

Before Independent Commissioners appointed by the West Coast Regional Council

In the matter of the Resource Management Act 1991 (**the Act**)

And

In the matter of an application for resource consent under sections 88 and 127 of the Act

And

In the matter of Discharge to land consent (RC-2024-0122) and variation of resource consent (RC2021-0097-V10) to enable the exercise of the discharge consent where that could lead to the discharge of contaminants off-site at Taylorville Resource Park, Taylorville.

Summary of evidence of Ellen Taylor for Taylorville Resource Park Limited

Dated: 3 September 2025

Andrew Schulte (andrew.schulte@cavell.co.nz)
Counsel for applicant

CavellLeitch >
LIMITED

Level 3, BNZ Centre
111 Cashel Mall
PO Box 799, Christchurch
T: +64 3 379 9940 F: +64 3 379 2408

Summary of Ellen Taylor

1. I prepared a brief of evidence in writing dated 19 August 2025 and my evidence can be summarised as follows.
2. We operate our activities and the site in accordance with resource consents we sought and received from the West Coast Regional Council (**WCRC**).
3. At no point have we sought to circumvent what we understood were the conditions of those consents, seeking several variations to ensure that our activities were acceptable to the WCRC.
4. But despite some apparent and documented shortcomings or failures, we consider that the site has been maintained in a workmanlike condition and any issues of compliance have been quickly addressed. We are not aware of any significant off-site adverse effects from the activities on site and water.
5. However, we recognise that there are concerns that there could be off-site adverse effects, particularly in relation to the GDC water treatment plant and bores. We do not take those concerns lightly and have proceeded on the premise that our activities cannot and will not affect water that comes from that plant.
6. Our efforts to ensure that this is the case – that we do not have an impact – are ongoing and will continue under this and any subsequent consent. We understand that we have an obligation in this regard.
7. However, we continue to believe:
 - 7.1. The advice we have received: that the discharge that is applied for will not have adverse effects off-site;
 - 7.2. The variation sought does not change the nature of our operation;
 - 7.3. The discharge application is sought to provide the margin of safety we need to prevent the storage ponds from potentially breaching;
 - 7.4. The focus here needs to be on the temporary resource consent sought. Longer term considerations are being assessed and will be provided for as part of TRPLs long-term comprehensive application for the site; and
 - 7.5. The comprehensive application will be publicly notified and issues raised objecting to this application, that we consider irrelevant in the current context, will be considered then.

Comments on other evidence received

8. In relation to the evidence provided by Mr Perrin-Smith for the GDC, I would make the following comments:
 - 8.1. Regarding paragraph 48: We have kept records of all loads of waste that is accepted on site. These records have been and continue to be provided to WCRC.
 - 8.2. Regarding paragraph 53: our dealings with the EPA in response to the abatement notice included discussions of whether the option of discharge to land should be considered. As I note in my evidence a further variation to that end was considered, but superseded by this application (and the comprehensive consent). The alternatives the GDC refers to are either not practicable (trucking the leachate) or able to provide sufficient capacity in the near term to address the capacity issue.
 - 8.3. In the meantime, TRPL's advice is that the GDC drinking water supply is not put at risk by this discharge, and that consent conditions can be imposed to ensure this is the case.
 - 8.4. This last point is relevant to those aspects of Mr Perrin-Smiths evidence about the possible implications of contamination of the drinking water supply. We have seen no actual evidence that supports the contentions regarding connections between our site and the water supply abstraction bores. We are, however, aware of contaminants found in water testing upgradient of our site. If such a connection did exist, wouldn't that have already been seen in the water supply testing?
 - 8.5. Finally we have made significant investments in this site and continue to do so. We are fully committed to operating the site safely & responsibly both now and in the future. It may never be possible to say that there are no risks to the GDC water supply, some of which will have nothing to do with our site. But on the information we've seen and the advice given by our experts, the risk here seems very low. That is not to say that we have ignored the risk or will not take steps to reduce it further, as the monitoring plans show, but we do really need this temporary consent and will put in place appropriate measures so that impacts on the GDC water supply do not eventuate.

Dated: 3 September 2025



Ellen Taylor