

Green Steel Project - Proposed Draft Conditions, Waikato Regional Council

2 February 2026 Update

GENERAL CONDITIONS

- 1) The development must be undertaken in general accordance with the information and plans submitted by the Consent Holder in support of application number FTAA-2506-1074 dated 1 July and officially received as being completed by the Fast Track Approvals Panel on the 29th Day of July 2025 National Green Steel – 61 Hampton Downs Road, Fast Track Approvals Act Substantive Application: To Construct and Operate a Structural Steel Manufacturing Plant and Accessory Activities as prepared by Kinetic Environmental Consulting Limited including all relevant Technical Assessment information as attached to the substantive application.

The development must be undertaken in general accordance with the following plans, stamped 'approved', and appended to these conditions.

- 2) In the case of inconsistency between the documents described in Condition 1 and the conditions of this consent, the conditions of consent must prevail.
- 3) The consent holder must pay to the Waikato Regional Council any administrative charge fixed in accordance with section 36 of the Resource Management Act 1991, or any change prescribed in accordance with regulations made under section 360 of the Resource Management Act 1991.
- 4) All consents shall lapse five years from the decision notification.

Cultural

- 5) The Consent Holder must invite Ngā Muka Development Trust (“Ngā Muka”) to organise a powhiri prior to the commencement of operations of the steel plant.
- 6) The Consent Holder must invite Ngā Muka to organise a cultural induction programme, to form part of the site induction, for all contractors working at the site during the development and commissioning phase, including earthworks and construction of the steel plant and associated buildings.
- 7) The Consent Holder must undertake measures to protect the adjacent Waipapa Stream from any sediment discharge or retention during the earthworks and construction phase.

Cultural Management Plan

- 8) The Consent Holder must prepare a Cultural Management Plan in conjunction with Ngā Muka. The objectives of the Cultural Management Plan are to:
- a) Provide cultural protection to the history and surrounds of the site.
 - b) Provide cultural authenticity to the landscape, design and surrounds of the site.
 - c) Provide cultural safety for those onsite during the construction and commissioning phase of the project.
 - d) Provide cultural awareness and understanding of the site and wider region.

As part of the cultural management plan, the consent holder must agree the basis for ongoing monitoring and invite suitably qualified kaitiaki representatives from Ngā Muka to facilitate Mātauranga Māori monitoring of air and water associated with the site at least once per year using methodologies consistent with the Whangamarino Mātauranga Māori Dashboard.

A copy of the agreed cultural management plan must be submitted to Waikato Regional Council for information prior to the commencement of the physical works.

- 9) The Consent Holder must engage Ngā Muka to provide a cultural monitor during the design, construction and commissioning phase of the project. The cultural monitoring plan as outlined in condition 7, must be implemented by a Cultural Monitor ('CM') designated by Ngā Muka to address cultural matters. The CM shall facilitate cultural inductions and blessings; participate at toolbox meetings; complete cultural component of health and safety reports and sign-offs; provide cultural advice and input on design, landscaping, earthworks, construction, air and water testing/monitoring; execute and coordinate discovery of cultural artifacts, indigenous species or human remains. Weekly reports must be provided by the CM to the Consent Holder and Ngā Muka.

Advice note:

The CM will only apply during the design, construction and commissioning of the Green Steel project onsite. The CM is not a full-time role and is required only on cultural matters.

Accidental Discovery protocols

- 10) In the event that Koiwi (human remains) or other Taonga or archaeological evidence is uncovered in the course of bulk earthworks, The consent holder must adopt archaeological discovery protocols and procedures validated and endorsed by Ngā Muka. The works in the immediate vicinity of the remains or artefacts must cease immediately, and Ngā Muka, the Police, and/or Heritage New Zealand Pouhere Taonga and the Waikato Regional Council must be notified by the Consent Holder as soon as practicable. Works may recommence with the written approval of the Waikato Regional Council. Such approval must be given after the Waikato Regional Council has considered:
- a) Tangata whenua interests and values;
 - b) The Consent Holder's interests;

- c) Any archaeological or scientific evidence;
- d) Any requirements of the Police; and
- e) Whether any necessary statutory authorisations have been obtained from Heritage New Zealand Pouhere Taonga.

Review

- 11) The Waikato Regional Council may, during the six-month period commencing 1 November following initial operation of the site and every fifth year thereafter, serve notice on the Consent Holder under section 128(1) of the Resource Management Act 1991, of its intention to review the conditions of the resource consents for the following purposes:
- a) To review the effectiveness of the conditions of this resource consent in avoiding or mitigating any adverse effects on the environment, and if necessary to avoid, remedy or mitigate such effects by way of further or amended conditions; or
 - b) If necessary and appropriate, to require the Consent Holder to adopt the best practicable option to remove or reduce adverse effects on the surrounding environment; or
 - c) To review the adequacy of and the necessity for monitoring undertaken by the Consent Holder;
 - d) To review the appropriateness of any volume specified within this consent and, if necessary, to address any inappropriateness of any volume by way of reducing any volume;
 - e) To review the consistency of the conditions of this consent with the vision and strategy set out in Schedule 2 of the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 and any subsequent changes thereof; and if necessary to address any inconsistency of the conditions of this consent with the vision and strategy by way of further or amended conditions;
 - f) To commence a review of the conditions of this consent pursuant to section 128(1) of the Resource Management Act 1991 to take account of any change to the Waikato Regional Plan (WRP) being proposed as a result of any catchment investigation undertaken by WRC in terms of WRP 3.3.4.9 Review Allocable Flows/Sustainable Yields and WRP Table 3-4A Catchment Investigation Dates for Waikato River (4) Ngāruawāhia at the confluence of Waipa (excluding the Waipa River) to Mercer Bridge.

Reporting

- 12) The Consent Holder must compile an Annual Report for the activities authorised by this consent, and forward that report to the Council by 1 November of each year, or such other date agreed to in writing by the Council. As a minimum the report must:
- a) Analyse and summarise the results of monitoring undertaken, and records kept, in accordance with the conditions of this consent;
 - b) Provide a log of water use for the site including that abstracted from groundwater within the previous 12 months. The report should also consider the effectiveness of the rainwater harvesting;

- c) Comment on compliance with all conditions of this consent;
- d) Make recommendations in relation to monitoring programme changes, operational changes or other matters as appropriate, which are required to ensure compliance with the conditions of this consent;
- e) Summarise and analyse any non-compliance or difficulties in achieving compliance with the conditions of this consent;
- f) Comment on the performance and adequacy of the wastewater disposal system, including matters of compliance with conditions of this consent;
- g) Comment on any complaints received in relation to the discharges to air from the site;
- h) Any works that have been undertaken to improve environmental performance or that are proposed to be undertaken in the up-coming year to improve environmental performance in relation to the activities authorised by this consent.

AUTHORISATION FOR EARTHWORKS AND OVERBURDEN PLACEMENT

Pre Construction

- 1) Prior to the commencement of any construction works authorised by this resource consent the Consent Holder must appoint an appropriately qualified and competent Construction Representative (s) who must supervise the construction and will be the principal contact person for matters relating to these resource consents. The Consent Holder must inform the Waikato Regional Council of the representative's name and contact details prior to the commencement of any works. If the principal contact person changes, the Consent Holder must inform the Waikato Regional Council of a new representative as soon as practicable.
- 2) The Consent Holder must be responsible for all contracted operations related to the exercise of this resource consent and must ensure contractors are made aware of the conditions of this resource consent and ensure compliance with those conditions.
- 3) A copy of this consent must be kept onsite at all times that physical works authorised by this consent are being undertaken and must be produced without unreasonable delay upon request from a servant or agent of the Waikato Regional Council.
- 4) The design and construction of the works associated with this resource consent must be carried out under the supervision of a person who has experience and qualifications appropriate to supervise the design and construction of such works.
- 5) At least 15 working days before the commencement of activities associated with this consent, the Consent Holder must notify the Waikato Regional Council

Advice Note:

Notification can be via email to ConsentMonitoringQueries@waikatoregion.govt.nz with the consent number, address of the property and the date for when the works will commence.

- 6) The Consent Holder must arrange and conduct a pre-construction site meeting and invite with a minimum of 10 working days' notice, the Waikato Regional Council representatives and the Construction Representative nominated under condition 10 of this consent, the contractor, any other party representing the Consent Holder and the Cultural Monitor prior to any works authorised by this consent commencing on the site.

Advice Note:

In the case that any of the invited parties, other than the site representative, do not attend this meeting, the Consent Holder will have complied with this condition, provided the invitation requirements are met.

