

Shane Samuel Wiramū Lang and Kim McPherson

Owner of [REDACTED]

Email: [REDACTED]

Phone: [REDACTED]

RE: **Proposal:**

von Ah Contracting Limited seeks resource consents for the establishment and operation of a **composting facility** at 1047 Kaniere-Kowhitirangi Road, Kokatahi RD 1, Hokitika 7881.

Consent No	Consent Type	Activity / Location
RC-2024-0136-01	Discharge to land	To discharge contaminants to land associated with the composting operation.
RC-2024-0136-02	Discharge to land	To discharge compost leachate to land where contaminants may enter water.
RC-2024-0136-03	Discharge to air	To discharge contaminants (including dust and odour) to air from the composting facility.

We wish to be heard in support of our submission.

If you wish to be heard, and others make a similar submission would you consider making a joint case with them at any hearing

Yes

If you indicated you wish to be heard, you will be sent a copy of the S.42A Officer's Report and a copy of the Decision once it is released. Please indicate below which format you would like to receive these documents in:

Electronic (CD) copy

we have served a copy of my/our submission on the Applicant as per Section 96(6)(b) of the RMA

Yes – emailed to Nicky von Ah

We **oppose** this application for the following reasons:

Location

The location that von Ah Contracting Ltd is proposing to construct an open composting system is within 200m from my property where my grandchildren happily play in their back yard. It is also located, in my opinion, too close to the township of Kokatahi ①where there are approximately 26 dwellings, a school with a three classroom capacity, a church, a local pub and accommodation providers.

There would be increased truck movements on the roads to and from Kokatahi, with trucks turning 125m from the main intersection at Kokatahi which would increase the dust levels during dry periods. This is also a high tourist traffic area throughout the tourism season.

The property and proposed facility borders on a waterway – Duck Creek.

Von Ah compost Management Plan 29/08/25 document

I refer to the above document and outline the following issues and questions relating to the proposal:

- Pg 6 section 4.1 (2) and in section 4.2 It is stated that a “ratio of at least 1:1 to ensure a suitable carbon-to-nitrogen ratio is achieved.”.
I have home composted for the last 25 years and have learned through experience, research and practical courses that a compost will not be successful with a 1:1 ratio as is proposed.

The correct ratio for a compost to work efficiently as is proposed would require the ratio to be : *“The ideal C/N ratio for composting is generally considered to be around 30:1, or 30 parts carbon for each part nitrogen by weight. Why 30:1? At lower ratios, nitrogen will be supplied in excess and will be lost as ammonia gas, causing undesirable odours. Higher ratios mean that there is not sufficient nitrogen for optimal growth of the microbial populations, so the compost will remain relatively cool and degradation will proceed at a slow rate.”* ②

My questions then would be

- How would von Ah Contracting source sufficient carbon matter to ensure that a ratio of 30:1 could be achieved to ensure that the compost system would work as stated in the proposal?
- Could consent conditions be set to require a correct ration of 30:1?
- Pg 6 section 4.1 (4) How does von Ah Contracting propose to reach an optimal temperature for composting in open air during the winter periods where this area is well known for frosts?
- Pg 6 section 4.1 (6) “removal of rubbish contamination and gross solids”. Where is this matter going?
- What is the plan if the proposed temperatures cannot be reached?
- Pg 8 Section 4.3 paragraph 2 – states “It [the composting pad] has been constructed”. I thought this application was to build a composting system? It appears through the wording throughout the documents that the facility has already been established. I therefore have concerns as to whether the ground work layers have been constructed in accordance with the plans and were these checked by WCRC?
- Section 4.3 paragraph 3 – the leachate collection sump. What is the plastic liner being used? Is it tested to withstand its purpose? Researching liner systems there are key

elements which need to be checked. The welding together of the liner to ensure that no leakage is possible. The type of materials used as there are numerous liners for different types of conditions. The strength of the material used to withstand heavy machinery driving over the pads. If the pad is already in place – has this been checked to ensure the liner will meet the requirements? This also goes for the liner(s) used in the composting windrow areas.

