



FURTHER SUBMISSIONS ON PROPOSED PLAN CHANGE 13 (Air Quality) to the Bay of Plenty Regional Natural Resources Plan Clause 8 of First Schedule, Resource Management Act 1991

To:
The Chief Executive
Bay of Plenty Regional Council
Whakatane 3158

Email: air@bopr.govt.nz

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Further Submitter Details

Full name of submitter: ***Mercury NZ Limited ("Mercury")***
Contact name: *Fraser Graafhuis*
Address for service: *PO Box 445
HAMILTON 3240*
Contact phone number: *(07) 858 8406*
Email: fraser.graafhuis@mercury.co.nz

Further Submissions

Mercury is a person who has an interest in the proposal that is greater than the interest of the public generally. Mercury made submissions on the Proposed Plan Change 13 to the Bay of Plenty Regional Natural Resources Plan. Mercury owns and operates the Kawerau geothermal power station and which includes developments and activities located in Bay of Plenty region. Mercury is a key stakeholder in the Bay of Plenty particularly with respect to any matters that impact or potentially affect Infrastructure or renewable electricity generation activities.

Mercury makes the further submissions as set out in the following table.

Mercury **wishes to be heard** in support of its further submissions.

If others make a similar submission, Mercury will **not** consider presenting a joint case with them at the hearing.

Fraser Graafhuis
Planning and Policy Advisor
for Mercury NZ Limited

Submitter number	Submitter name	Section reference	Support/ Oppose	Reasons for Mercury's Further Submission	Decision Requested Allow/Disallow
45 - 24	Fonterra Ltd	AQ-0X	Support in Part	Mercury supports the intent of the submission, which is to enable uses reliant upon discharges, which provide significant economic and social benefits to the region and New Zealand. Mercury would like to discuss whether including the text "appropriately remedied or mitigated" reads like a policy rather than an objective. Mercury supports having appropriate policy tests within policies and assessment criteria.	Allow
21 - 3	Jodie Bruning	New Objective	Oppose	Mercury seeks that assessment decisions are based on established regulation such as National Environmental Standards, and consideration be given to guidance from relevant authorities. Mercury supports and would expect that World Health Organisation (WHO) recommendations and research are considered as relevant context or support for plan provisions and for new consent applications. Mercury considers Objective 1 adequately covers the need to protect human health, so does not support the proposed new objective.	Disallow
21 - 1	Jodie Bruning	Objective AQ03	Oppose	Mercury considers the proposed wording for Objective AQ 03 is written like a policy not an objective. Mercury seeks to retain the existing objective wording, which deals with emissions in an effects based manner. Some adverse effects where minor, do not require to be remedied or mitigated, as effects may be tolerable and with safe limits.	Disallow
21 - 4	Jodie Bruning	New Objective AQ05	Support in Part	Mercury supports the encouragement of best practice and better monitoring to achieve better environmental outcomes, including emerging organic contaminants (EOC's). Mercury supports the intent to safe guard water, soil and ecosystems for future generations and for the implementation of mechanisms through the appropriate regional and district plans. Some discussion is needed as to the extent EOC's pathway to the environment is through emissions to air.	Allow in Part



37 - 1	Oji Fibre Solution	New Objective	Oppose in Part	Clarification is sought as to how the relief sought implements the intent of the submission to enable regionally significant industry. Mercury supports any policy enabler of emissions from E11 Infrastructure (including geothermal electricity generation and development). Consideration of which activities are strategically important to the region needs to be guided by the RPS, and national policy, which needs to be given effect to. If there is going to be a prescriptive list of regionally significant activities, Mercury advocates geothermal electricity generation needs to be included.	Oppose in part
37 - 18	Oji Fibre Solution	New Objective	Support in Part	Mercury supports consideration of the functional and operational requirements of strategically important activities, however considers the correct tests need to be applied. Mercury considers such a policy approach needs to firstly consider which activities are strategically important to the region, and be guided by the RPS, and national policy statements, which need to be given effect to. The extent to which the operational requirements of activities, which is largely investment related, and a relevant matter under s104 which must be had regard to, but not necessarily recognised and provided for. Functional requirements apply where an activity has to be located in a specific location that cannot be changed, such as locating a geothermal power station above a geothermal field, and is an example of an activity that should be recognised and provided for.	Allow in Part.
45 - 4	Fonterra Ltd	New Objective	Support in Part	Mercury supports any enabler of emissions from Infrastructure (including geothermal electricity generation and development). Consideration of what activities are strategically important to the region need to be guided by the RPS, and national policy statements, which need to be given effect to. If there is going to be a prescriptive list of activities, geothermal electricity generation needs to be included.	Allow
58 - 12	Horticulture NZ	New Objective	Support in Part	Mercury supports the use of best practice, and policy enablers for Infrastructure (including geothermal electricity generation and development). Consideration of what activities are strategically important to the region needs to be guided by the RPS, and national policy statements, which need to be given effect to. If there is going to be a prescriptive list of activities, geothermal electricity generation needs to be included.	Allow



