BEFORE THE GREATER WELLINGTON REGIONAL COUNCIL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of an application by **NCI Packaging (NZ) Limited** for a resource consent in relation to the manufacture of metal cans and associated processes at 66 Montgomery Crescent, Upper Hutt.

STATEMENT OF EVIDENCE OF SHANE FLITCROFT

Dated: 26 July 2021

INTRODUCTION

1. My full name is Shane Flitcroft. I am the Manager of NCI Packaging (NZ) Limited's (NCI) Upper Hutt Plant and I am authorised to make this statement on behalf of NCI. I have been employed by NCI at the Upper Hutt Plant since 2006 and have been involved with the aerosol lines since 1989.

The NCI Wellington Operation

2. The manufacture of industrial Cans from the Upper Hutt factory began in early 1997. Prior to 1997, the operation was located in Jackson Street, Petone.

3. In 2006, NCI acquired the Aluminium Aerosol business from Impact Manufacturing in Lower Hutt and relocated these operations to the current site.

4. The Site consists of the primary plant building, parking areas, loading and storage facilities, maneuvering areas and a large, grassed area. In addition, there is landscaping to the front and rear of the site with the rear of the site contained within a security fence. The whole of the interior of the factory is used for plant operations except for the redundant office block.

5. NCI currently employs 21 staff at Upper Hutt comprising:

- Management – 3;
- Manufacturing – 13;
- Engineering – 3; and
- Outward Goods & Storage Area – 2.

6. The factory generally operates from 6.00 am – 3.00 pm, 5 days a week but during busy times it can operate through to 11 pm.

NCI Corporate Values

7. NCI is a member of the Packaging Council of New Zealand. Within the Packaging Council we have embraced the Packaging Product Stewardship Scheme, a voluntary scheme that meets the requirements of Part 2 of the Waste Minimisation Act 2008. Our participation demonstrates our willingness to act responsibly and reduce the environmental effect of packaging waste in our communities.

8. NCI is an active member in many other industry associations, such as the Steel Can Association of NZ, the NZ Aerosol Association, the International Metal Decorators Association, Print NZ and EMA Northern. Membership of these industry associations involves NCI in many other environmental initiatives and ensures that we remain aware of emerging technologies that can be utilised to further improve our environmental performance.

NCI Upper Hutt - Process Description

9. There are two main operations carried out at the NCI plant:

- Manufacturing of Aluminium Aerosol cans; and
- Assembly of tinplated steel general line (industrial) cans.

10. Aluminium Aerosol cans are impact extruded from small Aluminium Discs (slugs) to form a cylinder, open at one end. To assist extrusion, a water soluble, environmentally friendly lubricant is applied to the Aluminium Slugs. Following extrusion, the cylinders are trimmed to length and then either undergo mechanical brushing to create a surface decorative effect or go directly to the wash plant.

11. The cylinder is then washed in preparation for decoration. After washing, a solvent-based protective coating is applied to the internal surface of the cylinder (internal lacquer), via two small spray guns, and is then cured in a continuous oven at 250°C. The temperature is critical to achieve full polymerisation of the coating and to impart the maximum chemical and physical properties of the coating. The emissions from the internal lacquer application process are directed to the Internal Lacquer/Assembly stack. The rest of the Aluminium Aerosol emissions are directed to the Line 2 Main Stack starting with the internal lacquer oven emissions.

12. The next three coating processes are on the external surface of the Can. A base coat is applied by roller to provide a good surface to print on. The cans are then printed by a 6-colour printer (cured at 160°C) before a protective over-varnish is applied and cured at 190°C. The basecoat, print and over-varnish coatings are cured by separate ovens following application at each stage. All of the solvents from the application drying and curing processes are captured and discharged through the Line 2 main stack.

13. The coated Can is then necked, shaped and the opening curled, before being packed for shipping to our customers.

14. Steel (tinplate) general line cans are manufactured by forming pre-printed and coated strips of tinplate into cylinders which are joined by welding in a special can making machine. This welded seam is coated with a narrow strip of lacquer (sidestripe) on the inside of the cylinder to protect the exposed steel from the product to be filled. The emissions from the Line 1 and 2 oven (used to cure the Sidestripe) are discharged from the Internal Lacquer/Assembly Stack.

15. The cylinder is then flanged at both ends to allow 'components' to be double seamed onto the cylinder.

16. Components generally consist of an End, Ring and Lid. The End is double seamed onto the bottom of the cylinder, by rolling the cylinder (body) flange and the component curl into a tight, hermetic seal. The End and Ring have a synthetic rubber compound on the seaming surface to seal the seam. The same seaming process is applied to the top of the cylinder to attach the ring or End with a screw nozzle. The fittings that hold the wire handle on the side of the body of the Can (bail ears) are spot welded onto the Can and then a Handle is fitted. The area of the spot welds is coated with a small spray of lacquer (bail ear repair) to seal the internal lacquer. The emissions from this operation are also directed to the Internal Lacquer/Assembly Stack.

17. The Can is then packed for shipping and delivered to customers together with a loose lid, that is applied after the product is filled into the Can.

Further Comment

18. NCI acknowledges and accepts its responsibility as a good corporate citizen. The Aluminium Aerosol lines in Upper Hutt ran for decades in Auckland and Lower Hutt without incident. NCI is aware however that in recent years there has been some concerns expressed by some of its neighbours over the emissions from its site. Mr Kevern will speak to the options investigated by NCI and the various steps taken to reduce these effects.

19. NCI has engaged Tonkin & Taylor (T&T) to assess the complaints, undertake field studies and make recommendations. NCI accepts T&T's recommendations and has trialed the use of a biofilter as a result. NCI accepts Ms Simpson's recommendations as to adjustment of the proposed conditions of consent and, subject to some further editing issues that Mr Kevern will speak to, our only remaining concern is as to the establishment and operation of a 'community liaison group' and the extent of annual reporting.

20. In our view, persons allegedly affected by odour from NCI's operations are a small narrow sample of residents from Mountbatten Grove. NCI is happy to meet with this group and for Council representatives to be present, but the response to this application would suggest that there is no pressing need for a meeting frequency greater than annually or a liaison methodology on a more elaborate scale than a scheduled meeting every 12 months.

21. Also, the scale of annual reporting should be in proportion with the level of information exchanged in neighbourhood communications, including any complaints received, so as not to be unnecessarily onerous.

Dated: 26 July 2021

_____

Shane Flitcroft