

11 June 2025

Statement of Experience and Qualifications – Rhys Hegley

Attention: The Expert Consenting Panel

National Green Steel Limited

RE: Statement of Experience and Qualifications

My full name is Rhys Leonard Hegley. I am a partner at Hegley Acoustics. I hold a Bachelor of Engineering from the University of Auckland (1993) and have attended specialist courses in acoustics in Australia and America. I am a member of the Institution of Professional Engineers New Zealand.

For the last 25 years, I have specialised in the measurement and assessment of noise. This work has included undertaking noise measurements and preparing assessments for resource consent applications and notices of requirement and attendance at council hearings, the District and Environment Court hearings and Boards of Inquiry.

My technical skills and experience that are directly relevant to the current proposal include the assessment of noise from large earthworks projects, such as roading and quarries and from large projects including petrochemical plants, power stations and dairy factories. I have worked with a number of scrap metal recyclers and steel plants, including Pacific Steel and New Zealand Steel.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,



Rhys Hegley

Hegley Acoustics

11 June 2025

Statement of Experience and Qualifications – Air Quality

Attention: The Expert Consenting Panel

Air Quality Report Author - Statement of Experience and Qualification – Jonathan Harland

My full name is Jonathan Dean Harland. I am a senior air quality consultant and hold a Bachelor degree in Applied Science from Auckland University of Technology. I am employed by Air Quality Consulting NZ Limited.

I have prepared the technical report and provided expert advice in respect of air discharges for the National Green Steel application.

My relevant experience involves over 19 years of professional practice across the areas of air discharges. My project work has included atmospheric dispersion modelling, environmental effects assessments, designing and implementing ambient quality monitoring programmes, landfill gas and odour monitoring. My work often involves supporting regulatory applications and providing expert advice.

I am accredited by the Clean Air Society of Australia and New Zealand (CASANZ) as a Certified Air Quality Professional (CAQP).

Air Quality Report Peer Reviewer - Statement of Experience and Qualification – Peter Stacey

My full name is Peter Warrick Stacey. I am a senior principal quality consultant and hold a Bachelor of Science from The University of Auckland and a Graduate Diploma in Business from Auckland University of Technology. I am the Manager Director of Air Quality Consulting NZ Limited.

I have reviewed the technical report and provided expert advice regarding air discharges associated with the National Green Steel application.

My relevant experience involves over 20 years of professional practice across the areas of air discharges. My project work has included atmospheric dispersion modelling, environmental effects assessments (AEE), hazardous release modelling, odour treatment system design, landfill

gas, workplace exposure assessments and odour monitoring. I have also been involved in assessing applications for regulators and have been called upon to provide expert evidence at the Environment Court and as part of the Council resource consent hearing process.

I am accredited by the Clean Air Society of Australia and New Zealand (CASANZ) as a Certified Air Quality Professional (CAQP).

Expert Code of Conduct

We have both read and are familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that we have abided by the Code in providing expert advice in relation to this application.

Yours sincerely,



Jonathan Harland
BAppSC, CASANZ CAQP
Senior Air Quality Consultant

Phone: [REDACTED]

Email: [REDACTED]



Peter Stacey
BSc, GradDip(Bus), CASANZ CAQP
Managing Director

Phone: [REDACTED]

Email: [REDACTED]

AIR QUALITY
CONSULTING NZ

10 June 2025

Statement of Experience and Qualifications – Ellen Cameron

Attention: The Expert Consenting Panel

National Green Steel Limited
[REDACTED]

RE: Statement of Experience and Qualifications

My full name is Ellen Ann Cameron. I am an archaeologist and heritage consultant and hold a MSc in Environmental Archaeology and Palaeoeconomy from Sheffield University (UK) 1991. I am a Co-Director at Clough & Associates Ltd.


I have provided a technical report and/or expert advice in respect to Archaeological Assessment for the National Green Steel application.

My relevant experience involves over 27 years of professional practice in the heritage consultancy field. I have worked on rural and urban based projects for applicants and councils in various parts of New Zealand, including Auckland, Northland and the Waikato. I have provided evidence at both council hearings and the environment court. My experience includes archaeological research, survey, excavation, analysis and report preparation, initially in Asia and I have worked full time in New Zealand carrying out assessments of effects for development and infrastructure projects since 2014. In my current role I am a project manager for numerous archaeological assessments as well as the section 45 archaeologist for archaeological monitoring and investigation of projects undergoing development.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,

DocuSigned by:

938063991469410...

