BEFORE INDEPENDENT HEARING COMMISSIONERS
AT GREYMOUTH

I MUA NGĀ KAIKŌMIHANA WAHAKAWĀ MOTUHAKE
KI MĀWHERA

	RC-2024-0122
UNDER	The Resource Management Act 1991
IN THE MATTER OF	Application for discharge permits and application for variation of consent conditions.
APPLICANT	**TAYLORVILLE RESOURCE PARK LIMITED**

SUMMARY OF EVIDENCE STATEMENT OF KURTIS RYAN PERRIN-SMITH

Dated 4 September 2025

Presented by:
Corcoran French
74 Armagh Street, Christchurch Central 8013
PO Box 13001, Christchurch 8141

Telephone: (03) 379 4660
Email: geraldine@cflaw.co.nz
jonathon@cflaw.co.nz
Solicitors: Geraldine Biggs &
Jonathon Sylvester

SUMMARY OF EVIDENCE STATEMENT OF KURTIS RYAN PERRIN-SMITH

Introduction and Role

1. Thank you for the opportunity to address this hearing today, on behalf of the Grey District Council.

2. My name is Kurtis Perrin-Smith and I am the Group Manager Operations at Grey District Council. I have worked at the Grey District Council for over 20 years and have held responsibilities including the management of Council's drinking water supplies.

3. For clarification, where I use the term 'Council' in my summary, it is with reference to the Grey District Council.

4. Council's position is clear: we oppose the variation application to discharge treated leachate from Taylorville Resource Park Ltd (TRP) because it represents risk to Council's Greater Greymouth Water Supply. If contamination of the extraction bores was seen, it would represent a serious risk to public health and significantly compromise Council's ability to provide a critical potable water supply to the Greater Greymouth community.

5. I will take it that Council's submission and my evidence has been read by the Commissioners and provide the following summary.

Greater Greymouth Water Supply

6. The Greater Greymouth drinking water supply is significant infrastructure for the district and is deemed a lifeline under the Civil Defence Emergency Management Act 2007. It is the sole source of drinking water for around 10,000 people across the Greater Greymouth area, including the hospital, schools, rest homes, and businesses.

7. The supply comes from three shallow groundwater bores located in a gravel beach beside the Grey River, with a fourth bore currently being commissioned. All four bores are consented. Once water is extracted from the bores, the treatment process includes Ultra Violet disinfection, chlorination, and pH correction via lime dosing. While this treats for bacteria and protozoa, it does not treat contaminants such as heavy metals, PFAS, hydrocarbons, nitrogen compounds, or volatile organics.

8. The drinking water system represents a very significant financial investment for our community. The current replacement cost is currently being reviewed but is likely to be in excess of $20 million. Council is currently working towards the installation of a filtration system to assist with removal of chlorine byproduct production, with an estimated value of $8.5 million in the 2025/26 and 2026/27 financial years.

Drinking Water Safety Plan

9. Council has a Drinking Water Safety Plan for its Greater Greymouth Water Supply, which includes a Source Water Risk Management Plan. The most recent version of this document is dated August 2024 and has previously been submitted to the Drinking Water Authority, Taumata Arowai.

10. The Source Water Risk Management Plan identifies in detail the potential risks associated with the TRP site, which sits in the catchment immediately north of the extraction bores. It recommends that further work is required by technical experts to understand;

    (a) Geology of the area, including geological cross sections of the area between TRP and the extractions bores.

    (b) Identification of geological and hydrological features including flow paths.

    (c) With outcomes to provide recommendations on;

        i. Monitoring well locations, following determination of the risk.

        ii. Any mitigation measures considered necessary to remove risks posed by TRP, to the water supply source water.

11. The Drinking Water Safety Plan and the Source Water Risk Management Plan are currently under review by Council as significant new information has become available since the August 2024 document. Council is in discussion with Taumata Arowai, on this matter.

Risk from the TRP Operation

12. The TRP operational site is about 400 metres from the extraction bores and located uphill, which means there is a direct risk of contaminants migrating into the source water and water supply.