Construction Management Plan

- 7) The Consent Holder must provide the Waikato Regional Council with a Construction Management Plan (CMP), at least 10 working days prior to the proposed commencement of activities authorised by this consent. The objective of the CMP is to document the measures by which the Consent Holder intends to manage the site and operations during the construction phase and how these will be managed to ensure that any actual or potential adverse effects are avoided, remedied or mitigated and to comply with all conditions of resource consent during construction and must include at least the following:
- a) Communications Plan including the details of the contractor and site representatives during the construction phase;
 - b) Responsibility for supervising and reporting compliance with the Construction Management Plan;
 - c) A construction methodology including construction and design details;
 - d) Site plans, including location of access routes, parking areas and laydown areas;
 - e) Anticipated hours of work concerning the construction activities by phase of the project;
 - f) An overview of the machinery to be used on site;
 - g) Health and Safety Plan and details of site security including methods to be adopted to ensure the safety of public, staff and contractors at all times during the works;
 - h) Location of proposed works and structures;
 - i) A schedule of construction activities;
 - j) Timing of works and contingency plan;
 - k) Erosion and sediment control methodology with appropriate reference to the Earthworks Management and Erosion and Sediment Control Plan and Dust Management Plan for the site;
 - l) Proposed spill prevention and response measures,
 - m) Dewatering and bypass pumping methods;
 - n) Rainfall response and contingency measures, including procedures to minimise adverse effects in the event of any rainfall event greater than 20 millimetres in the preceding 24 hours, other extreme rainfall or weather events and/or the failure of any key erosion and sediment control structures;
 - o) Any need for temporary road closures or other restrictions surrounding the roading network;
 - p) Public awareness measures, including signage to inform other road users and adjacent landowners and occupiers of adjoining and adjacent sites with an overview and programme of the physical works anticipated and contact details for the nominated site representative(s);
 - q) Works and activities required to stabilise the site to an erosion-resistant site as soon as practicable after construction ceases, including re-grassing and/or replanting site remediation, rehabilitation and stabilisation;
 - r) Address the management of any discharges associated with the disturbance of acid sulphate soils in the event that they are encountered during earthworks. A

plan mapping the extent of acid sulphate soils (if confirmed onsite) and an outline of the management approach to be undertaken, including any procedures to be adopted during construction taking into account any relevant Waikato Regional Council Guidance Documents;

The CMP must be certified in writing by the Waikato Regional Council acting in a technical certification capacity prior to any works authorised by this consent commencing. Council's certification will be based on its assessment as to whether the CMP addresses the matters required by parts a) to r) above and achieves its objective. The Consent Holder must undertake all activities authorised by this consent in accordance with the certified CMP. In the case of inconsistency between the CMP and the conditions of this consent, the conditions of consent prevail.

- 8) Any changes proposed to the CMP must be confirmed in writing by the Consent Holder and the Waikato Regional Council, acting in a technical certification capacity, that the changes continue to meet the objectives of condition 7, prior to the implementation of any proposed modifications.
- 9) The Consent Holder must ensure that a copy of the certified CMP, including any certified amendments, is kept onsite and this copy is updated within 10 working days of any amendments being certified, or prior to construction activities related to the amendment being carried out, whichever is the sooner.

Erosion and Sediment Controls

- 10) The Consent Holder must provide the Waikato Regional Council with an "Earthworks Management and Erosion and Sediment Control Plan" (E&SCP), at least 10 working days prior to the commencement of activities authorised by this consent. The objective of the E&SCP must be to minimise sediment discharge from the site to the extent practicable.

The E&SCP must as a minimum be based upon and incorporate those specific principles and practices which are appropriate for the activity authorised by this consent and contained within the Waikato Regional Council document titled "Erosion and Sediment Control – Guidelines for Soil Disturbing Activities" (Technical Report No. 2009/02 – dated January 2009), and must include at least the following;

- i. Details of all principles, procedures and practices that will be implemented to undertake erosion and sediment control to minimise the potential for sediment discharge from the site, including flocculation if required;
- ii. The design criteria and dimensions of all key erosion and sediment control structures;
- iii. A site plan of a suitable scale to identify;
 - a. The locations of waterways;
 - b. The extent of soil disturbance and vegetation removal;
 - c. Any "no go" and/or buffer areas to be maintained undisturbed adjacent to watercourses;

- d. Areas of cut and fill;
 - e. Locations of topsoil stockpiles;
 - f. All key erosion and sediment control structures;
 - g. The boundaries and area of catchments contributing to all stormwater impoundment structures;
 - h. The locations of all specific points of discharge to the environment; and
 - i. Any other relevant site information
- iv. Construction timetable for the erosion and sediment control works and the bulk earthworks proposed;
 - v. Timetable and nature of progressive site rehabilitation and re-vegetation proposed;
 - vi. Maintenance, monitoring and reporting procedures;
 - vii. Rainfall response and contingency measures, including procedures to minimise adverse effects in the event of extreme rainfall events and/or the failure of any key erosion and sediment control structures;
 - viii. Procedures and timing for review and/or amendment to the E&SCP; and
 - ix. Identification and contact details of personnel responsible for the operation and maintenance of all key erosion and sediment control structures;
 - x. Contingency plan details for managing the effects of acid leachate discharges to the environment in the event that acid sulphate soils are encountered during earthworks

The E&SCP must be certified in writing by the Waikato Regional Council acting in a technical certification capacity prior to any works authorised by this consent commencing and the Consent Holder must undertake all earthworks authorised by this consent in accordance with the certified E&SCP.

- 11) Any changes proposed to the E&SCP must be confirmed in writing by the Consent Holder and the Waikato Regional Council, acting in a technical certification capacity, prior to the implementation of any changes proposed.
- 12) Prior to bulk earthworks commencing on any area, the Consent Holder must submit to the Waikato Regional Council 'As Built Certification Statements', signed by an appropriately qualified and experienced person to certify that erosion and sediment controls have been implemented and appropriately constructed to minimise any sediment leaving the site and entering any stormwater drains or watercourses. Erosion and sediment controls must be in accordance with the certified E&SCP. Certified controls must include sediment retention ponds, decanting earth bunds, silt fences and diversion channels/bunds. The 'As Built Certification Statement' must include all information as specified in the 'As Built Certification Sheets' located on the Waikato Regional Council website (www.ew.govt.nz/earthworks) and supplied to the Waikato Regional Council within 5 working days of the completion of the construction of those controls.
- 13) The Consent Holder must ensure that all sediment-laden run-off from the site is treated by sediment retention structures. These structures are to be fully operational before bulk

earthworks commence and must be maintained to perform at least 80% of their operational capacity.

- 14) The Consent Holder must ensure that all erosion and sediment control structures are inspected on a weekly basis and within 24 hours of each rainstorm event that is likely to impair the function or performance of the controls.
- 15) During earthworks the Consent Holder must actively consider the on-site management of all the overburden materials, including disposal, storage, backfilling and management of topsoil within the area impounded by site perimeter controls, in a way that does not result in loss of sediments or dust beyond the boundaries of the site. Open Areas and long-term stockpiles for a period exceeding 3 months must be appropriately stabilised, revegetated or planted in grass for erosion control and visual mitigation purposes.
- 16) The Consent Holder must ensure that the suspended solids concentrations of water as measured at the points of discharge from the final sediment retention structures must not exceed a maximum of 100 grams per cubic metre, unless otherwise agreed in writing between the Consent Holder and the Waikato Regional Council.
- 17) If requested in writing by the Waikato Regional Council, the Consent Holder must undertake water sampling at the points of discharge of the final sediment retention structures and have the water samples analysed for suspended solids and turbidity. The sampling results must be made available to the Waikato Regional Council within 5 days of the results becoming available.
- 18) The Consent Holder must ensure those areas of the site where earthworks have been completed are stabilised against erosion as soon as practically possible and within a period not exceeding 14 days after completion of any works authorised by this consent. Stabilisation must be undertaken by providing adequate measures (vegetative and/or structural) that will minimise sediment runoff and erosion to the satisfaction of the Waikato Regional Council acting in a technical certification capacity. The Consent Holder must monitor and maintain the site until vegetation is established to such an extent that it prevents erosion and prevents sediment from entering any water body.
- 19) If any earthworks including excavation, filling or dewatering are undertaken within 3m of any neighbouring property boundary, the consent holder shall prepare a land settlement and groundwater monitoring assessment programme to be submitted to Waikato Regional Council for certification. The purpose of the programme is to:
 - a) Determine if there are any adverse land subsidence/settlement effects; and
 - b) Determine if there is any movement of groundwater in either direction towards or from the consent holder's property;
- 20) The following trigger levels will be used to determine if there are adverse effects for the purpose of condition 19 (a) and (b)):
 - a) More than 50mm of ground settlement occurs; or

b) There are changes in groundwater levels of more than 0.8m;

- 21) The Consent Holder must liaise with the Waikato Regional Council with a view to determining any reasonably practicable measures which shall be taken to remedy or mitigate any measurements exceeding the trigger levels in condition 20.
- 22) The Consent Holder must maintain erosion and sediment controls in place until suitable site stabilisation has been achieved, including a minimum grass coverage (80%) is achieved within the exposed areas subjected to earthworks. Re-vegetation and/or stabilisation of all disturbed areas is to be completed in accordance with the measures detailed in the document titled “Erosion and Sediment Control – Guidelines for Soil Disturbing Activities” (Technical Report No. 2009/02 – dated January 2009).
- 23) The consent holder must submit details and evidence of all stabilisation and site close-out aspects as confirmed by a suitably qualified person and must be provided to the satisfaction of both Waikato Regional Council. The removal of any erosion and sediment control measure from any area where soil has been disturbed as a result of the exercise of this consent must only occur after consultation and written approval has been obtained from the Waikato Regional Council acting in a technical certification capacity. In this respect, the main issues that will be considered by the Waikato Regional Council include:
- a) The quality of the soil stabilisation and/or covering vegetation;
 - b) The quality of the water discharged from the rehabilitated land; and
 - c) The quality of the receiving water.
- 24) The Consent Holder must provide the Waikato Regional Council with a Dust Management Plan (DMP) at least 10 working days prior to the commencement of activities authorised by this consent. The DMP must outline the measures to be adopted by the Consent Holder to ensure that all construction activities and earthworks on the site are carried out in such a manner as to minimise dust emissions and that no discharge of airborne particulate matter that is objectionable to the extent that it causes an adverse effect at or beyond the boundary of the subject property. The DMP must be prepared by a suitably qualified person and developed in general accordance with MfE GPG Dust and incorporate the mitigation measures and recommendations set out in the Air Quality NZ Air Quality Assessment dated 21 May 2025. The DMP must be certified by Waikato Regional Council acting in a technical capacity before the start of construction.
- 25) Should a dust emission occur which is alleged to be objectionable or offensive by the Waikato Regional Council, the Consent Holder must provide a written report to the Councils within five days of being notified of the incident. The report must specify:
- a) The cause or likely cause of the event and any factors that influenced its severity;
 - b) The nature and timing of any measures implemented by the Consent Holder to avoid, remedy or mitigate any adverse effects; and
 - c) The steps to be taken in future to prevent the recurrence of similar events.