Ellen Cameron
Clough & Associates Ltd

24th June 2025

Statement of Experience and Qualifications – Alelign Gessese

Attention: The Expert Consenting Panel

Project Reference: National Green Steel Limited

RE: Statement of Experience and Qualifications

My full name is Alelign Gessese. I am an energy lead who provides engineering consulting services in the energy and carbon space. I hold a Doctor of Philosophy (PhD) in Mechanical Engineering from Canterbury University. I am currently employed by Lumen Limited. I have provided a technical report in respect of emissions plan for the National Green Steel application.

My relevant experience includes over 10 years of professional service in the areas of energy and carbon. I am a Carbon and Energy Professionals (CEP) accredited Suitably Qualified Professional (SQP) for emissions plan reviews. I have worked on emissions plans, energy transition accelerators, energy efficiency initiatives, and decarbonisation projects for a range of clients across New Zealand. My experience includes conducting SQP reviews of numerous emissions plans for both councils and clients (applicants), as well as preparing an emissions plan myself. In my current role, I serve as an energy lead, responsible for managing and delivering energy-related work.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,



Alelign Gessese

Lumen Limited



National Green Steel
c/o Shearer Consulting

Attention: The Expert Consenting Panel
c/o [REDACTED]

18 June 2025

WWLA1339

Statement of Experience and Qualifications – Ground Contamination

My full name is Lauren Hayley Windross. I am a Contaminated Land Specialist and hold a Bachelor of Science (Honours) from the University of Auckland. I am employed by Williamson Water and Land Advisory Limited (WWLA).

I have provided technical report(s) and/or expert advice in respect of the contaminated land assessment for the National Green Steel application.

My relevant experience involves over 12 years of professional practice across the areas of contaminated site investigation, remediation and management. My experience covers sites across Auckland and New Zealand, from high-level scoping and risk assessment to detailed investigations to inform resource consents and development implications. My project work has included determining site histories and potential for contamination to be present, design and implementation of sampling plans, analysis of data in the context of relevant human health and environmental guidelines, and presentation of the implications for resource consents, remediation, earthworks controls and long-term management. I have provided evidence at Council hearings.

In my current role I lead WWLA's Contaminated Land team and provide advice on contamination management, earthworks management and industrial and trade activities.

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,

Lauren Windross

Senior Contaminated Land Specialist | [REDACTED]
[REDACTED] | www.wwla.kiwi

My full name is Robert Mark Bellingham. I am an environmental and planning consultant and hold a PhD degree in Planning from Auckland University and I am a Certified Environmental Practitioner (CEnvP) – Ecology Specialist. I am employed by Aristos Consultants Limited, but previously worked for Pattle Delamore Partners Limited where I provided technical report(s) and/or expert advice in respect of freshwater ecology for the National Green Steel application, and authored the report entitled Ecological Impact Assessment 61 Hampton Downs Road, May 2025.

My relevant experience involves over 40 years of professional practice across the areas of freshwater and terrestrial ecology, and environmental planning. I have worked on rural and urban based projects for applicants and councils across New Zealand. I have provided evidence at both council hearings and the Environment Court. My project work has included consent and plan change applications and providing technical advice (in the areas of freshwater and terrestrial ecology and environmental planning), informing district plan designations and rural subdivisions in the Auckland Unitary Plan.

In my current role I am a member of an EIANZ Disciplinary Committee addressing potential malpractice of a site contamination CEnvP.

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Dr Mark Bellingham – CEnvP Ecology Specialist, FEIANZ, PhD Planning, MNZPI
Planner & Ecologist
Aristos Consultants

████████████████████
NEW ZEALAND
████████████████████

10 June 2025

Statement of Experience and Qualifications – Andreas Heuser

Attention: The Expert Consenting Panel
National Green Steel Limited

Contact: [REDACTED]

1. RE: Statement of Experience and Qualifications

My full name is **Andreas Sebastian Heuser**. I am a Managing Director (employee) of Castalia Limited. I hold a Bachelor of Laws and a Bachelor of Arts from Victoria University of Wellington and a Master of Business Law specialising in economics (summa cum laude) from the University of Cologne. I have 20 years of professional experience providing economic, policy and legal advice for major infrastructure, energy and resource-sector projects in New Zealand and internationally.

I am the lead author of the report “**National Steel Limited’s Green Steel Project – Economic Impact Analysis**” (March 2025), prepared in support of National Green Steel Limited’s fast-track approval application (the *Report*). In that role I designed and oversaw the cost-benefit model, directed the analytical team, and took overall responsibility for the findings and conclusions presented.