- Page 9 first paragraph. A wetland will be used to mitigate the runoff entering waterways. What is the size of the wetland? Is there evidence to show that the size of the wetland can hold the volumes of water going through it to local waterways? I have been unable to find research for compost facilities using wetlands to mitigate runoff in NZ, the only one was a pilot programme in Isfahan ③, which required a complex wetland system to be set up for this type of run off.
- Page 9 Section 4.4 – what is the water supply that will be used during dry periods to keep the windrows of compost at the correct moisture levels?
- Page 9 section 4.4 – “Irrigation application rate is controlled to make sure each discharge event does not result in an application of greater than 20mm in depth”. If the ground is already saturated due to heavy rain fall, how will the depth be measured?
- Copy of email responses – 2ECM_336628_V1
Page 6 - It is stated that the compost area would be covered (in high rainfall events), yet this does not appear anywhere in the Management Plans for Processes.
Through experience, I know that an uncovered compost system will not work in an area with high rainfall. Too much water in the compost system, along with insufficient carbon matter will reduce the amount of oxygen present. This will cause an imbalance and the compost system to fail causing odour issues.
- I had noted that von Ah Contracting had said the use of insecticides would be used for controlling unwanted insects. If you are using an insecticide on a compost system you will kill off the micro-organisms that you ultimately require for the compost system to be successful; therefore this would require very careful management.

In summary: The overall plan raises more questions than it has answers. I am unsure of the experience of von Ah Contracting in regards to composting on an industrial scale and there appears to be no mentoring from an experienced operation that could assist with any issues that will arise especially in the first few years. There are so many contradictions between the ‘Management Plan’ and the ‘Proposal’ that I am unsure what they are actually going to do.

With these contradictions throughout these documents it has left me in a quandary of the proposed activity being done in accordance with their own rules or policies, let alone any conditions put in place by the Regional council / consent process.

Odour Assessment

The Mote Report May 5th 2025 in its introduction noted 'animal carcasses' as being a waste material that would be entering the compost system. There was no mention of this in the Plan or Proposal. This raises massive concerns in regards to the potential for an increase in vermin, flies and other pathogens let alone the stench in warm weather.

I note a report from the Public Health Communication Centre on 2nd October 2025 the effects that odour has on human health ④. The distribution of odour assessed by the Mote Report encompasses 870m zone which includes the Kokatahi township, school, accommodation providers and a church.

In the "Good Practice Guide for Assessing and Managing Odour" – a publication from the Ministry of Environment ⑦, pg 19 and 20 Table 4 – the following ratings are given: Schools – High; Tourist, cultural and conservation – high; rural residential – moderate to high. Given these ratings and the Mote report assessing the distribution of odour this should be enough grounds to decline this application for this location.

I quote from the Public Health communication Centre report on 2/10/25:

"The most common sources of the foul odours were meat processing related (33%)" there are meat by products in the list of matter going into the proposed compost facility.

"Summary (from the above report)

Historically, foul odours were believed to cause illness and efforts to reduce their impact influenced urban design and public health laws. Research over the last 50 years has re-established odour pollution as causing adverse health effects as well as affecting community mental health.

Such incidents are common in Aotearoa New Zealand (NZ); a search of news media identified 36 examples of communities in NZ experiencing significant odour problems between 2016 and 2025. In a case study from 2014, 13 people had symptoms severe enough to seek medical attention due to foul odours from a wastewater treatment plant.

Even though regional councils are the lead agency for managing odour under the Resource Management Act 1991, public health services have a role in advocating on behalf of communities affected by odour pollution."

This proposal is suggesting putting a composting facility at the fringe of the Kokatahi township. The Mote Report shows an odour effect range of 870m which encompasses the township. I would not like to see Kokatahi as being one of the incidences as having health issues. Rural living is meant to be about keeping people in good health due to the fresh air, clean water and a good community spirit.

The odour may or may not carry any toxic matter, however the psychological impact on a person's well being has shown to have an impact. ⑤ As has happened with the Compost plant located in Bromley Christchurch. This facility is now in the process of being shut down, however residents are saying that it is going to take 3 to 5 years to do so and this is too long. People within a 1km radius of this facility have had health issues.

An article titled "Air quality review indicates link between compost site odour and illness" reported in May 2021 *"An independent review of air quality at a controversial composting and*

worm farming business in Taranaki has found there is most likely a relationship between illness in the community and odours emitting from the Uruti site.” ©

Looking into air borne pathogens from compost facilities a review completed by Nathalie Wéry © said *“The main identified risks of infection from composting bioaerosols are represented by opportunistic micro-organisms, especially molds which can take advantage of deterioration in the immune system”*, she also noted that: *“More research is needed on analyzing the emission and dispersal of bioaerosols emitted by composting facilities in order to better implement regulations by determining acceptable levels of bioaerosols and defining buffer zones between compost sites and nearby residential areas”*. As yet it appears that science is unsure of the direct effects of compost air borne pathogens on human health. As a grandparent I am concerned that my grandchildren would be playing within 200m from the composting site and do not wish my grandchildren to be succumbed to illnesses of any sort from air borne pathogens.