Advice Note:

For the purposes of the above condition, an effect that is objectionable or offensive shall be considered to have occurred if any appropriately experienced officer determines so after having regard to:

- The frequency, intensity, duration, location and effect of dust emissions(s); and/or
- Receipt of complaints from neighbours or the public; and/or
- Relevant written advice from an experienced officer of the Waikato Regional Council, Waikato District Council, or the Waikato District Health Board.

Winter Works

- 26) Earthworks must not be conducted during the period 1 May to 30 September inclusive during any year that this consent is current, apart from necessary maintenance works, unless agreed to in writing by the Waikato Regional Council.
- 27) Requests to undertake earthworks during the period 1 May to 30 September inclusive, for any year that this consent is current, must be submitted in writing to the Waikato Regional Council at least five working days prior to the proposed commencement of activities authorised by this consent and by 1 April every year thereafter. The request must be in the form of amendments to the certified E&SCP in accordance with condition 10 of this consent certificate.

Advice Note:

In considering a request for the continuation of winter earthworks, the Waikato Regional Council will consider a number of factors; including:

- The nature of the site and the winter soil disturbance works proposed;
- The quality of the existing/proposed erosion and sediment controls;
- The compliance history of the site/operator;
- Seasonal/local soil and weather conditions;
- Sensitivity of the receiving environment; and
- Any other relevant factor.

Cleanfill

- 28) The nature of the cleanfill material imported and deposited on site must be limited to clean topsoil, clay and rock and must also comply with the definition of “cleanfill” as stated within the Waikato Regional Plan as follows:

“Material that when discharged to the environment will have no adverse effect on people or the environment. This includes natural materials such as clay, soil and rock, and other inert

materials such as concrete and brick, or mixtures of any of the above. Cleanfill excludes for example:

- a) material that has combustible, putrescible or degradable components
- b) materials likely to create leachate by means of biological or chemical breakdown
- c) any products or materials derived from hazardous waste treatment, hazardous waste stabilisation or hazardous waste disposal practices
- d) materials such as medical and veterinary waste, asbestos, or radioactive substances that may present a risk to human health hazardous substances.”
- e) soils or other materials contaminated with hazardous substances or pathogens
- f) hazardous substances

- 29) The Consent Holder must measure the quantity, source and identify and log incoming cleanfill and provide this information upon request from the Waikato Regional Council. For the avoidance of doubt, all cleanfill material deposited at the site must be restricted to material sourced from an agreed local source.
- 30) If required by the Waikato Regional Council in writing, the Consent Holder must undertake soil testing to define the concentrations of contaminants in the cleanfill and overburden imported to the site and, as a consequence, may be required to remove material from the site to an authorised landfill.

Advice Note:

For clarity any material imported onto site must comply with the following parameters:

Trace elements	Acceptance criteria (mg/kg)
Arsenic	17
Boron	15
Cadmium	0,8
Chromium	56
Copper	120
Lead	78
Mercury	1
Nickel	33
Zinc	175
Organic Compounds	Acceptance criteria (mg/kg)

TPH C7-C9	110
TPH C10-C14	58
Benzene	0.11
Ethylbenzene	1.1
Toluene	1.0
Total Xylene	0.61
Benzo[a]pyrene (equivalent)	2
Dieldrin	0.1
Total DDT	0.7

Discharges

- 31) Should monitoring show that suspended sediment levels during construction at the monitoring points, are exceeding the consent limits in condition 16, the Consent Holder must consult the Waikato Regional Council with a view to establishing a flocculation system.
- 32) Prior to the commissioning of the flocculation system, the Consent Holder must provide the Waikato Regional Council with a Flocculation Management Plan, to address the suspended solids at the point of discharge for certification by the Waikato Regional Council acting in a technical capacity. The Flocculation Management Plan must include as a minimum:
 - a) Specific design details of flocculation system;
 - b) Monitoring, maintenance (including post-storm) and contingency programme (including a Record Sheet);
 - c) Details of optimum dosage (including assumptions);
 - d) Details of any initial flocculation trials to be carried out and the results of these trials;
 - e) A spill contingency plan;
- 33) Any subsequent amendments to the Flocculation Management Plan must be provided to and certified by the Waikato Regional Council acting in a technical capacity in writing, prior to implementation.
- 34) The Consent Holder must ensure that the flocculation treatment system is designed and installed by a person/s appropriately qualified and experienced in erosion and sediment management and managed in accordance with the Flocculation Management Plan which

has been certified by the Waikato Regional Council, and Auckland Regional Council's Technical Publication 90 'Flocculation Guidelines, June, 2004'. Page 12 Doc # 30251053

Stabilisation

- 35) All disturbed streambanks that result from the installation of any stormwater outlets must be stabilised immediately by the Consent Holder on completion of the works and suitable erosion protection placed at the outlet to prevent erosion.

Fish Management Protocols

- 36) The Consent Holder must provide the Waikato Regional Council with a Fish Management Plan (FMP) at least 5 working days prior to the proposed commencement of activities authorised by this consent. The objective of the FMP is to outline all fish management procedures to be implemented throughout the works and must include, as a minimum, the following detail:
- 37)
- a) Protocols and methods for the capture and transfer of indigenous fish prior to works commencing, including the timing, extent of fishing effort, and release points;
 - b) Protocols and methods to address discoveries of fish during the works, including recovery techniques to relocate fish to designated release points.
 - c) Protocols and methods for recording and reporting to the Waikato Regional Council, the numbers, diversity and size range of all fish removed (recovered or accidentally injured or killed);
 - d) Requirements for permits and certificates to handle native fish from the relevant authorities;
 - e) Defined roles and responsibilities for all those involved (Consent Holder, contractor, ecologist) and the details of who will be responsible for overseeing the FMP; and
 - f) Notification and reporting procedures relevant to the Waikato Regional Council.
 - g) The FMP must be certified in writing by the Waikato Regional Council acting in a technical certification capacity prior to any works authorised by this consent commencing. The Council's certification will be based on its assessment as to whether the FMP addresses the matters in a) to f) in sufficient detail to achieve the objective. The Consent Holder must undertake all activities authorised by this consent in accordance with the certified FMP.
 - h) The capture and transfer of indigenous fish must be undertaken in accordance with the FMP, with a suitably qualified ecologist present to ensure any remaining fish potentially left stranded by the dewatering activities are captured and relocated.

Fish Recovery and Protection

- 38) Any pumps used during construction activities, including dewatering, must be screened with a mesh aperture size not exceeding 3 millimetres in diameter. If requested by the Waikato Regional Council in writing, the Consent Holder must provide evidence on this aperture size.
- 39) The Consent Holder must ensure that the velocity of water through any intake screen used for dewatering or bypass pumping does not exceed 0.3 metres per second. If requested by the Waikato Regional Council in writing, the Consent Holder must provide information on how this velocity requirement is achieved.

Use of Machinery

- 40) The Consent Holder must ensure that machinery is operated in a manner that minimises vegetation disturbance of existing vegetation cover outside of the immediate work area and the disturbance of sediment in the waterway or loss of sediment to the waterway.

- 41) All earthmoving machinery, pumps, generators and ancillary equipment must be operated in a manner which ensures spillages of fuel, oil and similar contaminants are prevented, particularly during refuelling and machinery servicing and maintenance. Refuelling and lubrication activities must be carried out away from any water body, ephemeral water body, or overland flow path, such that any spillage can be contained so that it does not enter surface water.
- 42) The Consent Holder must ensure that all machinery used in the exercising of this consent is cleaned prior to being transported to/from the site to ensure that all seed and/or plant matter has been removed and documented in accordance with the National Pest Control Agencies A series, best practice (Code A16) guidelines, available to download from “Keep it clean - machinery cleaning guidelines and handbook Waikato Regional Council”.

Wetland Offset Management Plan (WOMP).

- 43) The Consent holder shall, after consulting with Nga Muka Development Trust, provide the Waikato Regional Council with a draft WOMP at least 10 working days prior to the commencement of the proposed activities authorised by this consent. The objective of the WOMP is to offset the effects of the loss of the two wetlands identified on the site by providing a long-term replacement and to enhance wetland values that have been lost.