Relevant experience

My relevant experience is as follows:

- Directed or managed economic-impact and cost-benefit studies for green- and blue-hydrogen, steel, energy, industrial projects, regulatory impact analysis and urban development plan changes, including:
 - Led the economic impact analysis for Ministry for the Environment of both the current Government’s Resource Management Act reforms (based on Expert Advisory Group report) and the previous Government’s similar reforms (based on Justice Randerson-led panel recommendations)
 - Economic analysis of potential for supercritical geothermal energy development and power generation in Taupo Volcanic Zone for the Institute of Geological and Nuclear Sciences
 - Evaluation of the feasibility of re-establishing a refinery at Marsden Point for Ministry of Business, Innovation & Employment (MBIE)
 - National-level hydrogen scenario modelling for MBIE
 - Economic evaluations of hydrogen/urea co-production facilities and the Ports of Auckland hydrogen production and supply project
- Led strategic and regulatory advice on large infrastructure investments (electricity, fuel, ports, water) for government agencies, multilateral institutions and private investors.
- Regularly present expert economic evidence to local authorities, select committees and international development institutions, and engage with regulators on behalf of clients.
- Professional memberships: Law and Economics Association of New Zealand (past President) and New Zealand Association of Economists.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 and confirm that I have complied with it in preparing the *Report* and this statement, and will do so when presenting any evidence in relation to this application. I confirm that the opinions expressed are within my area of expertise and that I have not omitted facts material to those opinions.

Signed:

A handwritten signature in black ink, consisting of a stylized 'A' followed by a series of loops and a wavy line.

Andreas Sebastian Heuser
10 June 2025

10 June 2025

Statement of Experience and Qualifications – Brenda Bartels

Attention: The Expert Consenting Panel

National Green Steel Limited

[REDACTED]

RE: Statement of Experience and Qualifications

My full name is Brenda Michelle Bartels. I am a senior ecologist and hold a Master's of Science degree from the University of Waikato. I am employed by Awa Ecology Limited.

I have provided a technical letter report in respect to freshwater fish within the watercourses at 61 Hampton Downs Road for the National Green Steel application.

My relevant experience involves over 18 years of professional practice across the areas of general ecology, specialising in freshwater ecology. I have worked on ecological projects across New Zealand, and predominantly in the Waikato region. My project work has included detailed freshwater and fisheries projects and research as well as catchment and restoration management. I have undertaken numerous Ecological Impact Assessment for consent and plan change applications.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'B Bartels', with a stylized flourish at the end.

Brenda Bartels

Senior Ecologist/Director

Awa Ecology



HYDROGEOLOGY • GEOTECHNICAL ENGINEERING • ENGINEERING GEOLOGY

LS/L4392-4/Is

10 June 2025

Statement of Experience and Qualifications – Lindsay Strachan

Attention: The Expert Consenting Panel
National Green Steel Limited

Dear Sir/Madam,

**RE: STATEMENT OF EXPERIENCE AND QUALIFICATIONS – LINDSAY STRACHAN
NATIONAL GREEN STEEL PROJECT**

My full name is Lindsay Julian Strachan. I am a professional civil engineer, with specialist experience in ground/geotechnical engineering and landfill/monofill design. I hold a Masters degree in Engineering (MSc Eng. (Civil)) from the University of Natal (SA), and am a registered Chartered Professional (CPEng. Reg No. 1165740) and a Chartered Member of Engineering New Zealand (CMEng(NZ)). I am a member of the Engineering Advisory Board to the University of Waikato and maintain research support to the Engineering School. I am also a Producer Statement author for Auckland Council.

I have provided technical reports and/or specialist advice in respect of Geotechnical Assessments, Earthworks Management Plan and Erosion and Sediment Control Plan, Monofill Engineering Design and related reports, for the National Green Steel application.

My relevant experience involves over 25 years of professional practice across the areas of Civil Engineering covering specialist experience in geotechnics, foundations, earthworks, stormwater and landfill engineering. I have worked on engineering projects involving large subdivisions, housing developments, largescale bulk earthworks projects, roads, and large and small landfill sites - across New Zealand and internationally (Africa, Middle East, Malaysia, UK, Italy). In my current role for the Green Steel Project, I provide specialist engineering support and advice on ground engineering (geotechnical and earthworks), and the monofill design.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours faithfully



LINDSAY STRACHAN CPEng.

