

Submission to hearing re Composting at Kokatahi from Dr George Tripe (retired GP) and resident of Kokatahi Village.

In principle I support the concept of composting - the re-use of waste materials rather than simply putting them into landfill or similar. Many of the Kokatahi residents are here because of the pristine environment and I believe that we must do all we can to maintain this environment. The proposed composting facility risks compromising the environment and should not be allowed to proceed where it is proposed.

The potentially negative effects of composting are contamination of the environment - be they odour, dust, noise, attraction of pests, contamination of waterways or general compromise of the quality of the life of plants, of people/residents and children and staff at the local primary school.

There are issues in the application put forward by von Ah Contracting some of which are frankly incorrect and others misleading. Some of these potentially affect the environment and so the safety of those exposed to the outcome of the composting process.

One dubious argument is about the direction of the prevailing wind. In Paul Baynham's Motu report for the WCRC it is described as west/south-westerly. In his composting proposal under wind (para 2.3.2) the applicant suggests the wind is "*predominantly light easterly/north easterly.*" As one who lives in the area and sees which way our trees are growing, I would confirm that the prevailing wind is west/south-westerly. We occasionally get strong easterly winds - those can be very destructive blowing trees over. There has recently been a report from a wind recorder station in Mantell St. as noted in Donovan van Kekam's report - this finds the wind as predominantly west, south-westerly.

It is proposed to have a bund around the yard where the composting is to be done with trees planted in/on the bund to contain any odour or dust - this seems unrealistic and Andrew Thompson's submission provides evidence to support the unreality of this restricting the spread of dust and odour. In addition to the non-acceptance of trees preventing drift of odour and dust is the fact that trees are not there and won't be there and of significant size and in significant numbers for a number of years i.e. even if they were to be effective in containing odour and dust that would not be the case for a number of years and the composting process should not be consented in the interim.

In an earlier submission it was proposed that cattle carcasses be composted - that appears to have been dropped even though it is referred to in the later Motu report. In the S42A report there is reference to an email of 20th May 2025 from Paul Baynham in which the odour risk zone set at 870 metres in his report of 5th May 2025 is reduced by 100 metres. This all suggests that the idea of including carcasses has been dropped but the intent remains to include DAF sludge from the abattoir - it is noted in Composting Proposal and AEE (para 3.2.2.6) will likely contain "*...fine Dead solids material, including fats and oils from meat processing and waste-water systems treatment.*" Animal products such as blood and bits of tissue, in addition to the paunch grass all coming from Silver Fern Farms could ultimately contaminate pastures against the recommendation of the Ministry for Primary Industries that ruminant animals should not be grazed on pasture which has had animal carcass waste (such as would be in the leachate) spread on it.

It had been stated that coal ash was to be included in the composting process - it is not described as being an ingredient in the Sect.42A proposal. It does mention elsewhere in the Sect 42a report that Karbon King would be used to assist in getting the carbon: nitrogen ratio right. It would seem that 'Karbon King' is another name for coal ash. It is not described in detail in the documents, but one part of coal ash is 'fly ash' which apparently contains a high level of toxic chemicals. In the S42a document there is a report of discussion with Dr Joe Wilding about the risks of toxins in the fly ash. It is unclear if coal ash, and the associated fly ash, are to be fed into the composting process and I think we should presume that it may be added at a later date unless specifically prohibited. The odour/dust from fly ash includes the toxins that cause harm to human health. It is mentioned in the S43 report that the harmful chemicals can be limited by separating the fly ash from the coal ash - but no mention is made of requiring this be done. Further, the report suggests that such material left to drift with the dust can contaminate water supplies - many people in the village (including the school) collect water off their roofs for general household use including drinking - filtering such water is not going to remove traces of toxic elements/chemicals.