13. Independent hydrogeological experts have confirmed there are potential pathways for leachate contamination, including through groundwater, surface water, and fractured mudstone.

14. If contamination reached the extraction bores, the supply would be compromised very quickly. Council main Omoto treated water reservoir holds operational storage of 6–10 hours, with some other minor reservoirs holding up to 24 hours storage volumes. This storage will also be dependent on the filling cycle of a reservoir at the time of any event (storage can be less).

15. There is no immediate alternative source water supply for the entire Greater Greymouth Water Supply.

16. If a contamination event was to occur from TRP, Council would need to understand if the contamination had occurred from surface water or ground water. Council would need to isolate the extraction bores, issue urgent notices to the community and urgently seek alternative water sources. Realistically, this would not be achievable within the limited timeframe available, when consideration is given to maintaining a supply. Major treatment plant upgrades would likely be required, at a cost of many millions, to ensure the removal of specific contaminates, testing and commissioning, before normal water supply could be returned to the Greater Greymouth Water Supply consumers.

17. While Council's submission focused on the Greater Greymouth Water Supply extraction bores, the Runanga Water Supply extraction bores are located 1.7km away, on Sids Road. Council is working to bring these bores online at present and notes that they are consented. These extraction bores form part of the Greater Greymouth Water Supply Drinking Water Safety Plan, as part emergency supply. These existing bores are evidence within Engeo's Preliminary Hydrological Assessment dated September 2024.

Monitoring and Compliance

18. Given the limited information about groundwater flows, monitoring is unlikely to be a complete solution. The installing additional wells for monitoring would not guarantee early detection as laboratory testing and results of testing, does takes days, meaning by the time results become available, contamination could have already entered the water supply.

19. To date, the applicant has a poor compliance history, with discharges being recorded on several occasions, with abatement notices from both WCRC and the EPA.

20. Council considers the explicit prevention of contamination of surface water and groundwater under existing condition 11, to be an important safeguard for the environment and protection of the Greater Greymouth Water Supply extraction bores.

Alternatives and Conditions

21. The EPA has already directed alternatives, including constructing additional lined storage and/or removing leachate to authorised offsite facilities. It is believed that further investigation into alternate solutions should be further explored as the proposed discharge to land, where contaminants could enter the environment via surface water or ground water, could threaten the drinking water, source water.

22. If consent were considered appropriate by the Commissioners, despite Council's opposition, Council would require very strict conditions.

23. These would include, but not be limited to, an independent technical review of draft discharge management plan, an approval process involving Council, WCRC, Iwi and Taumata Arowai, accredited laboratory sampling, testing and monitoring, and bonds to cover all risks associated with potential contamination from the site. The bond would further need to be scaled to provide for all costs associated with any contamination event, including alternate temporary water supply and treatment upgrades.

24. The scale of a bond has not been considered at this point, but when considering the likely conditions to avoid all effects on the drinking water supply, the bond level will likely to be in the millions. Determination of the bond scale can only be determined once the risk is fully understood, and likely treatment processes are known.

25. Council would further need strict guarantees that contaminants could not reach extraction bores and that the TRP operations would not place Council in a position where it could not meet the requirements of the Water Services Act 2021 or the Drinking Water Quality Assurance Rule. Furthermore, that required monitoring as deemed necessary by Council technical advisors and Taumata Arowai, would not result in additional costs to the Greater Greymouth Water Supply consumers.

Conclusion

26. In conclusion, the Council sees the risk to public health, source water security, Council's ability to maintain a potable drinking water supply, meeting the requirements of the Water Service Act 2021 and likely financial burden on consumers, as unacceptable.

27. A contamination event would have catastrophic impacts on the Greater Greymouth Water Supply, significant costs would be seen to resolve any issue and Council would likely face liability under the Water Services Act 2021.

28. For these reasons, Council strongly opposes the variation application.

29. Thank you and I am happy to take any questions from Commissioner's.

Dated 4 September 2025

_____

Kurtis Ryan Perrin-Smith