Senior Engineer

EARTHTECH CONSULTING LTD

A: Water Takes – Groundwater Take, SW Te-use, Te Kauwhata Water Supply, Re-use (Earthtech)

Reviewer: Cameron King

Response: Earthtech – Lindsay Strachan

Date: 28 April 2025

Date: 2 May 2025

1. New Zealand Green Steel Ltd (NZGS) has identified a water requirement of maximum 2,800 m³ per day and maximum 840,000 m³ per year.
2. The Earthtech report has identified three local water supply options for meeting the water requirement:
 - a. taking groundwater via multiple bores at the site;
 - b. taking water from the Waikato River;
 - c. taking water from roof, road, hardstand and other open areas at the site (local catchment rain harvesting).
3. WRC expert Nicki Wilson has considered the information presented in the report relating to taking groundwater.
4. Both Earthtech and Ms Wilson have noted that interference between site supply bores themselves and site supply bores on neighboring bores seems a prominent risk that will require further assessment.
5. It seems to be the case that there is no guarantee that groundwater will be available in the quantity required because of the need – identified by Earthtech – for bores to be tapping aquifer fractures which are scarce on the site.
6. Taking groundwater in the quantities required would require resource consent.
7. In terms of the option of taking water from the Waikato River, a separate consent held by NZGS allowing this is not preferred because of high capex – headworks and reticulation – compared with increasing the amount of water that NZGS might be able to access via the Te Kauwhata Water Association (TKWA).

4. On-site aquifer permeability testing carried out to date indicates 12m of groundwater level interference for the two BH42 and BH54 production bore locations separated about 300m apart. Such interference is not uncommon for deep confined Waitemata aquifer bores. Bore interference effects have been allowed for in the estimated total groundwater resource yield at 1,540m³/d from four on-site bores. Further assessment is required of interference effects on neighbouring bores.
5. Groundwater yield is dependant on production bores intercepting fractured aquifer conditions – hence the need for site geophysics which allowed targeted drilling in fractured conditions for BH42 and BH54. The total resource assessment based on two additional bores requires further geophysics and test bore drilling at these locations. Sufficient site investigations have however been carried out for the resource consent assessment that is yet to be completed.
6. Agreed.

8. Taking water from the Waikato River in the quantities required would require a resource consent if NZGS does not opt to increase the supply from TKWA.
9. In terms of local catchment rain harvesting, Earthtech have made indicative calculations and note that further assessment from an expert in this regard will be required to better inform consideration. The calculations indicate that the quantities required would not be able to be met by this option.
10. Taking water from the local catchment as rain harvesting at volumes commensurate with the indicative calculations would require resource consent.
11. The current – as at 22 April 2025 – level of cumulative allocation for the Waikato River main stem catchments relevant to the NZGS site – Waikato River at Mercer and Waikato River at the CMA – is such that:
 - there are no allocation pressures requiring a first in first served approach be taken; and
 - water is available for allocation across all months of the year within each respective catchment’s primary allocable flow and if a resource was granted to NZGS:
 - a. to take groundwater in the specified quantities required, water would remain available for allocation with each catchment’s primary allocable flow across all months of the year;
 - b. to take water from the Waikato River in the specified quantities required, water would remain available for allocation with each catchment’s primary allocable flow across all months of the year;
 - c. to take water from the local catchment as rain harvesting at volumes commensurate with the indicative calculations, water would remain available for allocation with each catchment’s primary allocable flow across all months of the year.

<p>12. I do not expect that increasing the amount to be supplied to NZGS from the TKWA would trigger the need for an additional resource consent to take water.</p> <p>13. From the Earthtech report, it seems that there might be the possibility of the specified quantities being provided for by an integrated source approach instead of a single source. If this were to be the case, I note that WRC staff would be generally supportive in concept but would of course expect thorough planning and technical assessments be carried out for each respective source and potential associated activities a la intake structures, construction of bores, diversion and possible off-stream damming of water, use of water, etc.</p>	
B: Ground Contamination -PSI/DSI and Hazardous Substances storage and use (Williamson Water and Land Advisory)	
Reviewer: Josh Evans	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
<p>1. Overall, I consider that the report appropriately identifies areas of concern that potentially were subject to HAIL activities based on historic information review. However, it is considered that the sampling investigations to date have not appropriately delineated the potential contamination extent and therefore the report is not considered to have been completed in general accordance with MfE CLMGs #1 and #5. Please see my comments and reasoning below.</p> <p>2. Firstly, it is considered that the Asbestos/ACM investigation undertaken in accordance MfE CLMG/BRANZ and I agree that the works can be undertaken under PA <u>if</u> all ACM impacted soils are removed from site as part of remedial works.</p> <p>However, as proposed in the conclusions (Section 7) of the report, I disagree with the conclusion that no WRC consents will be required for contaminated land matters. If encapsulation of this material is undertaken as proposed in in</p>	

this section as a remedial option, this would require a consent under the WRP

5.3.4.7. Remediation of contaminated land can only be undertaken under the PA rule if clause b. is met '*No contaminants from the remediation of the contaminated land shall be discharged into water or onto land unless discharged to a landfill authorised in Section 5.2.7.*'.