I am also concerned that any air borne pathogens could sit on the roof or in the spouting of the home where rainwater is collected and used within the home, again potentially causing health effects.

Water Quality

Duck Creek is known for its spring fed clear water and is a location where fishermen will go to catch trout. This waterway feeds into the Kokatahi River which goes into the Hokitika River.

I was involved a number of years ago with the Whitebait Connection and we took a group of school children and assessed the health of the waterway. Although surrounded by dairy farms the health was good. There were good signs of aquatic life and the children got to experience what a healthy waterway looked like. Like other spring creeks in the area, Duck creek has pathogen issues occasionally and is currently on a D band in the LAWA website©. Harris Creek which in the WCRC’s own reports as some of the worst in the region(currently E band), this is believed to be from overland flows in high rainfall events taking pathogens from nearby land into the waterway. I have serious concerns that this may occur here due to the lack of evidence that the wetland can manage the potential pathogen loads from the leachate as well as the risks of leachate being spread on farmland before high rainfall events.

Although the proposed operation is downstream from the school it still has the potential for leachate either directly or indirectly through the ground water to have an effect on this waterway and the waterways it leads into, being the Kokatahi and Hokitika Rivers. I note that on the WCRC’s consent mapping website the Kokatahi has a consent for a bore to provide potable water to the school (AUTH-RC01217-1). I find that the risk of leachate entering the groundwater to be far too high due to the proximity of the processing site and the far too thin and unwelded liner that the facility has proposed to use/may have already installed.

Air Quality

The proposal states that they will plant out trees on the bunds to mitigate odour coming from the compost site. The application contains no evidence that this suitable to keep the effects of the odour to an allowable level. I understand that from recent issues on the West Coast Landfills that compliance and monitoring of odour related issues have been hard to quantify leading to wellbeing issues in the local community. This brings me back to my previous point

about locating facilities in appropriate locations; as once odour issues occur which they will inevitably occur, the impacts on the community have already been felt.

We seek the following decision from the Local Authority:(give precise details)

I would like the Regional Council to **decline** this application based on the inconsistencies within the documents provided; the proximity to a settlement which includes a school, accommodation providers and pub; as well as the unknown potential health (physical and mental) impacts on those that live nearby, for me that is my son and his young family. There is also evidence within New Zealand of the impacts of composting facilities near where people are residing.

I commend von Ah Contracting to take the initiative to remedy a local waste issue; however, for this proposal to come to life I would like to see a more appropriate location be sort that would not be near a settlement, school, church, accommodation providers or local pub.

References

1. Pg 26 of the Westland District Council District Plan maps - <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.westlanddc.govt.nz/sites/default/files/district-plan-maps.pdf>
2. <https://compost.css.cornell.edu/chemistry.html>
3. Ecological Engineering - Volume 105, August 2017, Pages 7-14 Ecological Engineering
Compost leachate treatment by a pilot-scale subsurface horizontal flow constructed wetland :
<https://www.sciencedirect.com/science/article/abs/pii/S0925857417302422#:~:text=M%20nitrogen%2C%20organics%2C%20solids%2C,from%20industrial%20wastewaters%20in%20Bangladesh.>
4. <https://www.phcc.org.nz/briefing/more-just-bad-smell-odour-pollution-and-health-aotearoa-new-zealand>
5. <https://www.rnz.co.nz/national/programmes/morningreport/audio/2018891319/christchurch-compost-plant-stench-makes-residents-sick>
6. <https://www.rnz.co.nz/news/national/443383/air-quality-review-indicates-link-between-compost-site-odour-and-illness>
7. Good Practice Guide for Assessing and Managing Odour (2016) – Ministry for the Environment ISBN: 978-0-908339-74-7 Publication number: ME 1278
8. Bioaerosols from composting facilities—a review by Nathalie Wéry
<https://pmc.ncbi.nlm.nih.gov/articles/PMC3983499/>
9. <https://www.lawa.org.nz/explore-data/west-coast-region/river-quality/hokitika-river/harris-ck-mulvaney-rd>