

## Fast Track Approval Application

2 May 2024

From: Craig Shearer  
To: Vipin Garg

You have requested that I undertake a general assessment of the relevant national policy statements (NPS) and national environmental standards (NES) against your Green Steel Project.

The relevant NPS/NESs are:

### 1. National Policy Statement for Freshwater (NPS-FM) 2020

A high-level ecological assessment of the property has revealed there are no rivers and there is one small water pepper (*Persicaria hydropiper*) wetland on peat soils at the north-east corner of the site. There are no plans to disturb this wetland or any area within 100m of it. This small wetland will be “avoided” in accordance with the effects management hierarchy set out in 3.21 of the NPS-FM.

The proposal prioritises the health of the downstream water bodies by ensuring all stormwater from earth-worked areas is treated before being discharged, and stormwater generated on the site once development is completed will be treated through either an engineered wetland or other treatment device to ensure there are no adverse effects upon downstream river systems. Domestic wastewater from the site will be treated and discharged to ground.

In accordance with Te Mana of te Wai (3.2 of the NPS-FM), efforts have been made to actively engage with tangata whenua via Ngaa Muka Development Trust, and this engagement will extend to engaging their expertise and knowledge in the management of stormwater diversions, treatment solutions, and discharges during the development phase of the project. Early engagement has been positive.

We note the site is within the catchment of the Waikato River catchment. The River was recognised for its significance in the Waikato-Tainui Treaty Settlement and the Waikato-Tainui Raupatu Claims (Waikato River) Act 2010. The Act requires activities requiring resource Management Act approval in the catchment that affect to River to have particular regard to its vision and strategy. Although the National Green Steel Limited is intending ongoing engagement and inclusion of tangata whenua in the project, with good design of sediment control and stormwater management, there will be no negative effects upon the health and wellbeing of the Waikato River.

In summary, we believe the project will be consistent with the Objective and Policies in the NPS-FM.

## **2. NPS for Renewable Electricity Generation 2011**

This NPS has the objectives of recognising the national significance of renewable electricity generation activities by providing for the development, operation, maintenance and upgrading of new and existing renewable electricity generation activities, with the aim the proportion of New Zealand's electricity generated from renewable energy sources increases to a level that meets or exceeds the New Zealand Government's national target for renewable electricity generation.

As part of this project is the development of a solar farm which will generate up to 20MW of the 35MW of electricity needed to power the project, the solar farm and use of renewable electricity generation is consistent with this NPS objective and the associated policies.

## **3. NPS Highly Productive Land 2022**

Reference to the New Zealand Land Resource Inventory maps reveals the property consists of class 4 and class 6 land. The NPS seeks to protect highly productive land which is defined as being predominantly Land Use Capability class 1, 2, or 3 land.

This NPS is not relevant to the project and the site.

## **4. NPS Indigenous Biodiversity 2023 (NPS-IB)**

There are no significant areas of vegetation nor significant habitats of indigenous fauna on the site as revealed in high level ecological assessment carried out by PDP on 23 April 2024. There is a small wetland on the site but this will not be impacted by the proposal.

The project is not inconsistent with this NPS and its objectives and policies.

## **5. NES Freshwater 2020 (NES-F)**

The NES-F applies standards to freshwater and, of potential relevance to this project to natural inland wetlands. Controls relate to activities within, or within a 10m or 100m setback from any natural inland wetland. The high-level ecological assessment of the property has revealed there is one small water pepper (*Persicaria hydropiper*) wetland on peat soils at the north-east corner of the site. There are no plans to disturb this wetland or carry out any vegetation clearance or earthworks within or within 100m of it.

The project is evaluated as being consistent with this NES.

## **6. NES for Greenhouse Gas Emissions (NES GHG)**

Air Quality Consulting NZ Limited (AQCNZ) has assessed the project for greenhouse gas emissions in accordance with the NES GHG. Overall what Green Steel is proposing will result in a reduction of greenhouse gas (GHG) emissions, through a reduction in fuel usage (exporting scrap steel and importing finished steel products) and through the recycling of steel using an EAF

compared to steel producing using s 9(2)(b)(ii) (reported to be ~8 times lower). While the proposed plant will result in lower GHG emissions, the proposed plant will be utilising natural gas to reheat and maintain the temperature of the billets before entering the rolling mill. Based on the estimated gas consumption it is expected that the site will exceed 500 tonnes of CO<sub>2</sub>-e per annum which would also require a resource consent under the National Environmental Standard for Greenhouse Gas Emissions (NES GHG). Additionally, if the site was to exceed 2,000 tonnes of CO<sub>2</sub>-e, Green Steel would develop an Emission Reduction Plan (ERP) as per the NES GHG.

## **7. NES for Assessing and Managing Contaminants in Soil to Protect Human Health**

The site history review indicates that no potentially contaminating activities included on the Ministry for the Environment's Hazardous Activities and Industries List (HAIL) have occurred on the area of the proposed steel plant site.

Site inspection and history review indicates that the site has been used for pastoral farming since at least in the early 1960's, but probably much longer. There is no woolshed and associated stockyards on the site footprint. No HAIL activities are identified within the steel mill and associated facilities site.

As no HAIL activities were identified there is no risk to human health or the environment if the proposed steel plant and associated construction and operation occurs.

As there is no potential source of contamination within the site, there is no ground contamination-related risk to people or ecological receptors during disturbance of soil as part of preparation works for the steel plant facility.

Craig Shearer