76 - 3	Federated Farmers	New Objective	Support in Part	Mercury supports the intent of the submission, but clarification is required as to how zoning is a relevant matter for an effects based assessment or environmental bottom line for an air discharge. Mercury generally considers the reverse sensitivity issue is valid and would support a general objective relating to reverse sensitivity. Zoning is a district plan matter and it is unclear how it relates to a regional plan.	Support in Part
33 - 1	Ballance Agri-nutrients Ltd	Objective 1	Oppose in Part	Mercury supports the intent of the submission to provide clarity as to what constitutes degraded ambient air quality. However, Mercury opposes the relief sought, specifically the text " <u>such that it does not meet national air quality requirements</u> ". Consideration of whether an emitter can enhance air quality in a practical or bespoke manner is relevant. Hydrogen Sulphide emissions from the ground are naturally occurring within the region and exceed recommended levels. It would be cost prohibitive for Mercury to remove Hydrogen Sulphide from emissions associated with the operation and development of geothermal power stations if ambient levels are not appropriately recognised.	Oppose in Part
50 - 5	Ravensdown	Objective 1	Support	Mercury supports and agrees with the logic presented, specifically that there are tools such as the Air Quality NES and relevant guidelines, which determine whether air quality is degraded or not.	Allow
58 - 8	Horticulture NZ	Objective 1	Support in Part	Mercury supports deletion of the word 'protect'. However, the phrase " <i>are not adversely affected</i> " could be interpreted to mean that any adverse effect needs to be managed. Contaminants with a linear effect on human health can have a small effect and be well within health guidelines, which would not require management from the emitter.	Allow in part
76 - 1	Federated Farmers of NZ	Objective 1	Support in Part	Mercury supports the relief sought. Mercury does not support a new objective specific to the protection and restoration of the mauri of air.	Support in Part
50 - 6	Ravensdown Ltd	Objective 2	Support	Mercury support the relief sought.	Support
67 - 3	Port of Tauranga	Objective 2	Oppose in Part	Mercury supports the intent of the submission, however does not agree with deleting relevant standards and guidelines.	Oppose in part
7 - 2	Western Bay of Plenty District Council	Objective 3	Oppose	Mercury opposes an objective using the word protect, which could be interpreted as preclusive of use. Manage allows for an effects based approach to be taken.	Disallow
19 - 3	Z Energy	Objective 3	Support	Mercury supports this minor amendment	Allow



21 -1	Jodie Bruning	Objective 3	Oppose	Objective reads like a policy. Mercury prefers the existing wording which is suitable for managing discharges and effects from discharges on the environment. Mercury does not agree with the advocated statutory purpose of the RMA , which is not primarily to protect, but promote sustainable management, through management of use, development and protection. Mercury will support a objective which represents the correct RMA tests in a Balance d manner.	Disallow
33 - 3	Ballance Agri-Nutrients Ltd	Objective 3	Support	Mercury supports the intent of the submission that effects on localised receptors is relevant to specific air discharges and the intent of this objective.	Allow
58 - 3	Horticulture NZ	Objective 3	Support	Mercury supports this minor change.	Allow
76 - 2	Federated Farmers of NZ	Objective 3	Oppose in Part	Mercury supports the intent of the submission to ensure reverse sensitivity effects from sensitive activities establishing with the rural zone are minimised. There are also different levels of expected amenity, which is indicative of proximity to sensitive uses. However, Mercury considers deleting amenity from the objective would not be appropriate as effects from air discharges such as odour and dust are a relevant matters to be considered in an air discharge assessment.	Disallow
58 - 13	Horticulture NZ	Policy 1	Support	Mercury supports a rule framework which provides for some discharges as a Restricted Discretionary activity, where effects can be appropriately managed.	Allow
21 - 5	Jodie Bruning	Policy 2	Oppose	Mercury supports the intent of the submission to ensure effects from horticulture sprays are managed. However, hazardous substance regulation is managed through alternative regulatory mechanisms, such as the Health and Safety Act. Does the relief sought need to target specific emissions from relevant land uses, rather than set general requirements that is potentially relevant to all air discharges?	Disallow
30 - 3	Trustpower Ltd	Policy 2	Support in part	Mercury supports the proposed submission and the tests applied but advocates the objective needs to be targeted to specific landuses. This is so it will not constrain geothermal electricity generation activities.	Allow in part
37 - 6	Oji Fibre Solution	Policy 2	Support	Mercury supports the deletion of Policy 2. Mercury seeks to ensure new policies required for targeted land uses do not unnecessarily constrain emissions from geothermal electricity generation.	Allow
58 - 14	Horticulture NZ	Policy 2	Oppose	Hazardous substance regulation is managed through alternative regulatory mechanisms, such as the Health and Safety Act. The wording proposed by Horticulture NZ is an improvement on the notified version. Does this policy need to be targeted to specific land uses which land contamination from such air discharges is relevant?	Disallow



