

Memorandum on Completeness and Scope

File	FTAA-2608-1278
Application	Redvale Landfill Expansion
To	Ben Bond, Team Leader LOA
From	
Date	16 September 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Redvale Landfill Expansion application, lodged by Waste Management NZ Ltd (the Applicant), received by the Fast-track Team on 26 August 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.

5. The Application was referred by the Minister for inclusion in the Fast-track consenting process under section 28 of the Act. The Minister accepted the referral application on 21 April 2026 and notified the EPA of the decision on the referral application on 24 April 2026.
6. The Application was lodged on 26 August 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was not subject to a further information request, therefore the date by which the EPA must make a decision under 46 is 16 September 2026.
7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The referred project is described in the Minister's referral decisions as:

To expand and extend the existing Redvale Landfill at 66 Landfill Access Road in Dairy Flat within the Auckland Region.

The project will include:

- a. an extension to the time period waste can be accepted at the existing Redvale Landfill to 2036*
 - b. an expansion of waste volume within the existing landfill footprint by approximately 3.1 million cubic metres*
 - c. an extension to the existing landfill to accommodate approximately 1.4 million cubic metres for a Class 2 landfill*
 - d. additional site modifications including movement of on-site ancillary facilities, infrastructure upgrades, and environmental management measures necessary to implement and maintain the proposed works.*
9. The application relates solely to the referred project.
 10. The substantive application contains a greater level of detail but is largely consistent with the project that was referred by the Minister, including the key elements of:
 - a. extending Redvale's life to bridge the Auckland Regional Landfill gap,
 - b. creating additional Class 1 airspace through reprofiling,

- c. constructing a Class 2 extension,
 - d. relocating ancillary facilities,
 - e. modifying stormwater/sediment infrastructure.
11. The substantive application mainly adds operational commitments, environmental controls, design detail, monitoring programmes, and some refinements (particularly odour management, Leachate Evaporator Unit (LEU) treatment, water takes, and pond management).

Fast-track consenting application process

Legislative context

12. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
- complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
13. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

14. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
15. This application has been lodged by Waste Management NZ Ltd. This person is an authorised person under the Act because they are the same specified person listed in the Minister's referral decision under section 27(2).
16. The approvals being sought are:
- a. An approval described in section 42(4)(a) (resource consent) checklist A.
 - b. The above listed approval is of the type set out in section 42(4) of the Act.
 - c. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

17. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

18. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
19. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
20. As set out in more detail in Appendix 2, the agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required.

Ineligibility

21. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
22. The list of ineligible projects includes activities:
 - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
 - in a customary marine or protected customary rights area without written agreement from the rights holder/group;
 - within an aquaculture settlement area without the required authorisation;
 - activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
 - that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
 - on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).

- That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
 - That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
 - That are undertaken for the purposes of an offshore renewable energy project.
23. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Fees and levies

24. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST;
 - Levy in the sum of \$140,000 plus GST; and

Consultation

25. I have consulted with and considered the consultation response from the following relevant consent authority:
- Auckland City Council for an approval described in section 42(4)(a) (resource consent).
26. A summary of the consultation is included as Appendix 2.

Assessment of compliance for each section of each application form

27. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
28. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
29. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
30. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	FTAA-2608-1278 (AEE, Section 5, pg 52)	Addressed, as referenced.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	FTAA-2608-1278 (AEE, Section 3, pg 18 and Appendix B)	Addressed, as referenced and section 3.7.7.
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: section 42; and	FTAA-2608-1278 (AEE)	Addressed in section 1.8 43(1)(b) addressed specifically in sections 1.1, 2, 9.4.1, 11.

	• sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.		43(1)(c) addressed in section 1.1. 43(1)(d) n/a 43(1)(e)(i) addressed in section 1.8 (Table 1.6) s 43(1)(f) n/a s 43(1)(g) n/a s 43(1)(h) addressed in 1.8 (Table 1.6) and application form 43(1)(i) addressed in 1.8 (Table 1.6) s 43(1)(j) addressed in 1.8 (Table 1.6) s 43(3)(a) addressed in 1.8 (Table 1.6)
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry;	FTAA-2608-1278 (AEE, Appendix C)	Addressed, as referenced.

	If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).		
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	N/A	
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	N/A	
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	FTAA-2608-1278 (AEE, Section 9, pg 104 and Appendix I)	Addressed, as referenced.
5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement:	FTAA-2608-1278 (AEE, Section 9, pg 104 and Appendix I)	Addressed, as referenced.

	• a regional policy statement or proposed regional policy statement; • a plan or proposed plan; • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.		
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	N/A	Although noted as N/A, section 7.14, (specifically section 7.14.3) identifies the statutory acknowledgment over the Rangitōpuni Stream.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an	N/A	

	application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;		
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	FTAA-2608-1278 (AEE, Appendix J)	Addressed, as referenced.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware of about the existing resource consent referred to in the notice.	FTAA-2511-1136-Auckland Council-Section 30 response	Addressed, as referenced.
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	FTAA-2608-1278 (AEE, Section 7, pg 73 and Appendix G and H)	Addressed, as referenced and in the Landfill Management Plan.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	FTAA-2608-1278 (AEE, Section 7, pg 73) and	Addressed, as referenced and in Appendix G and H.

		supporting Technical Reports	
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity:	FTAA-2608-1278 (AEE, Section 7, pg 73 and Appendix G and H)	Addressed, as referenced.

	(e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity:	FTAA-2608-1278 (AEE, Section 7, pg 73) and supporting Technical Reports	Addressed, as referenced.

	(d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.		
75(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	FTAA-2608-1278 (AEE, Appendix E)	Addressed, as referenced.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity	N/A	

	against any resource management matters set out in that document		
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	N/A	

Appendix 2: Consultation Summary

The following agency was consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

Consultation with Auckland City Council as the relevant consent authority for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)

Auckland City Council response:

"In terms of your request as to whether the submitted documentation meets the requirements of sections 42 and 43 FTAA, and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 FTAA, I note that there doesn't appear to be anything significant missing, although specialist reviews have yet to be undertaken.

Specifically, the relevant matters listed in clauses 5 to 10 of Schedule 5 appear to have been addressed in sufficient detail.

Additionally, I confirm that the written notice under Section 30(3)(b)/30(5) FTAA, dated 12 August 2026, remains accurate and final as of 1 September 2026."

