., that upon referral to an expert panel. they will have six months to review our project and recommend any relevant consent and/or permit conditions.

Public Submissions have already been completed. The proposed fast track process could remove an additional 3 to 4 months of further public submissions. If the project is "Called In" by the Minister for the Environment progress with obtaining a resource consent could be delayed by a further public notification process. In addition, the "Call In" process is not subject to any statutory time frames so there is uncertainty about how long that process may take.

Currently there is a significant amount of uncertainty concerning the timeframes for the determination of our resource consent application.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

Paewira is an excellent candidate for the efficient operation of the fast-track process as the expert reports concerning the potential effects of the project have already been prepared. Also, the public submission process has already been undertaken. Therefore, there should be no delay with providing the necessary information to the Exprt Panel required for them to be able to make a decision.

Has the project been identified as a priority project in a:

Sector plan or strategy

Please explain your answer here:

The Aotearoa New Zealand Waste Strategy identifies energy from waste plants as a viable option for contributing to New Zealand's waste management.

Due to the request by the Waikato Regional Council (supported by the Waipa District Council) to the Minister for the Environment to "Call In" the consent applications for the Paewira project, the EPA provided advice under Section 144a of the RMA to the Minister in a letter dated 11 April 2024. That letters states that the Paewira project can be considered to be a proposal of national significance.

Will the project deliver regionally or nationally significant infrastructure?

Regional significant infrastructure

Please explain your answer here:

The EPA has advised that Project Paewira is a proposal of national significance. The project will deliver a regionally significant infrastructure. This being due to its contribution to waste management and the generation of electricity within the greater Waikato region.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

Paewira will contribute to a well-functioning urban environment by providing the following:

- electricity
- improvement in circular use of resources in the community
- transport efficiency from reducing transportation of waste
- competition improvements from having an additional competitor in the waste management market
- opportunity benefits from reduced need to use land for landfill
- tourism activity associated with the education and information centre at the proposed plant

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

There is a report written by Formative dated 30 November 2021 that assesses the Economic benefits of Paewira. The report is part of the resource consent. The report notes the following:

- the proposed WtE plant will generate a range of economic benefits for the local and regional economy. Most significant will be the activity during the construction and operation of the plant itself. There will also be benefits to the wider economy via improved waste handling efficiency and power generation.
- The construction of the proposed plant will generate \$14.1 million in GDP in the local Waipa economy, equivalent to over 140 jobs. The regional economy would receive economic activity of \$75.7 million GDP and a total of 760 jobs. This economic activity will be spread over the three-year planning and construction phase.
- The operation of the proposed WtE plant will generate \$18.9 million in GDP to the local Waipa economy, which would be equivalent to over 210 jobs or 1% of the employment in the district. The regional economy would receive economic activity of \$37.6 million GDP and a total of 420 jobs. This economic activity will occur in every year of operation, starting in 2028. (Note the report was written prior to the extended consent application evaluation process).

Will the project support primary industries, including aquaculture?

No

Please explain your answer here:

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

While not directly involved in extraction and refining processes, Project Paewira will recover significant amounts of material for recycling that would otherwise dictate continued extractive processes to the detriment of the environment in particular metal. These materials would otherwise have been directed to landfill and lost.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

In respect of New Zealand's climate goals and evolving policy direction through the Climate Change Commission's 'Ināia tonu nei: a low emissions future for Aotearoa' report, the proposed plant provides an alternative option, particularly at the local level, in the transition towards a lower carbon future. This is through reducing the volume of waste sent to landfill, diversion of the production of methane, improving resource recovery and providing an alternative option to coal powered electricity generation and industrial process heat.

More broadly, some WtE operators in Europe are currently investigating CO2 capturing technology (CCS), with a small number of trials underway. If successful, this technology will considerably

improve the GHG outcomes for the WtE plant if this technology can be retrofitted to the plant once it becomes available.

Will the project support adaptation, resilience, and recovery from natural hazards?

No

Please explain your answer here:

Will the project address significant environmental issues?

Yes

Please explain your answer here:

New Zealand has significant issues concerning waste management, increasing waste volumes and its use of landfills that pollute the environment. New Zealand also has issues relating to the remediation of contaminated landfills. Paewira proposes a technological solution to these issues. EfW can process waste and divert it from landfill and produce electricity. Material from remediated landfill can also be processed, with recyclable material being recovered and the balance waste being diverted from landfill and processed in the EfW plant.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The land is zoned for industrial development albiet with a special dairy overlay to be considered. It largely complies with all vehicle, acoustic, water, wastewater and other district plan rules. It does exceed the maximum building height allowable however visual impact assessments combined with landscape integration planning mitigate any potentially adverse effects.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

The construction and building envelope is designed to cope with natural, physical and operational hazards.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

Nil

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:
Craig Tuhoro

Important notes