The WOMP must include, as a minimum, the following detail:

- a) mana whenua input into the location and design of the wetland;
 - b) the final proposed design and location of the wetland;
 - c) the wetland species to be planted;
 - d) specify proposals for maintenance of the wetland, including proposals for replanting if significant plant mortality rates occur;
 - e) the use of locally sourced indigenous species appropriate to the target wetland type;
 - f) identify pest threats and specify control methods;
 - g) Provide a Monitoring Plan.
- 44) The WOMP shall be prepared by a suitably qualified and experienced wetland ecologist;
 - 45) The offset wetland shall be at a minimum ratio of 4:1 for the identified wetland lost and be of a minimum of 200m² in size;
 - 46) The WOMP shall be submitted to and certified by the Waikato Regional Council prior to any loss of the existing wetlands occurring;
 - 47) Construction and planting of the wetland must be completed as part of the earthworks programme for the site.
 - 48) The Monitoring Plan shall:

- a) Describe the wetland values to be monitored, including vegetation composition and cover;
- b) Enable Nga Muka Development Trust input into the design of the monitoring plan;
- c) Require baseline monitoring is undertaken immediately following establishment;
- d) Require annual monitoring for a minimum of five (5) years flowing wetland establishment, unless otherwise agreed in writing by the Waikato Regional Council;
- e) Require the provision of a monitoring report is provided to the Waikato Regional Council within two months of each monitoring event which is to include results of the monitoring and any remedial measures undertaken or proposed.

AUTHORISATION FOR STORMWATER DISCHARGE

- 1) The consent shall commence on the date of decision notification (XXXXX) and will expire in 35 years on XXXXXX.
- 2) The Consent Holder must retain an appropriately qualified and experienced person to complete and finalise the detailed stormwater design. The Consent Holder must submit a stormwater design report that confirms the provision of the stormwater management functions for the various components of the stormwater management system in accordance with Waikato Stormwater Guideline (WRC Technical Report 2020/07). The Consent Holder must not undertake any changes to the stormwater system which would increase the scale or intensity of the actual and potential adverse effects of the stormwater discharge activities authorised by this consent on the environment.
- 3) The Consent Holder must be responsible for the design, structural integrity and maintenance of the stormwater system, and must operate and maintain the stormwater system to avoid, remedy or mitigate any actual or potential adverse effects of the stormwater discharge activities authorised by this resource consent on water.
- 4) The Consent Holder must submit final "as built" details and drawings of the planted stormwater swale and stormwater pond associated with the stormwater network authorised by this resource consent. The "as built" details and drawings must be submitted to the Waikato Regional Council within 1 month of final completion of construction works associated with the stormwater management system. The as built plans must be certified by an appropriately qualified engineer as a true record of the completed stormwater management system and that the completed stormwater management system is in accordance with the detailed design plans approved in accordance with condition 2 above.
- 5) The stormwater design report must outline any design changes that have occurred since the design was consented and include rationale for the changes and must demonstrate that the consented design criteria are still being achieved. The report and plans must be to a standard acceptable to the Waikato Regional Council and must be submitted to the Waikato Regional Council for written approval in a technical certification capacity, prior to construction of the planted swale. Any significant design changes will need consideration of whether they meet this consent or require a change of consent.

Stormwater Operations and Maintenance Plan

- 6) The Consent Holder must manage the stormwater network to avoid the discharge of any substance that is likely to cause the production of conspicuous oil, or grease films, scums or foams, or floatable suspended materials in stormwater receiving water bodies after reasonable mixing. All stormwater catchpits which connect to the stormwater network must, as a minimum, be designed to capture and retain the majority of gross pollutants and floatable contaminants such as oil and grease, unless any discharges of floatable

contaminants to the receiving environment would have no more than minor adverse effects.

- 7) The Consent Holder must manage the stormwater network to avoid the discharge of suspended solids and any other substances that are likely to cause the following effects in stormwater receiving water bodies after reasonable mixing:
 - a) Conspicuous changes in colour or visual clarity;
 - b) Increases in suspended solids concentrations by more than 10 percent;
 - c) 100 grams per cubic metre suspended solids concentrations or greater.

- 8) The Consent Holder must provide the Waikato Regional Council with a finalised 'Stormwater Operation and Maintenance Plan' (SWOMP) for the stormwater management system. The SWOMP must be developed in general accordance with Waikato Regional Council's Stormwater Management Guideline (WRC Technical Report 2020/07) in relation to water quality. The SWOMP must provide for all operational, maintenance, planting and monitoring measures associated with the stormwater discharge activity authorised by this resource consent and the Consent Holder must manage the stormwater network to avoid the following stormwater quantity effects:
 - a) Adverse scour, erosion and sediment deposition on land, property and the beds of stormwater receiving water bodies;
 - b) Adverse flooding of land, property and stormwater receiving water bodies;
 - c) Adverse effects on aquatic ecosystems.

The SWOMP may include, however not be limited to the following:

- a) An outline of the stormwater management system that is in place at the site, and appropriate drawings showing key components of the system and locations;
- b) A programme for regular monitoring and inspection of the stormwater management system, in particular the stormwater management devices and any potential scour and erosion effects downstream of the stormwater outlet structures, including details of monitoring and inspection frequency;
- c) A programme for the regular collection and disposal of debris and sediment collected by the stormwater management devices to ensure that attenuation volumes are not compromised and that appropriate contaminant removal procedures are established;
- d) Procedures for troubleshooting and corrective maintenance;
- e) Inspection checklists for all aspects of the stormwater management system;
- f) Details of who will be responsible for the operation and maintenance works;
- g) Details of recording and reporting of operation and maintenance activities.

The SWOMP must be certified by Waikato Regional Council acting in a technical certification capacity prior to the completion of the stormwater infrastructure and it becoming operational. The Consent Holder must implement the operations, monitoring, and

maintenance activities adopted by the SWOMP.

- 9) The SWOMP is reviewable at any time by the Waikato Regional Council, or at the written request of the Consent Holder, or at any time a significant adverse effect has arisen. Any proposed changes to the SWOMP must be certified by Waikato Regional Council acting in a technical certification capacity.
- 10) The Consent Holder must submit to the Waikato Regional Council ~~in conjunction with the annual report identified by condition XX~~ each year provide summary records of monitoring, inspection and maintenance undertaken in accordance with the SWOMP during the previous 12-month period.
- 11) As soon as practicable after becoming aware of any of the adverse effects of the nature specified in conditions 6 and 7 or monitoring undertaken under the SWOMP outlined in condition 8 that are more than minor, the Consent Holder must submit a report to the Waikato Regional Council in relation to the adverse effects. As a minimum, the report must include:
 - a) A description of the adverse effects;
 - b) A description of the cause of the adverse effects;
 - c) An explanation of any measures taken to remedy or mitigate the adverse effects, the outcome of those measures, and whether further measures are necessary and reasonably practicable;
 - d) If no measures have been taken in accordance with (c), a description of any reasonably practicable measures that could be taken to remedy or mitigate the adverse effects and a recommendation as to whether those measures are necessary.
 - e) Any additional monitoring of the instream environment required as a result of the adverse effects, including the frequency and duration of any monitoring requirements
- 12) The Consent Holder must liaise with the Waikato Regional Council with a view to determining any reasonably practicable measures which should be taken to remedy or mitigate the adverse effects.

Advice Note:

Separate resource consents may be required to undertake remedial or mitigation works. The Consent Holder is advised to obtain all such consents at its sole expense, prior to any works being undertaken.

- 13) All stormwater treatment devices which form part of the stormwater network and are designed to attenuate and/or treat contaminated stormwater must be operated and

maintained by the Consent Holder to provide best practicable stormwater treatment efficiency at all times.

- 14) The Consent Holder must manage the stormwater network to avoid the discharge of hazardous substances in concentrations that are likely to adversely affect aquatic life, or the suitability of water for human consumption after treatment. Where a question arises as to whether the concentration of any particular hazardous substance is causing these effects, it must be determined through the application of the United States Environmental Protection Agency National Recommended Water Quality Criteria (USEPA, 2009) – Criteria Maximum Concentration, or any other technical publication approved in advance by the Waikato Regional Council in a technical certification capacity.
- 15) Prior to the commencement of the earthworks required for construction of the monofill and mill activities authorised by this consent, the Consent Holder must engage a suitably qualified and experienced person(s) to undertake a baseline survey of the water quality and aquatic biota of the Waipapa Stream. The objective of the sampling is to identify the current quality of the stream ahead of the Consent Holder's operations in order to set trigger limits in the receiving environment. The survey undertaken must include the following:
- a) There must be at least 2 sampling sites including one upstream at the southern boundary of the site, and one site downstream to the north of the site, with the location of each as generally being SW2 and SW4 as indicated on the attached Site Monitoring Map Figure PD6 Rev B dated 7.11.2025 Envitech Projects Ltd attached plans. At each of the 2 survey sites, monitoring of the water quality and biota must be undertaken using appropriate and accepted methods and record observations during the sampling period including the presence of any aquatic vegetation and observations of riparian margins and shading
 - b) The water quality sampling must be carried out after a period of stable non-bed moving flows, with six (6) rounds of monitoring occurring over at least a six-month period prior to earthworks commencing on the site.
 - c) Macroinvertebrate sampling must be undertaken prior to works commencing at the upstream and downstream locations referred to in a) above in early Summer (November/December) and late Summer (March), following acceptable methodologies for sampling.
 - d) All water quality sample analyses must be undertaken in accordance with the latest version of the National Environment Monitoring Standards – Water Quality Part 2- Sampling, Measuring, Processing and Archiving of Discrete River Water Quality Data. Sampling must include the following and any other aspects potentially relevant to the monitoring of the ongoing operations for the site.
 - pH
 - Sample temperature
 - Total suspended solids
 - Turbidity
 - Dissolved Organic Carbon
 - Dissolved Boron

- Carbonaceous Biochemical Oxygen Demand cBOD₅
- Chemical Oxygen Demand
- Electrical Conductivity
- Total Hardness
- Total Alkalinity
- Total and dissolved Aluminium
- Total Calcium
- Total Iron
- Total Magnesium
- Total Manganese
- Total Potassium
- Nitrate N
- Total Nitrogen
- Total Sodium
- Heavy metals, totals, trace As, Cd, Cr, Cu, Ni, Pb, Zn
- Heavy metals, dissolved, trace As, Cd, Cr, Cu, Ni, Pb, Zn
- Ethylene glycol
- Total Petroleum Hydrocarbons
- Standard PFAS suite

(e) Water quality analysis of samples must be performed by an IANZ accredited (or similarly qualified alternative) laboratory.