67 - 6	Port of Tauranga	Policy 2	Support in Part	If the policy is not going to be deleted, the wording proposed is an improvement from the notified version. Hazardous substance regulation is managed through alternative regulatory mechanisms, such as the Health and Safety Act. Does this policy need to be targeted to specific land uses to which land contamination from air discharges is relevant?	Allow in Part
76 - 7	Federated Farmers	Policy 2	Support	Mercury supports the relief sought to delete the policy and the rational for the submission.	Allow
26 - 6	Rotorua District Council	Policy 3	Oppose in Part	Mercury supports the intent of the submission, however it is unclear what relief is sought and what the policy impact will be on emitters. Mercury seeks Policy 3 implement the correct tests inline with the RMA, which currently includes effects on human health, which is protected by an assessment against national environmental standards and air quality guidelines.	Disallow
26 - 7	Rotorua District Council	Policy 3	Oppose in Part	Mercury supports the intent of the submission, however it is unclear what relief is sought and what the policy impact will be on emitters. Mercury seeks Policy 3 implements the correct tests in line with the RMA, which includes effects on human health, which is protected by an assessment against national environmental standards and air quality guidelines.	Disallow
33 - 6	Ballance Agri-Nutrients Ltd	Policy 4	Support	Mercury supports the intent of the submission and the relief sought.	Support
13 - 2	Gray Southon	Policy 3	Oppose in Part	It is unclear what relief is sought or implications for individual emissions. Greenhouse emissions would be covered by effects on the environment, which is included within policy 3 (a)	Disallow
48 - 2	Lawter NZ Ltd	Policy 3	Oppose in Part	It is unclear what relief is sought or implications for individual emissions, as some clause are ands, other could be ors.	Disallow
19 - 6	Z Energy Ltd	Policy 3	Support	Mercury supports this minor amendment. Mercury seeks Policy 3 implement the correct tests in line with the RMA.	Allow
30 - 4	Trustpower	Policy 3	Support	Mercury supports this minor amendment. Mercury seeks Policy 3 implement the correct tests in line with the RMA.	Allow
37 - 7	Oji Fibre Solution	Policy 3	Support	Mercury would support amendments where tests are in line with the relevant tests within the RMA.	Support in Part
45 - 7	Fonterra Ltd	Policy 3	Support	Mercury supports this amendment. Mercury seeks Policy 3 implement the correct tests in line with the RMA.	Allow
50 - 9	Ravensdown Ltd	Policy 3	Support	Mercury supports this amendment. Mercury seeks Policy 3 implement the correct tests in line with the RMA.	Allow
67 - 7	Port of Tauranga	Policy 3	Support	Mercury supports this amendment. Mercury seeks Policy 3 implement the correct tests in line with the RMA.	Allow



