



Community submission guide on the incinerator proposal

Submission Workshop Dates:

Te Awamutu Bridge Club 888 Te Rahu Road	WDC Carpark Market
Tuesday 26 th November 5 – 7pm	Saturday 7 th December 9am – 12pm
Tuesday 3 rd December 5 – 7pm	Saturday 14 th December 9am – 12pm

Submission Form:

- Online submission form is available here <https://submissions.epa.govt.nz/consultations/gcsl-waste-to-energy-plant-application-84c42b33-1bec-49a7-ab3f-d733df9bda67/make-a-submission>
- Submissions are due by 5pm on **Wednesday, 18 December 2024**

Some points to raise in your submission

We recommend that you add your own reasons/story to your submission, and focus on the things that are most important/relevant to you. There is no special length or level of detail required for your submission.

Introduce yourself

You may like to introduce yourself – who you are, where you live, if you represent a bigger group: your family/whānau, hapu, business, not-for-profit organisation, a community group, etc, how long you have lived in the area, why you live in the area, your connection to the community or the issue.

- If you are directly impacted by this proposal you should say so.

Points you may want to include

A. Untested technology

- At present Aotearoa New Zealand has no municipal solid waste (MSW) incinerators. The incinerators that were in operation around 2000 have all closed. Many of them were a significant source of dioxin contamination
- A similar, larger, proposal for a waste-to-energy incinerator in Waimate, South Canterbury has been “called in” by the Minister for the Environment in part because this is new technology with national implications.
- Te Awamutu does not want to be a testing ground for this technology
- Global Contracting Solutions does not have any experience of operation in waste incineration. It is a scrap metal business. The company does, however, have a track record of violating resource consent conditions in their Hamilton operations.

B. Cultural Impact

- The application contains no formal Cultural Impact Assessment
- Fully informed consent from Iwi and Hapū must be part of this proposal including clear disclosure of human health and environmental impacts
- Taiea te Taiao was created to promote an ecological corridor to link Maungatautari and Pirongia te aroaro o Kahu. This corridor will reconnect these maunga/mountains with biodiversity plantings which will enhance native species present, transform iwi connections to the Mangapiko stream, and ultimately improve water quality. An

incinerator will undermine these efforts.

C. Air, Water and Land Pollution & Emissions

- The incinerator will produce dioxins that are cancer-causing even in extremely low levels. These will be emitted into the air, and will settle on the land and in the water. There is no safe level of dioxins, and these “bio-accumulate” - meaning that over time they build up in human fat tissue and in animals.
- There is no assessment of land contamination included in the application. International research shows that the land surrounding incinerators can be extensively contaminated with heavy metals, microplastics and other toxic emissions including dioxin.
- Stormwater from the site will be discharged into the Mangapiko Stream. This water is likely to be contaminated with heavy metals and dioxin. Filtration systems and settlement ponds do not eliminate all of the toxic products meaning these will make their way into the waterways
- One of the emissions from burning tyres/tyre derived fuel is zinc oxide which has not been modelled and which is highly toxic to aquatic life.
- The huge earthworks over several years will impact the health and wellbeing of the Mangapiko River

D. Inappropriate land use

- The site is totally unsuitable for a large scale waste incinerator. The current “Specialised Dairy Industrial Area” designation means that the land use is intended to ensure that any activity there was aligned with Fonterra’s activities.
- It is not appropriate to have an incinerator burning millions of tyres next to a milk production facility
- This area is not identified as an area for industrial development in the District Plan. Two areas are identified for industrial growth: at Bond Road and Paterangi Road.
- The location of a heavy industrial operation immediately next to existing and planned residential housing, schools and food businesses, and operating 24-hrs/day, 7day/week is not appropriate and conflicts with the intentions of the *Waipā District Plan* and *Growth Strategy* for the community.
- The very large size of the building and stacks does not fit in with the area. It will dominate, have a significant impact on the landscape and turn the entire area into the feel of an industrial zone.

E. Flooding

- Entire site is a floodplain - most of the site is designated a High Risk Flood Zone
- The river has been straightened and narrowed over time to enable development, this is now considered one of the major causes of flooding. Allowing rivers the ability to spread to accommodate severe rainfall events in future protects infrastructure, business and housing from inundation.
- The new incinerator buildings would increase flooding spread to the Fonterra factory and houses on Factory Road, numbers 331-467
- The company wants to build its building lower than existing requirements (because it will cost them a lot more money to build to the required levels). This will mean even greater risk to the community.
- Insurance companies are warning New Zealanders not to build on floodplains due to climate change. The incinerator may become uninsurable, and the community left with the clean up bill.