- 16) Following completion of the surveys required by condition 15, the Consent Holder must arrange for the preparation of a report characterising the water quality and ecological values of the Waipapa stream at the two sample points and provide a copy of the report to the Waikato Regional Council. This report must be used to set appropriate trigger levels as required by condition 17 and form the basis of subsequent instream quarterly monitoring as required by condition 18.
- 17) Prior to the commencement of any filling of the monofills and operation of the steel mill, the discharge contaminant criteria and receiving water trigger limits for each of the contaminants listed in Condition 15(d) shall be set out within a Monitoring Plan and provided to the Waikato Regional Council. Operation of the mill and any filling of the monofills must not commence until the Monitoring Plan has been certified by Waikato Regional Council acting in a technical certification capacity.
- 18) Surface water samples must be collected on a quarterly (3 monthly) basis from the upstream and downstream locations within the Waipapa Stream identified [on Site Monitoring Map Drawings – SW2 and SW4 on Fig PD6 prepared by Envitech Projects Ltd dated Rev B 7.11.2025](#) and attached to these consent conditions. Samples must be collected by a suitably qualified and experienced practitioner in accordance with the latest version of the National Environment Monitoring Standards – Water Quality Part 2- Sampling, Measuring, Processing and Archiving of Discrete River Water Quality Data.

~~Water quality analysis of samples must be performed by an IANZ accredited (or similarly qualified alternative) laboratory.~~

- 19) Within ~~5-10~~ working days of the receipt of water sampling results required by condition 17, the Consent Holder must ensure that all results of the analysis are forwarded to Waikato Regional Council.
- 20) If the monitoring required under condition 18 shows non-compliance with the trigger limits established under condition 17, the Consent Holder must ensure that repeat monitoring from the Waipapa stream is undertaken within 10 working days. If water quality is within the trigger limits, continue with the routine compliance monitoring frequency. If repeat monitoring confirms trigger limit exceedance(s) then a review that shall include but not be limited to monofill and mill management, monofill construction and liner integrity, and leachate, sub-soil drainage, stormwater retention pond water and groundwater quality, must be undertaken to determine the cause of this non-compliance and within 3 months report its findings and remediation plans to the Waikato Regional Council.
- 21) The Consent Holder must liaise with the Waikato Regional Council with a view to determining any reasonably practicable measures within 1 month of reporting the findings to the Waikato Regional Council which should be implemented as an agreed framework to remedy or mitigate the adverse effects.
- 22) If, after three (3) years the quarterly monitoring has shown no non-compliance with the trigger levels set, then the applicant may, with the approval of Waikato Regional Council request approval to reduce the suite of parameters monitored and or reduce the frequency of monitoring.

AUTHORISATION FOR AIR DISCHARGES

1) This consent shall commence on the date of decision notification (XXXXX) and will expire in 35 years on XXXXXX.

2) The location, design, implementation and operation of the activity in relation to air discharges must be in general accordance with the substantive application and the Air Quality Assessment prepared by Air Quality Consulting NZ Limited dated May 2025. The air discharges authorised by this resource consent also include discharges from the combustion of landfill gas, CNG and LPG by the Reheating Furnace.

3) There must be no discharge of odour to the extent that is objectionable to the extent that it causes an adverse effect at or beyond the boundary of the subject property.

Advice Note:

For the purposes of this consent, whether an odour is objectionable is determined by having regard to the frequency, intensity, duration, offensiveness and location of the odour and/or any previous validated odour complaints relating to the same site.

4) There must be no discharge of particulate matter or aerosols that cause an objectionable effect at or beyond the boundary of the subject property.

Advice Note:

For the purposes of this consent, whether a discharge of particulate matter is objectionable is determined having regard to the frequency, intensity, duration, nature and location of the particulate matter discharge and/or any previous validated particulate matter complaints relating to the same site.

5) All processes on site must be operated, maintained, supervised, monitored and controlled to ensure that emissions authorised by this consent are maintained at the minimum practicable level.

6) At least 15 working days prior to the operation of the site the Consent Holder must provide to the Waikato Regional Council for certification acting in a technical capacity, an Air Quality Management Plan (AQMP) prepared by a suitably experienced person(s) which considers the emissions from the site in relation to Air Quality. The AQMP must in adequate detail accurately record all monitoring, management and operational procedures, methodologies and contingency plans required to comply with the conditions of this consent. The AQMP must contain, but not be limited to:

- a) A description of the Green Steel Mill facilities and its operation with a focus on site components that are of direct relevance to the discharge to air from the site;

- b) A description of the equipment used to control the discharge of contaminants into the air;
- c) The procedures for the management and maintenance of the emissions control equipment and scrubber associated with the shredding plant: to ensure that all conditions of this consent are complied with and discharges of contaminants to air are minimised;
- d) The procedures for the management of the air discharges and any emission control equipment to ensure compliance with conditions of this consent including regular inspections;
- e) Procedures specific to the Fume Treatment Plant (FTP);
- f) Set control points for differential monitoring for the baghouses and scrubber;
- g) Methods to ensure slag and floc from the steel making process must be contained, managed, and appropriately disposed of to prevent the emission of fugitive dust and particulate matter. An outline of the procedures for storing floc and slag materials for the prevention of fugitive dust when being handled/transported and disposed of must be provided.;
- h) The procedures for emergency response and contingency;
- i) The monitoring, testing and reporting requirements;
- j) Furnace temperature management, strategies for limiting sulphur in raw materials and implementation of advanced control systems;
- k) Management and operational procedures for ensuring equaliser furnace efficiency;
- l) Procedures for responding to any complaints received relating to discharges to air from the site;
- m) Staff training on the process requirements, use of emissions control equipment, and emergency response; and
- n) Any other operation and maintenance procedures to be adopted to ensure that all conditions of this consent are complied with at all times.

The Consent Holder must at all times, operate in accordance with the certified AQMP.

- 7) The Consent Holder must review (and update if necessary) the AQMP at a frequency to reflect actual site management practices but at least once every five years.
- 8) The Consent Holder must provide a copy of any subsequent revisions of or amendments to the AQMP to the Waikato Regional Council Monitoring Team Leader for certification acting in a technical capacity. Subject to any other condition of this consent the AQMP must be implemented, and all activities must be undertaken in accordance with the latest version of

the AQMP submitted to the Council.

- 9) Prior to the construction of the stacks, a suitable survey datum must be established onsite relative to the finished earthworks platform to establish a baseline Relative Level (RL) that will then be used to measure the stack heights required by conditions 10-12. Following the completion of the stacks, and within six months of the consent being exercised suitable evidence (including as built plans), that the stacks comply with the minimum height limits as specified by the conditions, must be provided to the Waikato Regional Council Monitoring Team Leader.
- 10) Air from the Steel Melt Shop must be collected and directed through a baghouse filtration unit before being discharged via a 55 metre high stack, measured relative to the datum established by condition 9 and the discharge shall achieve a minimum design efflux velocity of no less than 20.1 meters per second at full operating load.
- 11) Air from the Rolling Mill must be collected and discharged via a 56 metre high stack measured relative to the datum established by condition 9 and shall achieve a minimum design efflux velocity of no less than 18.3 meters per second at full operating load.
- 12) Air from the shredding plant must be collected and directed through cyclone and scrubber equipment before being discharged via a 10 metre high stack measured relative to the datum established by condition 9.
- 13) The mass discharge of PM₁₀ from the Steel Melt Shop discharge stack must not exceed 14.7 kilograms per hour (kg/hr).
- 14) The mass discharge of PM₁₀ from the Reheating Furnace discharge stack must not exceed 0.34 kilograms per hour (kg/hr).
- 15) When the reheating furnace is operated using landfill gas (LFG) as a fuel source, the concentration of hydrogen sulphide (H₂S) in the LFG supplied to the furnace must not exceed 600 parts per million by volume (ppm v/v). The consent holder must either have a representative sample of the LFG tested or obtain test results from the LFG supplier at least once every year in order to determine compliance with this Condition.

Results of the testing must be forwarded to the Waikato Regional Council within 5 working days of the consent holder having received the results.

Advice Note: This limit applies to the LFG as delivered to the furnace, prior to combustion.
- 16) Sampling ports that comply with AS 4323.1:2021 or an equivalent standard (to be agreed with the Council) must be installed and maintained to enable the testing of emissions from the discharge stacks to be sampled. Safe access for sampling must be provided during emission testing.