76 - 42	Federated Farmers	Policy 3	Support	Mercury supports this amendment. Mercury seeks Policy 3 implement the correct tests in line with the RMA.	Allow
10 - 1	Toi Te Ora Public Health	Policy 3	Oppose in Part	Mercury supports the intent of this submission. However, the relief sought seems more appropriate as an assessment criteria on technical matters. Mercury is happy to engage on this matter.	Disallow
58 - 15	Horticulture NZ	Policy 3	Oppose in Part	Mercury supports the intent of the submission, but considers the air quality guidelines are a relevant tool to be considered.	Disallow
67 - 20	Port of Tauranga	Policy 3	Support in Part	Mercury supports the intent of the submission. The text "contribute to" is problematic to this policy, as emissions which have a cumulative effect no matter how minor, could be preclude use and development.	Allow in Part
37 - 14	Oji Fibre Solution	Policy 3	Support in Part	Mercury supports the intent of the submission to protect Regionally Significant Infrastructure.	Allow in Part
45 - 19	Fonterra Ltd	Policy 3	Support in Part	Mercury supports the intent of the submission to protect Regionally Significant Infrastructure.	Allow in Part
50 - 24	Ravensdown Ltd	Policy 3	Support	Mercury seeks Policy 3 implements the correct tests inline with the RMA. The addition of "remedy or mitigate", would allow for better outcomes.	Allow
58 - 46	Horticulture NZ	Policy 3	Support in Part	Mercury supports the intent of the submission to protect Regionally Significant Infrastructure, however considers the wording could be improved.	Allow in part
19 - 22	Z Energy Ltd	Policy 3	Oppose	Mercury seeks Policy 3 implement the correct tests in line with the RMA.	Disallow
51 - 5	Nga Potiki Resource Management Unit	Policy 3	Oppose	Mercury seeks to ensure the correct RMA tests are applied to policy for air discharges. Mercury does not support a prohibitive approach to the management of air discharges.	Disallow
68 - 6	Ngati Ranganui Iwi Society Inc	Policy 3	Oppose	Mercury seeks to ensure the correct RMA tests are applied to policy for air discharges. Mercury does not support a prohibited approach to the management of air discharges.	Disallow
21 - 7	Jodie Bruning	Policy 4	Oppose	Mercury supports the intent of this submission, however Policy 4 is focused on the acceptability of air discharges. Policy tests need to be in line within appropriate statutes and guidelines. The relief sought reads like implementation methods, or state of the environment monitoring requirements, rather than a policy assessment test.	Disallow
34 - 1	McAlpines	Policy 4	Oppose	Mercury seeks Policy 4 implements the correct tests in line with the RMA. The Air Plan should regulate volumes discharged to the air shed and manage effects, not be concerned with scale of activities, which is a district plan matter.	Disallow



37 - 15	Oji Fibre Solution	Policy 4	Support	Mercury supports consideration of functional requirements for strategically important industry and infrastructure. Consideration of which activities are strategically important to the region needs to be guided by the RPS, and national policy statements which need to be given effect to.	Allow
37 - 16	Oji Fibre Solution	Policy 4	Support	Mercury supports reference to relevant standards and guidelines. The correct policy test "have regard to" is also applied.	Allow
37 - 17	Oji Fibre Solution	Policy 4	Support in Part	Mercury supports the intent of this submission and welcomes engagement on this matter. Should the FIDOL factors be included within clause (e)?	Allow
45 - 20	Fonterra Ltd	Policy 4	Support in Part	Mercury supports the intent of the submission. However, these matters are covered in policy 3	Disallow
45 - 21	Fonterra Ltd	Policy 4	Support in Part	Mercury supports the intent of the submission. Wider policy discussion is needed to consider how policy enablers are assessed and Ballance d against the need to mitigate adverse effects.	Disallow
45 - 22	Fonterra Ltd	Policy 4	Support in Part	Mercury seeks Policy 4 implement the correct tests in line with the RMA. This is an existing s104 test, so will be considered regardless of policy.	Allow
45 - 23	Fonterra Ltd	Policy 4	Support in Part	Mercury supports the intent of this submission and welcomes engagement on this matter. Should the FIDOL factors be included within clause (e)?	Allow
58 - 4	Horticulture	Policy 4	Support in Part	Mercury supports the intent of this submission. However, seeks clarification and discussion on the outcomes for all emitters.	Allow in part
66 - 19	First Gas Ltd	Policy 4	Support	Mercury supports consideration of functional requirements for strategically important industry and infrastructure. Consideration of what activities are strategically important to the region need to be guided by the RPS, and national policy, which needs to be given effect to.	Allow
76 - 44	Federated Farmer	Policy 4	Support in Part	Mercury supports the intent of this submission and welcomes engagement on this matter. Should the FIDOL factors be included within clause (e)?	Allow
10 - 15	Toi Te Ora Public Health	Policy 4	Oppose	Mercury seeks Policy 4 implement the correct tests in line with the RMA. The obligation, or ability to remedy or mitigate exposure to contaminants, is the responsibility of the consent holder, or operator, rather than the population. It is not clear how the relief sought could be implemented.	Disallow
74 - 1	Bay of Plenty Regional Council	Policy 4	Support	Mercury seeks Policy 4 implement the correct tests in line with the RMA.	Allow