3. Composite sampling is not appropriate for investigating the HAIL activities of concern (A1. And A8.). There are activities that do not tend to result in homogenous contamination with an area of concern and often results in hotspots where the activity was predominantly undertaken with the AOI. By undertaking composite sampling, there is a risk that any hotspots present will be diluted/masked due to compositing process.
4. Although the report notes that sub-surface samples will be taken, only surface samples were collected and reported on. Field observations also note that sampling locations reached a depth of 0.5 m bgl. There is no additional evidence included in the report that observations were made at depth and visual/olfactory observations are not appropriate to rely upon for assessing whether contamination is present at depth for HM. (Acknowledging that OCPs were all non-detects in surface samples, it is unlikely that OCPs will be present at depth)
5. Additionally insufficient details have been provided for the sub-samples including specific locations, whether the composite was compiled by the laboratory.

SMP

6. If encapsulation is proposed to be undertaken, delineation/validation sampling should be undertaken to confirm that all contaminated material is contained within the proposed cell and the 2-metre buffer remains appropriate.

C: Geotechnical Assessment (Earthtech)	
Reviewer: Not assigned	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
<ul style="list-style-type: none"> - An outside consultancy was engaged to provide geotechnical commentary at the Falls Rd site (G Basheer). - Upon receipt of the technical reports for the 61 Hampton Downs site, advice was sought from Earthtech as to whether: <ul style="list-style-type: none"> i. <i>the proposed monofill methodology and considerations are identical between the 61 Hampton Downs site and the 650 Falls Road, Maramarua site, or if there are any differences, and</i> ii. <i>whether the Earthtech report for the 61 Hampton Downs site includes all review observations/recommendations from G Basheer, or if there are any discrepancies. If there are different circumstances, please elaborate.</i> - The reason for this request is that an external review (by G Basheer or another suitably qualified expert) mightn't provide additional insights, given the prior work on a similar proposal. - Earthtec response was received on the 4/4/2025 addressing all matters, where in summary, it is understood that: <ul style="list-style-type: none"> i. the monofill methodology for both sites is similar, with minor differences in geology and soils. ii. all recommendations from G Basheer were applied, covering earthworks, stability, and stormwater controls. 	

<ul style="list-style-type: none"> - This address all earlier matters raised by WRC, where an external review can still be commissioned with quick turn-around if NZ Greensteel seek such an approach (TBA). 	
D: On-site treatment wastewater treatment & disposal system (Ormiston Associates)	
Reviewer: Full review not assigned	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
<p>Contact was made with Waikato District Council (WDC) regarding the Landuse Engineer's review of onsite wastewater disposal, as WRC lacks specialised engineers for treatment methodology review; WDC confirmation is expected soon, and any conditions would typically be part of a District Council landuse consent. Ms Nicki Wilson's comments (see Attachment 3) may aid the WDC assessment but don't provide an in-depth review of Ormiston's recommendations.</p>	
E: Monofill Engineering Report (Earthtech)	
F: Monofill Monitoring Report (Earthtech)	
Reviewers: Jonathan Caldwell / Nicki Wilson	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
<p>Notes</p> <ul style="list-style-type: none"> - High-level responses from Jonathan Caldwell are presented as Points 1-14 below; - Nicki Wilson prepared a technical review document, presented as Attachment 3 (Pg 7-9) to cover Groundwater Aspects <p>Slag Waste</p> <ol style="list-style-type: none"> 1. How will slag waste be managed? 	

2. Will it involve offsite disposal?
3. How will it be stored prior to disposal to minimize discharges to stormwater and surface water?

Acid Sulfate Soils

4. The site, particularly the northwestern end of the site is located within medium to high risk for occurrence of acid sulfate soils. Descriptions of peat soils and Typic Orthic Gley Soils towards the northern end of the site in the Ecological Assessment as well as reference to peat soils and H-K ash in the Geological assessment provides further confirmation that there may be a risk of acid sulfate soils in this area, as has been previously identified in the neighboring Hampton Downs Landfill site.
5. Please provide details for investigating for presence of acid sulfate soils and if confirmed to be present in areas that are to be excavated how these soils will be managed?

Subsoil Water Discharge

6. Where will the subsoil water discharge from the northeast monofill be discharged to?

Assessment of Surface Water Effects

7. No assessment has been provided on effects on Waipapa Stream associated with leachate leakage from the two monofills apart from predicted leakage flow rate and the assumption that any adverse effects will be fully mitigated by attenuation within the clay soils below the site. This really needs some further assessment based on worst case scenarios of transport (especially for the more mobile contaminants) and dilution capacity in the stream and existing baseline stream contaminant conditions.