- 17) The baghouse filtration unit for the Steel Melt Shop must be fitted with a broken bag detector and a differential pressure monitor. Monitoring of the system during operation must establish the appropriate range for the pressure drop, and alarm set points for abnormal operating conditions, and the response to alarms must be included in the AQMP.
- 18) Emission control and monitoring equipment must be maintained in good working order at least once every year, or as per the manufacturer's recommendations, by a person competent in the maintenance of such systems. Evidence of maintenance documentation must be provided to the Council within 5 working days of any written request.
- 19) The Consent Holder must ensure that the Combustion Plant for the Reheating Furnace is operated and maintained in good operational condition to ensure compliance with the conditions of this consent. This must include maintenance at least annually to prevent poor burner combustion. Records of maintenance and servicing must be made available to the Council upon request.
- 20) To demonstrate compliance with conditions 13-14, the Consent Holder must ensure suitable testing for PM₁₀ is undertaken by a suitably qualified person(s) as outlined in condition 21. The concentration within the stacks must be measured within 6 months of commissioning of each plant and at least annually thereafter unless altered through the certified AQMP required by Condition 6.
- 21) The plant operating conditions during the test period must be recorded with testing to occur during normal operation conditions. The method of sampling and analysis must be in accordance with USEPA Method 201A or an equivalent method approved by Council; The organisation performing the testing must either be currently accredited under ISO 17025 (IANZ accredited) to undertake the method used to perform the testing, or be approved by the Waikato Regional Council Monitoring Team Leader or other authorised officer.

Advice Note: Emission testing should be undertaken under normal operating conditions rather than during cold start-up or shutdown, as electric arc furnace operation is continuous and restarting the furnace involves significant downtime, energy use, and potential impacts on equipment and product quality.

- 22) Each sampling occasion must comprise a minimum of three tests where practicable. In circumstances where an extended testing period is required in order to collect a sufficient quantity of sample to meet the requirements of the approved testing method then the three tests can be substituted with one test as long as the duration is sufficient to meet the requirements of the testing method.
- 23) Any averaged test result that fails to comply with the consent limits must be repeated as soon as practicable and at least within 2 months of the report having been received by the

Consent Holder.

Advice Note:

If further emission retesting cannot be undertaken within the 2 month period for practical reasons (such as shut down of boiler for winter maintenance), the consent holder must notify the Waikato Regional Council with a proposed alternative retest date for written approval by the Waikato Regional Council Monitoring Team Leader or other authorised officer.

- 24) The Consent Holder must forward the results of all emissions testing to the Waikato Regional Council, within one month of the results being received and no later than two months after the testing has been completed, and must be in accordance with the reporting time frames specified by condition 25 when, for example, limits are exceeded.
- 25) The Consent Holder must notify the Waikato Regional Council as soon as practicable, and as a minimum requirement within 48 hours, of the Consent Holder becoming aware of the limits and performance standards specified in this resource consent being exceeded and/or of any accidental discharge, plant breakdown, or other circumstances which are likely to result in the limits and performance standards of this resource consent being exceeded. The Consent Holder must, within 7 days of the incident occurring, provide a written report to the Council, identifying the exceedance, possible causes, steps undertaken to remedy the effects of the incident and measures that will be undertaken to ensure future compliance.

Air Discharge Complaints Monitoring

- 26) The Consent Holder must maintain a log of all complaints (including those received via third parties including the Waikato Regional Council) regarding dust, odour or other contaminants. The Consent Holder must notify the Council of each complaint as soon as practicable. The Consent Holder must record the following details in a complaint log:
 - a) time and type of complaint including details of the incident, e.g. duration, location and any effects noted;
 - b) name, address and contact phone number of the complainant (if provided);
 - c) where practicable, the weather conditions including wind direction at the time of incident;
 - d) the likely cause of the complaint and the response made by the Consent Holder including
 - e) any corrective action undertaken, if applicable;
 - f) future actions proposed as a result of the complaint, if applicable; and the response from the Consent Holder to the complainant.

The complaint log must be made available to the Waikato Regional Council within 24 hours of a written request. and a summary of complaints received must be included in the annual report required by Consent Condition 11 in the GENERAL CONDITONS – SCHEDULE ONE.

- 27) The consent holder must pay the Waikato Regional Council any administrative charge fixed in accordance with section 36 of the Resource Management Act (1991), or any charge prescribed in accordance with regulations made under section 360 of the Resource Management Act (1991).
- 28) The Council may in the three-month period commencing 1 June 2027 and 1 June 2030, then at five yearly intervals thereafter, or in the three-month period after the receipt of the reports in accordance with Conditions 24, 25 and 26 serve notice on the consent holder under section 128 (1) of the Resource Management Act 1991, of its intention to review the Conditions of this resource consent for the following purposes:
 - a) To generally review the effectiveness of the Conditions of this consent in avoiding or mitigating any adverse effects on the environment from the operation and if appropriate to deal with such effects by way of further or amended conditions;
 - b) If necessary and appropriate, to require the holder of the consent to adopt the best practicable option to remove or reduce adverse effects on the surrounding environment; and
 - c) To review the adequacy of and the necessity for monitoring undertaken by the consent holder; and
 - d) Ensure compliance with any change to a contaminant limit in a National Environmental Standard and/or National Policy Statement.

DISCHARGE OF GREENHOUSE GAS TO AIR FROM THE COMBUSTION OF LPG AND CNG

- 1) This consent shall commence on the date of decision notification (XXXXX) and will expire in 20 years on XXXXXX.
- 2) Except as specifically provided for by conditions of this consent, the emission of greenhouse gases to air from the LPG and CNG fired burners must be carried out in general accordance with the information contained in the application for this consent and the Emissions Reduction Plan prepared by Lumen dated 03 April 2025.

Emissions Plan and Best Practicable Option

- 3) The consent holder must operate the site in accordance with the Emissions Plan referenced in Condition 1, or any subsequently approved revised Emissions Plan, and adopt the Best Practicable Options (BPO)/actions as shown in the Transition Pathway provided in the Emissions Plan, with the purpose of minimising greenhouse gas emissions from the site as far as practicable.
- 4) Prior to the site being built the Consent Holder must re-evaluate the best practicable options identified in the Emissions Plan. Two months prior to the site being commissioned the consent holder must provide a report to the Waikato Regional Council (the Council) that summarises the re-evaluation of the best practicable options identified in the Emissions Plan referenced in Condition 3.
- 5) The Consent Holder must ensure that the burners are operated in accordance with the manufacturer's specifications and maintained in accordance with good engineering practices. This must include servicing of the burners at least annually by a person competent in the servicing of such appliances to optimise combustion and performance within its design parameters. Records of burner maintenance and servicing must be made available to the Waikato Regional Council Monitoring Team within 5 working days after a written request.

Greenhouse Gas Emissions Reporting

- 6) Within two years of the site being commissioned, and at two yearly intervals thereafter the Consent Holder must submit a report to the Waikato Regional Council covering the period 1 July to 30 June, for the preceding two years that provides the following:
 - i. An assessment of compliance with the Emissions Plan including progress against the Transition Pathway and implementation of the BPO/actions;
 - ii. Report on annual natural gas usage and quantify greenhouse gas emissions identifying any trends compared to emission targets set in the Emissions Plan;
 - iii. Report on the effectiveness of projects implemented and any proposed actions to further reduce greenhouse emissions if identified under the Emissions Plan;

Within seven years of the site being commissioned, and at six yearly intervals thereafter, the consent holder must submit a report to the Council that:

- iv. Evaluates the technical feasibility and financial viability of lower emissions alternatives including fuel switching opportunities, along with a proposed implementation timeline if applicable; and
 - v. Any proposed revision to the Emissions Plan and implementation of the BPO/actions in order to meet or exceed the greenhouse gas reduction targets and/or to reflect changes in technology and best practices.
- 7) Where Condition 6 v) identifies that the Emissions Plan needs to be updated then a revised Emissions Plan that has been reviewed by a Suitably Qualified Person, who has confirmed the Emissions Plan meets National Environmental Standard for Industrial Greenhouse Gases (NES-IGHG) Regulation 15 (or any equivalent replacement), must be submitted to the Council before 28 February of the following year. The revised Emissions Plan shall be approved by the Council in a technical certification capacity and will be limited to the Council's assessment of whether the matters required to be included in an Emissions Plan under NES-IGHG regulation 15 continue to be adequately addressed. The revised Emissions Plan must equal or further reduce greenhouse gases discharged when compared to what was proposed in the application and within a comparable timeframe.

Advice Note:

Guidance for the definition of an SQP is provided in the National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat (NES-IGHG), Regulation 14.

- 8) The consent holder must pay the Waikato Regional Council any administrative charge fixed in accordance with section 36 of the Resource Management Act (1991), or any charge prescribed in accordance with regulations made under section 360 of the Resource Management Act (1991).
- 9) The Council may in the 3 months 1 June 2029 and 1 June 2032, then at three yearly intervals thereafter, and annually thereafter and/or within 3 months of receiving a Report as outlined in Conditions 6 or 7 serve notice on the consent holder under s 128(1) of the Resource Management Act 1991, of its intention to review the conditions of this resource consent for the following purposes:
- a) If necessary and appropriate, to require the holder of this resource consent to adopt best practicable options to remove or reduce adverse effects on the receiving air environment associated with greenhouse gas emissions; and
 - b) Take into account any regulation, National Policy Statement, regional policy statement or relevant regional plan that relates to greenhouse gas emissions authorised by this consent.