54 - 1	Tauranga City Council	Policy 4	Oppose in Part	Mercury seeks clarification as effects from consented discharges should be measured at the boundary of the relevant site, not within a site.	Disallow
58 - 16	Horticulture NZ	Policy 4	Oppose in Part	Mercury seeks clarification that by deleting the reference to AAQG's, how this would improve the implementation and interpretation of the policy. Mercury acknowledges that the guidelines are not statutory standards.	Disallow
7 - 6	Western Bay of Plenty District Council	Policy 4	Support in part	Mercury seeks clarification and wider implications of how removing the word "established", provides a fairer assessment for air discharges on activities which are consented or legally able to operate versus established activities. Mercury is happy to engage on this matter.	Allow in part
33 - 7	Ballance Agri-Nutrients Ltd	Policy 4	Support in Part	Mercury seeks Policy 4 implement the correct tests in line with the RMA.	Allow in part
19 - 8	Z Energy Ltd	Rule 1	Oppose in part	Mercury seeks Policy 4 implement the correct tests in line with the RMA. It is important that rules allow for effects from discharges that are within acceptable limits.	Disallow
63 - 4	Silver Fern Management Ltd	Rule 1	Oppose in part	Mercury seeks clarification how notional boundaries will be represented in a spatial sense. Mercury seeks that air discharges are assessed at the relevant locations, where sensitive receptors are located.	Disallow
67 - 8	Port of Tauranga	Rule 1	Support in Part	Mercury seeks Policy 4 implement the correct tests in line with the RMA. Mercury supports the relief for clauses a) and c)	Allow
68 - 11	Ngati Ranginui Iwi Society Inc	Rule 1	Support in Part	Mercury supports the intent of the submission, but consider setbacks as one form of mitigation. The relief sought should be covered by the requirement to avoid, remedy or mitigate adverse effects in accordance within relevant air quality standards and guidelines. Mercury is happy to engage on this matter and is supportive of the submitters request	Disallow
69 - 4	KiwiRail Holdings Ltd	Rule 1	Oppose	Mercury interprets that Rule 1 does not provide for any emissions from industrial trade premises as a permitted activity. The RMA provides scope for Regional Plans to provide a more permissive rule framework for emissions from industrial trade premises. Mercury seeks clarification on KiwiRails submission and relief.	Oppose
76 - 23	Federated Farmers of NZ	Rule 5	Support in Part	Mercury supports the intent of the submission, and that a bespoke approach needs to be taken to individual contaminants within rules. Mercury seeks to be included in discussions where we have submissions on rules 1, 5 and 16.	Allow in part
19 - 11	Z Energy Ltd	Rule 16	Support	Mercury seeks Policy 4 implement the correct tests in line with the RMA and supports a permissive rule framework for infrastructure related uses.	Allow
30 - 11	Trustpower Ltd	Rule 16	Support	Mercury seeks Policy 4 implement the correct tests in line with the RMA and supports a permissive rule framework for infrastructure related uses.	Allow



