

Thank you for the opportunity to comment on the proposed new guidelines, and the discussion of these at the Queenstown workshop.

In our view, the update is useful, although not particularly significant, as it is fairly similar to the 2003 guidelines and grades of product are nearly identical.

For Invercargill this still results in 1A grade product (Aa Biosolids in 2003 guidelines) not being economically viable, which will mean that we will look at opportunities where we control the whole process from production of product to incorporation into land, and then verification that soil limits are not exceeded before another use is allowed. Generally this will mean Council owns the land, and uses it as a dedicated application site, until soil contaminant rates are close to maximum. This has been our management practice for nearly ten years, with end use of land being passive reserve-native planting regenerating into forest with walking/ cycle/ horse riding trails)

The inclusion of agricultural organics in the same guidelines, and needing to meet the same standards, is positive as this reduces the stigma that has applied to biosolids.

Answers to the specific questions?

1/ "A rose by any other name". Whatever we call it, people will know it is shit. I don't think the name will make a significant difference, but if one is needed, possibly "Byproduct" could be considered

2/ Whatever system is used will need to be explained, so not sure that this is important. My preference is to remain with the current Aa etc.

3/ The biggest issue with these contaminants is that the limit is sometimes very close to the testing sensitivity, so it can be difficult to meet limits if several contaminants are tested separately, but combined in a limit. For emerging contaminants, it may be preferable to test occasionally or at representative sites across the country, so that there is a clear indication of when these may become an issue of concern.

4/ I have no problems with format etc.

5/ The technical aspects are achievable, but methodologies not necessarily applicable to all systems. These tend to be required to be adhered to rigidly by Regional Council consents, and consents can be hard to get. It would be useful to highlight as an overriding principle that stabilisation/ contaminants limits at the end use (eg when incorporated into soil) need to be met, rather than strict adherence to specified methods.

6/ I think it will be business as usual for us

7/ I would expect Regional/ District Plans to adopt guidelines as a means of compliance when issuing consents for Organic products Application to Land

8/ Don't know enough about this aspect to comment.



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