AUTHORISATION FOR GROUNDWATER TAKING

- 1) The consent shall commence on the date of decision notification (XXXXX) and will expire in 35 years on XXXXXX.
- 2) Groundwater taken pursuant to this consent must only be used in conjunction with the operation of the activities on the site.
- 3) Groundwater must only be taken via one or more production bores to be constructed within the land legally described as:
 - Part Lot 1 DPS 45893, Record of Title SA40B/472;
 - Lot 2 DP 310030, Record of Title 39530;
 - Lot 3 DP 310030, Record of Title 39531;
 - Lot 4 DP 310030, Record of Title 39532;
 - Lot 5 DP 310030, Record of Title 39533.
- 4) Prior to physically taking groundwater pursuant to this consent for the first time, the Consent Holder must write to Waikato Regional Council and propose the maximum:
 - daily net take volume; and
 - annual, for the year ending 30 June, net take volume;to be taken pursuant to this consent.
- 5) The proposed maximum net take volumes must:
 - a) not exceed 1,000 cubic metres on a daily basis;
 - b) not exceed, on an annual basis for the year ending 30 June, the product of the proposed maximum daily net take volume and 365;
 - c) be based on the results of a properly designed and executed aquifer pumping test;
 - d) be demonstrated to be sustainable and technically justified through hydrogeological analysis by a suitably qualified and experienced hydrogeologist.
- 6) Prior to physically taking groundwater pursuant to this consent for the first time, the Consent Holder must submit a report to Waikato Regional Council that must demonstrate that:
 - a) Any production bore to be used to take groundwater has been constructed in accordance with any applicable standards and any relevant bore construction consent.
 - b) The Consent Holder consulted with Waikato Regional Council prior to undertaking any aquifer pumping test to confirm that the Consent Holder's proposed aquifer pumping test design, duration and methodology were accepted by Waikato Regional Council as fit for purpose in terms of the proposed maximum net take volumes.

- c) Any aquifer pumping test was undertaken by a suitably qualified and experienced hydrogeologist in accordance with design, duration and methodology accepted by Waikato Regional Council.
 - d) The results of any aquifer pumping test were used in hydrogeological analysis by a suitably qualified and experienced hydrogeologist to assess:
 - a. aquifer characteristics;
 - b. interference effects on any bore within the radius of influence;
 - c. stream depletion effects on nearby surface water bodies;
 - d. sustainability of the proposed maximum net take volumes in terms of aquifer yield, including the ability of the aquifer to support the take over time without causing long-term decline in groundwater levels or other adverse environmental effects.
 - e) The hydrogeological analysis demonstrated – in the opinion of Waikato Regional Council – that the proposed maximum net take volumes will likely not result in minor or more than minor adverse effects on any person because of interference effects on any bore within the radius of influence; or if it is instead the case that the hydrogeological analysis demonstrated – in the opinion of Waikato Regional Council – that the proposed maximum net take volumes will likely result in minor or more than minor adverse effects on any person because of interference effects on any bore within the radius of influence, the Consent Holder has obtained written agreement from any such person confirming any such person’s acceptance of the adverse effects and a copy of any written agreement in this regard has been submitted to Waikato Regional Council by the Consent Holder.
 - f) The hydrogeological analysis demonstrated – in the opinion of Waikato Regional Council – that the proposed maximum net take volumes will not result in more than minor adverse effects on any nearby surface water body because of stream depletion.
- 7) Groundwater must not be physically taken pursuant to this consent until Waikato Regional Council has both:
- a) reviewed the report prepared by the Consent Holder and submitted to Waikato Regional Council in accordance with condition 5; and
 - b) confirmed in writing that Waikato Regional Council – acting in a technical certification capacity based on Waikato Regional Council’s assessment as to whether all of the matters set out in condition 5 have been addressed and met – has certified the maximum net take volumes proposed by the Consent Holder.
- 8) If Waikato Regional Council confirms in writing that Waikato Regional Council has certified the maximum net take volumes proposed by the applicant, no more than the certified maximum net take volumes are authorised to be taken pursuant to this consent.
- ~~9) Within one month of the granting of the consent, the consent holder must implement a virtual water take measurement, recording and reporting system (“virtual system”). The virtual system must:~~

- a) ~~generate 96 virtual measurement values per day representing 96 15-minute periods; and~~
 - b) ~~record a net take volume of zero cubic metres on a continuous basis in units of cubic metres for each 15-minute period; and~~
 - c) ~~be automated and auditable; and~~
 - d) ~~be capable of electronic daily reporting to Waikato Regional Council in accordance with Waikato Regional Council data standards and protocols; and~~
 - e) ~~continuously operate upon and from its implementation date; and~~
 - f) ~~cease operating upon and from the implementation date of the physical system required by condition 9.~~
- 10) Prior to physically taking groundwater pursuant to this consent for the first time, the Consent Holder must implement a physical water take measurement, recording and reporting system (“physical system”). The physical system must:
- a) measure and record the net take volume on a continuous basis in units of cubic metres for each 15-minute period; and
 - b) have a minimum accuracy of +/- 5 percent; and
 - c) be sealed and tamper-proof; and
 - d) be capable of electronic daily reporting to Waikato Regional Council in accordance with Waikato Regional Council data standards and protocols; and
 - e) continuously operate upon and from its implementation date.
- 11) ~~The consent holder must ensure that the virtual system is verified as accurate by a suitably qualified person before the next 30 June following the granting of this consent, unless the physical system has been implemented and is operating, in which case virtual system verification is not required.~~
- 12) ~~The consent holder must ensure that the virtual system is verified as accurate by a suitably qualified person at a frequency of no less than five yearly from the date of the first verification required by condition 10, unless the physical system has been implemented and is operating, in which case virtual system verification is not required.~~
- 13) The consent holder must ensure that the physical system is verified as accurate by a suitably qualified person:
- a) within one month of groundwater physically being taken pursuant to this consent for the first time; and
 - b) at a frequency of no less than five yearly from the date of the first verification required by condition 12(1).
- 14) The Waikato Regional Council may at any time request the consent holder to engage a suitably qualified person to undertake verification of the ~~virtual system or~~ physical system, and the consent holder must comply with any such request within the timeframe specified by Waikato Regional Council in the request.

- 15) The consent holder must submit to Waikato Regional Council evidence of any verification – including the name and qualifications of the verifier and the results of the verification – within one month of any verification being completed.
- 16) ~~Upon and from the date of virtual system implementation and continuing upon and a~~After the date of physical system implementation, the consent holder must report – via a telemetry system compatible with Waikato Regional Council data standards and protocols – continuous values of recorded net take volume ~~–from either the virtual system or the physical system, as the case may be–~~ in each 15-minute period. These data in units of cubic metres must be reported once daily to Waikato Regional Council via the telemetry system and:
a) there must be 96 values per daily report; and
b) when no water is being taken the data must specify the net take volume as zero.
- 17) At any time during July through September inclusive, Waikato Regional Council may, following service of notice on the Consent Holder, commence a review of the conditions of this consent pursuant to section 128(1) of the Resource Management Act 1991 for the following purposes:
a) to review the effectiveness of the conditions of this consent in avoiding or mitigating any adverse effects on any water body or any person from the exercise of this consent and if necessary to avoid, remedy or mitigate such effects by way of further or amended conditions;
b) to review the adequacy of and the necessity for monitoring undertaken by the Consent Holder;
c) to review the appropriateness of any volume specified within this consent and, if necessary, to address any inappropriateness of any volume by way of reducing any volume;
d) to review the consistency of the conditions of this consent with the vision and strategy set out in Schedule 2 of the Waikato-Tainui Raupatu Claims (Waikato River) Settlement Act 2010 and any subsequent changes thereof; and if necessary to address any inconsistency of the conditions of this consent with the vision and strategy by way of further or amended conditions.
- 18) At any time during the periods 1 July 2036 through 30 June 2037 and 1 July 2051 through 30 June 2052 WRC may, following service of notice on the Consent Holder, commence a review of the conditions of this consent pursuant to section 128(1) of the Resource Management Act 1991 to take account of any change to the Waikato Regional Plan (WRP) being proposed as a result of any catchment investigation undertaken by Waikato Regional Council in terms of WRP 3.3.4.9 Review Allocable Flows/Sustainable Yields and WRP Table 3-4A Catchment Investigation Dates for Waikato River (4) Ngāruawāhia at confluence of Waipa (excluding the Waipa River) to Mercer Bridge.
- 19) The Consent Holder must pay to WRC any administrative charge fixed in accordance with section 36 of the Resource Management Act 1991, or any charge prescribed in accordance with regulations made under section 360 of the Resource Management Act.