8. Despite confirmation that all stormwater on site will be discharged via a large treatment pond at the northern end of the site with treatment to a high quality standard, there has been no assessment of effects of site stormwater discharges (post construction) on the Waipapa Stream (and eventual receiving environment, the Waikato River). A site stormwater discharge assessment should be provided that includes all of the potential building and processing activity contaminant sources. For example, discharges from the vehicle shredding processes and temporary storage prior to monofill disposal, discharges from the slag waste handling area and smelting operation, use of interceptors for petroleum hydrocarbons, high voltage substation insulator fluids etc.
9. Baseline monitoring in the stream is recommended to assist with setting trigger limits and establishing flowrates.

Proposed Monitoring Regime

10. In addition to the two sampling locations identified in Figure D in section 5 of the monitoring plan, will there be monitoring of discharges from the Northeastern monofill, the stormwater discharges from the SRP at the northern end of the site and also upstream and downstream of all discharge points so that impacts associated with the site operation can be easily identified and monitored?
11. In addition to pH, it is recommended that hardness and dissolved organic carbon is included in the surface water sampling to assist with any toxicity modifications that could be applied to copper and zinc concentrations for example.
12. Why is PFAS not included in the routine monitoring regime for SRP discharges, subsoil water discharges and groundwater? It should definitely be included.

<p>13. Consideration needs to be given to other relevant contaminants for inclusion in monitoring of discharges and surface water associated with other activities on site that could be discharged via surface stormwater runoff such as petroleum hydrocarbons for example and contaminants associated with slag handling for example like cadmium, arsenic, mercury, fluoride etc in addition to metals associated with car floc.</p> <p>Fire Risk Management and Contingency</p> <p>14. Detailed management and monitoring procedures and contingencies for addressing fire risk within the monofills should be provided.</p>	
G: Earthworks Management Plan and ESCP (Earthtech)	
Reviewer: Gareth Read	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
Mr Read and NZ Greensteel have verbally covered the proposal together, with it is understood that matters raised are being addressed.	
H: Air Quality/Dust (AQ Consulting NZ)	
Reviewer: Rachael O'Donnell	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
<p>Details will be supplied soon. Please note that WRC does not have in-house technical air specialists but has air scientists who can provide broader commentary on reports prepared by qualified experts. Ms. O'Donnell will advise in this capacity. If NZ Steel seeks an external consultant review, WRC can arrange this as needed.</p>	

I: Ecology Assessment (PDP)	
Reviewer: Josh Smith (Ecology) / Kaitlin Morrison (Wetlands)	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
<p><u>Mr Josh Smith feedback</u> Details will be supplied soon</p> <p><u>Ms Kaitlin Morrisons feedback</u></p> <ol style="list-style-type: none"> 1. I have completed a review of the proposal in relation to wetlands, including reviewing the documents mentioned below. As requested given the time constraints, this is a high-level, desktop based review. My initial thoughts are: 2. WRC has no wetlands mapped within the area of the site development. The nearest wetlands we have recorded are around 2km away. An assessment is needed to confirm any potential connection between water onsite and any possible downstream wetlands. If there is a connection, then assessment of the stormwater, treated discharge, and sediment would be needed to determine level of any potential effects. There is also mention of infilling drains and collection and re-use of stormwater. Will the water currently in the drains, and that collected on site. include water that potentially naturally would have reached downstream waterways and wetlands? 3. The proposal assessed the northern part of the site for wetlands and I agree with the methods used and conclusions reached. There is no mention of assessing the rest of the site but I presume someone experienced did a review and confirmed no potential wetlands are present? Also, as mentioned above, has this expert assessed any potential connection to possible downstream wetlands and potential effects? If there is connection to downstream wetlands then, depending on the connections etc, I would potentially have similar 	

<p>questions/concerns as previously discussed relating to the Maramarua Monofil proposal.</p> <p>4. I agree with the preparation of a Native Planting Plan for the wet areas in the northern section, as well as assessing the stormwater discharges and treatment methods, as mentioned in the proposal.</p>	
J: Greenhouse Gases Comparative Emissions Assessment (Lumen)	
Reviewer: Rachael O'Donnell	Response: Earthtech – Lindsay Strachan
Date: 28 April 2025	Date: 2 May 2025
As above, details will be supplied soon.	

Should you have any questions, please don't hesitate to contact me.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'L J Strachan', with a large, stylized 'S' at the beginning.

L J STRACHAN

Senior Engineer CPEng.

EARTHTECH CONSULTING LTD



National Green Steel
c/o Shearer Consulting

Attention: The Expert Consenting Panel
c/o [REDACTED]

18 June 2025

WWLA1339

Statement of Experience and Qualifications – Hazardous Substances

My full name is Steve James Tyson. I am a Hazardous Substances Specialist and hold a Bachelor of Science (Zoology) and a Post Graduate Diploma (in Environmental Management) from the University of Auckland. I am employed by Williamson Water and Land Advisory Limited (WWLA) and Hazman NZ Ltd.