F. Climate change

- The incinerator will use non-renewable feedstock (plastic waste, tyres, mixed solid waste & flock) to create energy: this is equivalent to a fossil fuel production plant, but much dirtier and riskier because of the different composition of the materials.
- The addition of non-renewable energy from waste works against efforts to decarbonise the energy sector.
- The incinerator will be a massive contributor to climate change. It will directly add about 150 kilo tons per year of CO₂.
- The facility would have a carbon footprint many times greater than the same amount of waste being sent to landfill

G. Hazards, Risks, Toxic Ash and other toxic byproducts

- The incinerator would produce 23 tonnes/day of toxic ash which **has to be landfilled**. Incinerator ash contains heavy metals, microplastics and dioxins.
- The storage of highly contaminated wastewater and other hazardous substances on site risks spills and wider contamination.
- There is no risk assessment of the possibility of fire or explosion despite the storage of hazardous materials and highly flammable feedstock. The community only has a volunteer fire brigade.

H. Feedstock, Waipā waste minimisation, zero waste alternatives:

- Te Awamutu will need to import almost all of the material for this facility from outside of the district. This is not a proposal for the benefit of the community.
- The company has no contracts for the delivery of the feedstock except from its own operations (as Global Metal Solutions). This means it is impossible to know what hazards, risks and emissions exist because only a small percentage of the feedstock is known. It also means that the company is more likely to burn recyclable materials and other things because it must always continue to operate. It will directly work against efforts to minimise waste.
- The inclusion of 35,058 tonnes of plastic (as well as a considerable portion of MSW that includes plastic) does not align with the recently released National Plastics Action Plan for Aotearoa New Zealand by the Ministry for the Environment
- Incineration does not replace the need for landfills - instead it takes ordinary materials and concentrates them into more toxic ash.
- The Waipā District Council has a great waste minimisation plan and opportunities for more comprehensive zero waste strategies that would fit with the goals of minimise wastes, while meeting community aspirations for a healthy environment, job creation and mitigation of climate emissions.
- Investing hundreds of millions of dollars into an incinerator locks in the need for continued production of waste, meaning the community misses out on other waste uses further up the waste hierarchy (like reuse, repair and repurposing).

I. Human Health

- There is no human health assessment of this proposal
- The incineration plant is a hazardous facility with serious risks of harm to human health. The plant will emit cancer-causing dioxins and furans, sulphur dioxide, nitrogen oxide, mercury and particulate matter will be released into the air.
- Dioxins damage the human immune system and cause cancer. Studies have shown direct links to non-Hodgkins lymphoma, increases in risks of miscarriages and pre-term delivery of babies. There are links to reduced male fertility. Exposure to particulate matter impacts those with respiratory problems such as asthma, cardiovascular issues, the elderly and children.
- In the Netherlands, research conducted indicated that the high dioxin output from waste incinerators could be responsible for contamination of cow's milk and meat. As a result, the production and sales of dairy products from was prohibited for several years.

- In 2016, human-made (anthropogenic) air pollution in New Zealand resulted in an estimated 3,317 premature deaths (in people aged 30+ years). The largest causes were NO₂ and PM_{2.5}. There were 32 premature deaths due to air pollution (PM_{2.5} and NO₂) in Waipā District (among people aged 30+ years) in 2016. The incinerator will significantly add to these pollutants, and therefore, contribute to the premature death of Waipā residents.
- Under NZ's air quality standards, it is illegal to burn even one tyre because the health and environmental effects are so toxic - yet, this project is proposing to burn 35,000 tonnes a year. Burning tyres emits cyanide, carbon monoxide, sulfur dioxide, and products of butadiene and styrene. And the smell of those tyres burning will fill the community with an unbelievable stench.
- The odour and dust have not been adequately assessed. There is no indication of how often the start up/maintenance will be done and levels exceeded.
- There will be significant additional traffic in a residential area, adding to air pollution and impacting those who are old, very young and immunocompromised. It will change the nature of the community from a quiet residential street to an unsafe and busy thoroughfare of trucks at all hours of the day and night.

Once you've sent your submission - please encourage friends and family to submit!