54 - 7	Tauranga City Council	Rule 16	Support in Part	Mercury seeks Policy 4 implement the correct tests in line with the RMA and supports a permissive rule framework for infrastructure related uses.	Allow
67 -11	Port of Tauranga	Rule 16	Support in Part	Mercury seeks Policy 4 implement the correct tests in line with the RMA and supports a permissive rule framework for infrastructure related uses. Mercury is reliant on electricity transmission and distribution to ensure electricity can be delivered to end users.	Allow
11 - 1	Waikato Regional Council	Definition Offensive or Objectionable	Oppose in Part	Mercury considers a definition for 'Offensive or Objectionable' is not required. This term is used within the RMA and case law has considered this based on a normal English language definition. The inclusion of the definition could result in a conflict between further court interpretation under the Act and the definition in the Plan. Further guidance on what is considered offensive or objectionable is also included in the MfE Good Practice Guide for Assessing and Managing Odour.	Disallow
33 -18	Ballance Agri-Nutrients Ltd	Definition Offensive or Objectionable	Oppose in Part	Mercury considers a definition for 'Offensive or Objectionable' is not required. This term is used within the RMA and case law has considered this based on a normal English language definition. The inclusion of the definition could result in a conflict between further court interpretation under the Act and the definition in the Plan. Further guidance on what is considered offensive or objectionable is also included in the MfE Good Practice Guide for Assessing and Managing Odour.	Disallow
54 - 21	Tauranga City Council	Definition Offensive or Objectionable	Oppose	Mercury interprets the relief sought to result in any human health effect being defined as Offensive or Objectionable.	Disallow
74 - 15	Bay of Plenty Regional Council	Definition Offensive or Objectionable	Support	Mercury supports the logic of the submission. The definition does not need to include allergic reactions, but if someone had an allergic reaction, the definition should not exclude it. The relief sought provides for this outcome.	Allow
58 - 5	Horticulture NZ	Definition Offensive or Objectionable	Oppose in Part	Mercury considers a definition for 'Offensive or Objectionable' is not required. This term is used within the RMA and case law has considered this based on a normal English language definition. The inclusion of the definition could result in a conflict between further court interpretation under the Act and the definition in the Plan. Further guidance on what is considered offensive or objectionable is also included in the MfE Good Practice Guide for Assessing and Managing Odour. Mercury acknowledges that Horticulture NZ's submission on this point is comprehensive.	Disallow



75 - 3	Swap Stockfoods Ltd	Definition Offensive or Objectionable	Oppose in Part	Mercury considers a definition for 'Offensive or Objectionable' is not required. This term is used within the RMA and case law has considered this based on a normal English language definition. The inclusion of the definition could result in a conflict between further court interpretation under the Act and the definition in the Plan. Further guidance on what is considered offensive or objectionable is also included in the MfE Good Practice Guide for Assessing and Managing Odour.	Disallow
76 - 37	Federated Farmers of NZ	Definition Offensive or Objectionable	Oppose in Part	Mercury considers a definition for 'Offensive or Objectionable' is not required. This term is used within the RMA and case law has considered this based on a normal English language definition. The inclusion of the definition could result in a conflict between further court interpretation under the Act and the definition in the Plan. Further guidance on what is considered offensive or objectionable is also included in the MfE Good Practice Guide for Assessing and Managing Odour.	Disallow
8 - 8	Jon Burchett	Definition Public Amenity Area	Oppose	The relief sought would include any public space, which is too general for the purpose of establishing sensitive receptors to discharges of contaminants to air.	Disallow
48 - 16	Lawter NZ Ltd	Definition Regionally Significant Infrastructure	Support in Part	Any definition for Regionally Significant Infrastructure needs to be include electricity generation activities, and those activities that the generation plant is reliant upon to operate.	Allow
7 - 19	Western Bay of Plenty District Council	Definition Sensitive Activity	Oppose	The relief is too general, some small adverse effects are tolerable. Cafes and some retails activities may exist within industrial zones, which will have air discharges in the locality. Mercury seeks greater clarity and rational on which activities are sought to be included within the definition and how the RMA tests do not adequately mitigate Councils concerns.	Disallow
50 - 20	Ravensdown Ltd	Definition Sensitive Activity	Oppose in Part	Mercury considers the RPS definition must be given effect to in the context of RPS objectives and policies. The focus of the Regional Air Plan is narrower than the RPS.	Disallow
74 - 17	Bay of Plenty Regional Council	Definition Sensitive Activity	Support in Part	Mercury supports more narrow policy test, however questions the need for "or area exposed to the contaminant". Mercury is happy to engage on the matter.	Allow in part
19 - 19	Z Energy Ltd	Definition Sensitive Activity	Support	The relief sought aligns with the relevant tests within the RMA framework.	Allow



19 - 18	Z Energy Ltd	Definition Reverse Sensitivity	Support	The relief sought aligns with the relevant tests within the RMA framework.	Allow
19 - 21	Z Energy Ltd	Definition Reverse Sensitivity	Support	The relief sought aligns with the relevant tests within the RMA framework.	Allow
33 - 4	Ballance Agri-nutrients Ltd	Definition Reverse Sensitivity	Support in Part	Mercury supports avoidance of reverse sensitivity effects from sensitive activities locating near industry or infrastructure.	Allow
30 -1	Trustpower	Whole Plan	Support	Mercury supports recognition and provision of renewable electricity generation within the Regional Air Plan.	Allow