I have provided technical report and expert advice in respect of hazardous substances for the National Green Steel application.

My relevant experience includes over 30 years of professional practice in the field of environmental management in industry, including roles such as Pollution Response Team Leader at the Auckland Regional Council, and Senior Environmental Advisor at Refining NZ (now Channel Infrastructure). More recently I completed training to become a WorkSafe authorised Compliance Certifier (for both Location Compliance Certification (LCC) and Stationary Container System Compliance Certification (SCSCC)) under the Health and Safety at Work (Hazardous Substances) (HSW-HS) Regulations.

I have undertaken compliance auditing of high risk industrial sites, pollution incident response (hazardous substance spills) and subsequent enforcement where required, consent compliance monitoring and reporting, air quality reporting, contaminated groundwater monitoring/ remediation, stormwater monitoring and reporting, hazardous substance audits and subsequent issuing of LCC's and SCSCC's (both as a competent person under the HSW-HS performance standards and now as a WorkSafe authorised compliance certifier), hazardous waste management and disposal, contaminated land investigation and reporting.

In my current role I provide technical advice to WWLA in the area of hazardous substances regulations and assessment, and work independently issuing LCC's and SCSCC's.

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,

Steve Tyson

Senior Hazardous Substances Specialist | + [REDACTED]

www.wwla.kiwi

WorkSafe Authorised Compliance Certifier # 100270

11 June 2025

Statement of Experience and Qualifications – Vanessa Dally

Attention: The Expert Consenting Panel

Stantec New Zealand
[REDACTED]

RE: Statement of Experience and Qualifications

My full name is Vanessa Louise Dally. I am an environmental scientist and hydrogeologist working in consultancy. I hold a BA/BSc, and a Master's degree in Geology from the University of Auckland. I am currently employed by Stantec New Zealand.

I have provided the following technical report *Green Steel Hydrogeological Assessment of Environmental Effects* (prepared by Stantec for National Green Steel on 9 June 2025) for the National Green Steel application.

My relevant experience involves 20 years of professional practice in consultancy across the areas of hydrogeology and environmental science. I have worked on rural and urban based projects for applicants, councils and government departments across New Zealand and Australia. My project work includes technical inputs into consent and plan change applications providing advice in the areas of hydrogeology and contaminated land. Relevant projects I have worked on currently/recently include hydrogeological and contaminated land inputs for early works resource consenting for Te Puna Hapori Whanganui Courthouse and Police Hub (Ministry of Justice and New Zealand Police); hydrogeological services and advice to the Riverlink Alliance for the construction of the new Melling Bridge and interchange in Lower Hutt; and review of aquifer impact assessments for proposed large scale developments in NSW on behalf of the Department of Climate Change, Energy, the Environment and Water.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,



Vanessa Dally

Stantec New Zealand

greenwood associates

10 June 2025

Statement of Experience and Qualifications – Christopher Campbell

Attention: The Expert Consenting Panel
National Green Steel Limited



RE: Statement of Experience and Qualifications

My full name is Christopher Philip Campbell. I hold a Bachelors of Landscape Architecture from Lincoln University and currently hold the position of Senior Associate - Landscape Architect at Greenwood Associates.

I have been practicing landscape architecture for eighteen (18) years and the last five (5) years of which, I have been practicing in New Zealand. Prior to this I was practicing in the middle east.

I have been a registered member of the New Zealand Institute of Landscape Architects (NZILA) since December 2023. I have been preparing landscape assessment reports since February 2020. During this time, I have prepared approximately seventy (70) landscape and visual assessment reports across both urban and rural environments. I am also a graduate of the 'Making Good Decisions' certification programme.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chris Campbell', with a long horizontal flourish extending to the right.

Christopher Campbell

2 July 2025

Statement of Experience and Qualifications – **Craig Inskeep**

Attention: The Expert Consenting Panel

Kinetic Environmental Consulting Limited
[REDACTED]

RE: Statement of Experience and Qualifications

My full name is Craig Nathan Inskeep. I am an environmental and planning consultant and hold a Bachelor's degree in Science (Resource and Environmental Planning) from Waikato University. I am employed by Kinetic Environmental Consulting Limited.

I have provided expert planning advice in respect of the substantive application, including the Assessment of Environmental Effects and proposed conditions for the National Green Steel application.

My relevant experience involves over 23 years of professional practice across the areas of local government and planning consultancy. I have worked on rural, large-scale infrastructure, commercial and industrial projects for both applicants and councils acting as the council officer. My project work has included consent assessments and the preparation of applications, and providing technical planning advice. I have provided evidence at both council hearings and commissioner-led panel hearings, and the Environment Court for resolution by way of mediation. My career has seen particular involvement across the Waikato, Auckland and Bay of Plenty, Manawatu, Hawkes Bay and Tasman regions.