The detailed monitoring of the composting process while it is in the windrows would seem very difficult to achieve in an open yard - daily temperature recordings along with pH, oxygen levels and moisture content. The concern is that if these strict conditions are not met and maintained the composting process will not proceed as intended and there is more likely to be bad odour, particularly when windrows are being turned, and increased negative consequences on the health of people in the community which will likely only be identified when the harm has been done.

It is, I believe, unrealistic to expect somebody to reliably check these things (temperature, moisture content and pH daily), particularly during variable and stormy weather. - I think particularly of the heavy rain in October 2025 (see attached) when there would also be pressure on those managing the composting facility to manage the run off and the weekly emptying of the leachate from the pond! This is where a large wetland would be helpful in filtering the heavy run off and escaping leachate - something that is totally unrealistic to try to achieve at the proposed site of this composting facility. The reports provided by the soil expert (Trevor Webb) and the nearby resident (Andrew Thompson) support the unreality of the proposal. It is worth noting that during a flood in the early 1950's the house that Marty von Ah now occupies on the site of the proposed composting facility was flooded. We have seen increasing unexpected floods in the last couple of years, including last week - when is the West Coast (and the proposed composting site) going to get its next major flood??

I could go on; having grown up on a sheep farm I have experienced the vagaries of the weather and the difficulty of realistically managing processes such as those proposed in this composting process on the doorstep of the village of Kokatahi.

It would I believe, be irresponsible of the Regional Council to consent to the development of this composting facility by von Ah contracting where it is proposed - any such facility should be away from centre of population with a large wetland to soak up and filter out toxic chemicals so that they do not get into waterways.

There are some other matters of concern about the politics of possibly granting a consent for this composting process. Within the odour zone of the facility is the Kokatahi/Kowhitirangi primary school with about 40 pupils. Not only are the pupils and staff at risk from odour drifting over and through the school and their playground but also of dust collecting on the roof and

being drained into the water supply - including their drinking water. I was in touch with the Ministry of Health who told me that they leave matters such as the healthy environment about a school to the discretion of whatever local authority the school is in. On the internet amongst letters from the Minister of health is one from Simeon Brown to Prof Lester Levy dated 27 November 2025 stating “ *I also expect you to focus on core responsibility.....and avoid advocacy roles. This includes refraining from making submissions on local government policies or proposed developments*”. I understand that the same sort of direction has been issued to Department of Education staff. I firmly believe that this Council has a responsibility to do what it can to protect the health and wellbeing of school children in its region. This is particularly so when it is recognised that children are more at risk than older people and the negative effects of toxins are often not identified until after considerable exposure - the effects of asbestosis being an example of such damage being discovered well after the exposure occurred. The Council has a responsibility to protect the health and safety of children schooled in its region.

I contacted an experienced scientist asking if he knew of any composting facilities that had not engendered public opposition and attempts to close them down - the only ones he knew of in Australasia were isolated well away from people. I have also heard of composting experts who have been surprised that anybody is trying to establish a composting facility on the West Coast of the South Island of NZ because of the high rainfall and the difficulties that would pose to providing a pollution free open-air process.

I repeat that I am not opposed to composting in principle - only where it is close to where people live and also where there is not a large wetland to filter the leachate and run off and from the yard in which the composting is done. Without a good filtering system (like a large wetland) leachate and runoff in wet weather is going to get into waterways and contaminate groundwater.

Added to the issues around consenting are various local political issues:

Von Ah Contracting Ltd (VAC) is an agricultural contracting service that many local farmers rely on to provide service for them - such as harvesting their bailage and they would not want to antagonise the contractor they rely on.

There is evidence of VAC collecting piles of coal ash on their property in the past without Council Consent. This does not augur well for their reliability in following Council requirements, many of which are a bit vague, in the composting process. The S42a report takes the proposals as valid at face value - such as a planted bund preventing odour and dust drift. Should Council grant the consent for the composting they could be considered to be colluding with VAC and supporting Siver Fern Farms in allowing a dubious activity.

This proposed composting facility should not be allowed to be developed where it is proposed.

George Tripe

19 February 2026 .