

FORM 6

**FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, SUBMISSION ON PUBLICLY NOTIFIED PROPOSED POLICY STATEMENT OR PLAN, CHANGE OR VARIATION**

Clause 8 of Schedule 1, Resource Management Act 1991

To: Otago Regional Council, Private Bag 1954, Dunedin 9054

**Name: Public Health South**

**Address:** Private Bag 1921, DUNEDIN 9054

*(Note: different address for service below)*

1. This is a further submission in support of, or in opposition to, submissions on the Otago Regional Council Omnibus Plan Change (Waste Plan Change 1)
2. Public Health South is a party with an interest in the proposal that is greater than the interest of the general public. Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South. Southern DHB delivers health services to a population of 335,990 and has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. It seeks to promote equity and to reduce adverse social and environmental effects on the wellbeing of people and communities. They aim to create or advocate for healthy social, physical and cultural environments. Public Health South's original submission on the Otago Regional Council Omnibus Plan Change (Waste Plan Change 1) sets out the reasons for their position on these proposed plan changes.
3. The original submissions that Public Health South either supports or opposes are described, and the reasons for support or opposition are detailed in the table attached as **Annexure A** to this further submission.
4. Public Health South seeks that the relief set out in **Annexure A**, in terms of allowing or disallowing original submissions, be granted.
5. Public Health South **does** wish to be heard in support of this further submission. If others make a similar submission, Public Health South will not consider presenting a joint case with them at a hearing.

29 September 2020



Tom Scott, Public Health South  
Address for Service: Public Health South  
Private Bag 1921  
Dunedin 9054

**Note to person making further submission**

A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.



Provision	Submitter	The details of the submission that PHS supports or opposes	Relief Sought by Submitter	Public Health South's Position and Reasons	Relief Sought
Rule 6.4.10	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga	The prevention of waste oil being used as a dust suppressant on roads	Support for provisions as notified	Support for provisions in part. We recommend the final sentence of the explanation be strengthened to read: With safer alternatives now more readily available, waste oil must not be applied as a dust suppressant	Amend the final sentence of the explanation
Rule 6.6.2	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga	Discharge of dust suppressants	Support for provisions as notified	Support for provision as notified. Public Health South supports the application of non-hazardous dust suppressants to rural roads given that road dust is a recognised respiratory hazard.	Retain as notified
Policy 7.4.11	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga	Policy 7.4 as it relates to landfill policy	Support for provisions as notified	Public Health South supports chapter 7.4 in its entirety including the suggested amendments as outlined in 7.4.11	Retain as notified
Chapter 6	Dunedin City Council	6.4.10 6.6.2	Amend by providing a 1-year transition period to cease using waste oil as a dust suppressant	Public Health South opposes this suggested amendment. The public health hazards of using used oil as a dust suppressant on Otago's roads have been articulated in Chapter 6. There is no need for this practice to continue.	Reject submission

Rule 6.4.10	Te Rūnanga o Ngāi Tahu	The prevention of waste oil being used as a dust suppressant on roads	Support for provisions as notified	Support for provisions in part. We recommend the final sentence of the explanation be strengthened to read: With safer alternatives now more readily available, waste oil must not be applied as a dust suppressant	Amend the final sentence of the explanation
Rule 6.6.2	Te Rūnanga o Ngāi Tahu	Discharge of dust suppressants	Support for provisions as notified	Support for provision as notified. Public Health South supports the application of non-hazardous dust suppressants to rural roads given that road dust is a recognised respiratory hazard	Retain as notified
Policy 7.4.11	Ngāi Tahu ki Murihiku (Te Ao Marama	Policy 7.4 as it relates to landfill policy	Support for provisions as notified	Public Health South supports chapter 7.4 in its entirety including the suggested amendments as outlined in 7.4.11	Retain as notified
Rule 6.4.10	Ngāi Tahu ki Murihiku (Te Ao Marama	The prevention of waste oil being used as a dust suppressant on roads	Support for provisions as notified	Support for provisions in part. We recommend the final sentence of the explanation be strengthened to read: With safer alternatives now more readily available, waste oil must not be applied as a dust suppressant	Amend the final sentence of the explanation
Rule 6.6.2	Ngāi Tahu ki Murihiku (Te Ao Marama	Discharge of dust suppressants	Support for provisions as notified	Support for provision as notified. Public Health South supports the application of non-hazardous dust suppressants to rural roads given that road dust is a recognised respiratory hazard	Retain as notified
Policy 7.4.11	Ngāi Tahu ki Murihiku (Te Ao Marama	Policy 7.4 as it relates to landfill policy	Support for provisions as notified	Public Health South supports chapter 7.4 in its entirety including the suggested amendments as outlined in 7.4.11	Retain as notified

Policy 6.4.10	Federated Farmers of New Zealand – Otago and North Otago provinces	Policy 6.4.10 as it relates to the prevention of waste oil being used as a dust suppressant on roads	Support for provisions as notified	Support for provisions in part. We recommend the final sentence of the explanation be strengthened to read: With safer alternatives now more readily available, waste oil must not be applied as a dust suppressant	Amend the final sentence of the explanation.
Rule 6.4.10	The Department of Conservation	Policy 6.4.10 as it relates to the prevention of waste oil being used as a dust suppressant on roads	Support for provisions as notified	Support for provisions in part. We recommend the final sentence of the explanation be strengthened to read: With safer alternatives now more readily available, waste oil must not be applied as a dust suppressant	Amend the final sentence of the explanation.
Rule 6.6.2	The Department of Conservation	Discharge of dust suppressants	Support for provisions as notified	Support for provision as notified. Public Health South supports the application of non-hazardous dust suppressants to rural roads given that road dust is a recognised respiratory hazard	Retain as notified
Landfill Methods 7.5 and Landfill Rules 7.6	The Department of Conservation	Objective 7.3 Landfill Objectives	Support for provisions as notified	Support for provision as notified. Public Health South supports objectives aimed at avoiding, remedying or mitigating the adverse environmental effects arising from discharges of contaminants at and from landfills	Retain all provision of Chapter 7 as notified