In my current role, I am employed as a Senior Planner for a planning consultancy, Kinetic Environmental Consulting, with varied work across a number of areas including infrastructure, industrial, intensive farming, outdoor educational facilities, urban development, subdivision and development projects.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,



Craig Inskeep
Kinetic Environmental Consulting Limited

10 June 2025

Statement of Experience and Qualifications – Ashley Watson

Attention: The Expert Consenting Panel

National Green Steel Limited
[REDACTED]

RE: Statement of Experience and Qualifications

My full name is Ashley Martin Watson. I am a Chartered Professional Engineer and hold a Bachelor of Engineering (Honours) from the University of Auckland. I am employed by Airey Consultants Ltd.

I have provided technical report(s) and/or expert advice in respect of stormwater and roading for the National Green Steel application.

My relevant experience involves over 12 years of professional practice in civil engineering design and construction management. I have worked on rural and urban based projects for private and public sector clients across New Zealand and Australia. I have provided evidence at council hearings. My project work has included consent and plan change applications and providing technical advice for large subdivisions and commercial developments.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'A' followed by a stylized flourish.

Ashley Watson BE(Hons) CEngNZ CPEng IntPE(NZ)

Airey Consultants

My name is Judith Victoria Makinson. I am a Director at CKL NZ Ltd, specialising in transportation engineering.

I hold a Bachelor's degree in civil engineering and a Master's degree in transportation engineering and planning from the University of Salford (UK). I am a Chartered Professional Engineer and am a Chartered Member of Engineering New Zealand. I am also a Chartered Engineer in the United Kingdom and a Member of the Institution of Civil Engineers. I have over 25 years' international experience working as a transportation engineer in both New Zealand and the United Kingdom with Arup, WSP Group, Gifford, TDG, Stantec and CKL.

I have undertaken Integrated Transportation Assessments (ITAs) for major developments such as for 180ha of industrial land at Southern Gateway in Auckland and 450 residential dwellings at Northview in Hamilton. I have experience in assessing the traffic and transportation effects of rezoning land through plan change processes, including acting for South Waikato District Council in relation to rezoning 40ha of rural land to industrial in Putāruru.

I am qualified as an Independent Hearing Commissioner and in this role I have experience considering the effects of major infrastructure projects through notice of requirement processes, rezoning as well as individual resource consent applications. These include the Te Ahu a Turangi Manawatū Gorge Road replacement, Te Pūtahi Ladies Mile rezoning and the Kiwirail Regional Freight Hub at Bunnythorpe.

I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and confirm that I have complied with that code in preparation of this Transportation Assessment Report, and in relation to any further information requests. If required to give evidence, I will comply with the code in its preparation and presentation. The assessment I have undertaken and any evidence I may present is within my area of expertise, except where I have stated my reliance on other identified evidence. I have considered all material facts that are known to me that might alter or detract from the assessment I have undertaken.

A handwritten signature in black ink, appearing to read 'Judith Makinson', with a stylized, cursive script.

Judith Makinson

11 June 2025

Statement of Experience and Qualifications – Trisha Simonson

Attention: The Expert Consenting Panel

National Green Steel Limited
[REDACTED]

RE: Statement of Experience and Qualifications

My full name is Trisha Lynley Simonson. I hold the position of Senior Engineering Geologist at Ormiston Associates Ltd, which is a consultancy specialising in geotechnical engineering, geology and on-site wastewater treatment and land disposal; a position which I have held since October 2017. Previously to that, I worked as a Senior Resource Officer - Infrastructure at Waikato Regional Council, for nine years. I have a Bachelor of Science in Earth Science and a Master of Science with First Class Honours in Earth Science from the University of Waikato.

I have provided a technical report and expert advice in respect of domestic on-site wastewater treatment and disposal design and effects assessment for the National Green Steel application.

My relevant experience involves over 27 years of professional practice including the investigation and design of on-site wastewater treatment and land disposal systems for individual dwellings, subdivisions, commercial establishments and institutions, together with gaining resource consents. I am regularly engaged to provide technical reviews of on-site wastewater designs for the Waikato Regional Council, Horizons Regional Council and Bay of Plenty Regional Council. I have provided evidence at both council hearings and the environment court. My project work has included consent and plan change applications and providing technical advice (in the area of on-site wastewater) informing regional plan preparation.

Expert Code of Conduct

I have read and am familiar with the Environment Court's Code of Conduct for Expert Witnesses 2023 (the Code) and can confirm that I have abided by the Code in providing my expert advice in relation to this application.

Yours sincerely,



Trisha Simonson
Ormiston Associates Ltd.