Advice Note:

~~The virtual system is required to ensure compliance with the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 during the period between the granting of consent and the commencement of taking water. During this period, physical system infrastructure may not yet be installed, but the regulations require continuous daily reporting of water take volumes, including zero values. The virtual system provides a structured, automated, and auditable method for recording factual virtually measured zero volumes in 15-minute intervals, ensuring that reporting obligations are met in a manner consistent with the requirements of the regulations until the physical system infrastructure is in place.~~

AUTHORISATION FOR WASTEWATER DISCHARGE

- 1) This consent shall commence on the date of decision notification (XXXXX) and will expire in 35 years on XXXXXX.
- 2) An onsite wastewater disposal system must be provided for the site by the Consent Holder in accordance with the Ormiston Domestic On-Site Wastewater Treatment & Land Disposal Assessment dated May 2025 and achieve compliance with the conditions as set out below.
- 3) The maximum volume of treated wastewater discharged on-site must not exceed 10,000 litres per day (10.0 cubic metres per day) as measured over any 24-hour period.
- 4) The key components of the wastewater treatment and land disposal system must be consistent with those described in the application and must comprise at least the following minimum, or additional, components, dimensions and standards:

Innoflow Technologies AX200 +AX40 two-stage recirculating textile packed bed reactor (rtPBR) system. The proposed wastewater treatment system comprises the following

components:

Grease Trap

- 1 x 6,000 litre triple chamber grease trap is proposed to be installed at the staff kitchen.

Primary Treatment

- Septic Tank 1 x 25,000 litres (25m³)

Main Treatment System

- Pre-Anoxic Tank 1 x 25,000 litres (25m³)
- Recirculation Tank 1 x 10,000 litres (10m³)
- Advantex Textile Filters 2 x AX100 Pods (20m³)
- Recirculation Tank 1 x 10,000 litres (10m³)
- Advantex Textile Filters 2 x AX20 Pods (2.0m³)
- Treated Effluent Tank 1 x 10,000 litres (10m³)
- System Monitoring: Discharge Water Meter with Remote Monitoring Panel & Data Logger
- Treated effluent quality is to meet the following standards:
 - BOD₅ = <20 mg/L
 - Total Suspended Solids = < 30 mg/L

- 5) The Consent Holder must ensure that the quality of the treated effluent discharged to the ground complies with the following limits:
- a) The concentration of five-day Biochemical Oxygen Demand must not exceed 20 milligrams per litre (20mg/l BOD₅),
 - b) The concentration of Total Suspended Solids must not exceed 30 milligrams per litre (30mg/l TSS).

Advice Note:

All quality analyses must be undertaken by an IANZ-accredited or equivalent laboratory. All methods used must be appropriate for the analyses undertaken.

- 6) Treated effluent must be discharged into the ground via subsurface pressure compensating dripper irrigation at an area loading rate that does not exceed 3 millimetres per day (i.e. 3.0 litres per square metre) or the absorptive capacity of the soils, whichever is the lesser. The discharges must be uniformly distributed over the disposal system.
- 7) The Consent Holder must ensure that a reserve wastewater disposal area of not less than one hundred percent (100%) of the duty disposal area is available at all times. To this end, the Consent Holder must ensure that no permanent hard surface (for example, concrete) is placed over the reserve disposal area for the duration of this consent.

- 8) The Consent Holder must ensure that there is a minimum vertical separation distance of at least 600 millimetres of unsaturated soil between the base of any disposal system and the groundwater table at all reasonable times. The term “at all reasonable times” implies that the specified vertical distance is maintained during the wettest months of the year immediately following a typical short-duration rainfall event (e.g. a 6-month return period event).
- 9) There must be no breakout (uncontrolled discharge) of wastewater onto the ground surface from any part of the wastewater treatment system or the disposal area that results in visible ponding of the wastewater on the ground surface and/or an overland discharge of wastewater.
- 10) Surface stormwater and stormwater runoff must be directed away from the wastewater treatment system and disposal area, as extensively as practicable. The treatment system must be maintained in as watertight a condition as practicable to prevent the ingress of stormwater or groundwater into the system.
- 11) The Consent Holder must ensure that there is no activity undertaken on top of the disposal area that may cause damage to the disposal system (e.g. stock grazing, deep-rooting trees or car parking, etc.).
- 12) The Consent Holder must ensure that the wastewater disposal area is fenced. The Consent Holder must maintain signs at the disposal area which include the words ‘warning-health risk’, along with ‘sewage treatment area’.
- 13) The Consent Holder must maintain a sign at the entrance to the Wastewater Treatment Plant which provides the appropriate contact telephone numbers in the event of an emergency, complaint or enquiry. The sign must also include the words ‘warning-health risk’, along with ‘sewage treatment area’.
- 14) Within one month of the completion of the installation of the new wastewater treatment system and the new disposal system, the Consent Holder must submit to the Waikato Regional Council the following:
 - a) An ‘as-built’ plan of the treatment and disposal system; and
 - b) Verification from the installer of the system that it has been installed in accordance with the information submitted in support of the application and best practice.
- 15) Within one month of commissioning of the new wastewater treatment system, the Consent Holder must provide to Waikato Regional Council evidence that a maintenance contract or maintenance programme for the system exists, and which is to be applied for the duration of the consent.
- 16) Within 12 months of the commencement of operations on the site, the Consent Holder must provide a Wastewater Management Plan for the site to manage any discharges from the

wastewater system and confirm its operational aspects, which has been prepared by a suitably qualified person(s) to Waikato Regional Council for certification acting in a technical capacity. The wastewater Management Plan must address the following matters as a minimum:

- a) An inspection programme designed to verify the correct functioning of all components of the wastewater treatment system; and
- b) A schedule or checklist of maintenance requirements for all reticulation, pump chambers and the wastewater treatment and disposal system. The maintenance requirements must also specify that the systems must be maintained on a minimum six-monthly frequency; and
- c) A copy of the names of the appropriate contact people in the event of system malfunction, including contact telephone numbers; and,
- d) Monitoring and reporting requirements, and
- e) A contingency plan for action to be taken in the event of wastewater breakout from the treatment system and/or disposal areas.

Any notification of any changes made to it must be provided to the Waikato Regional Council for certification acting in a technical capacity.

- 17) The wastewater scheme must be operated, maintained and managed by appropriately experienced personnel in accordance with the Wastewater Management Plan provided by condition 16 of this consent.
- 18) The discharge must not result in any objectionable effects from odour beyond the boundary of the subject property.
- 19) If an emission of odour occurs that has an objectionable or offensive effect, the Consent Holder must provide a written report to the Waikato Regional Council within five days of being notified of such by the Waikato Regional Council. The report must specify:
 - a) the cause or likely cause of the event and any factors that influenced its severity;
 - b) the nature and timing of any measures implemented by the Consent Holder to avoid, remedy or mitigate any adverse effects; and
 - c) the steps to be taken in future to prevent the recurrence of similar events.

Advice Note:

For the purpose of this resource consent, the Waikato Regional Council will consider an odour effect that is objectionable or offensive to have occurred if any appropriately experienced officer of the Waikato Regional Council deems it so after having regard to:

- a) the frequency, intensity, duration, offensiveness and location of the odour; and/or
- b) receipt of complaints from neighbours or the public;
- c) or relevant written advice or a report from an Environmental Health Officer of a territorial authority or health authority.

- 20) The Consent Holder must ensure that a flow meter is available to record the quantity of wastewater discharged from the wastewater treatment system on a cumulative daily basis. The meter must have a reliable calibration to flow, which must be maintained to an accuracy of +/- 5%. The total flow discharged every day must be recorded. Access to the meter must be available to Waikato Regional Council staff at all reasonable times.

- 21) The Consent Holder must sample the treated effluent every six months within the months of November and May. This sample must be analysed for the following parameters:
 - a) Biochemical Oxygen Demand (BOD5); and
 - b) Total Suspended Solids (TSS)

AUTHORISATION FOR MONOFILL ACTIVITIES

- 1) The Consent Holder must limit the materials placed within the monofill sites to ‘Floc’ as described by the Monofill Monitoring Plan and Evaluation of Surface and Groundwater Effects dated 9 June 2025, and the Green Steel Monofill Management Plan dated 30 May 2025, prepared by Earthtech Consulting Limited.
- 2) The consent holder must provide the Waikato Regional Council with a draft “Liner and Drainage Installation Quality Control Plan” at least three months prior to the construction of the monofill Class 1 liner and drainage systems for peer review by an independent reviewer who is a suitably qualified and experienced practitioner.
- 3) The “Liner and Drainage Installation Quality Control Plan” shall set out how the Consent Holder will verify that the constructed Class 1 lining system and drainage system meets the specified requirements. It shall also set out the reporting requirements at the various stages of construction including the reporting of results of pinhole and welding testing.
- 4) The “Liner and Drainage Installation Quality Control Plan” must be certified in writing by the Waikato Regional Council acting in a technical certification capacity prior to any works authorised by this consent commencing and the Consent Holder must undertake all liner and drainage construction authorised by this consent in accordance with the certified “Liner and Drainage Installation Quality Control Plan”.
- 5) The Consent Holder must ensure that leachate capture for the northeast and southwest monofill sites is maintained on an ongoing basis and that any leachate is temporarily stored in tanks and then transported off-site by tanker truck for treatment.

Advice Note:

Further treatment of the leachate onsite may require further consents to be obtained.

- 6) In order to reduce the volume of leachate produced, the Consent Holder must provide suitable written confirmation of design aspects as identified by the Earthtech Monofill monitoring Plan and Evaluation of Surface and Groundwater Effects dated 30 May 2025 has been appropriately implemented to limit rainfall or stormwater ingress into the two monofill sites for certification by Waikato Regional Council acting in a technical capacity.
- 7) Prior to the commencement of the construction of either monofill, the Monofill Management Plan shall be amended to include the following:
 - a) A requirement that the liner and leachate collection system shall be designed to control the leachate head above the liner to no more than 0.3m;
 - b) Any short-term emergency storage situation such as after an extreme rainfall event (150mm or greater over 24 hours) shall ensure that leachate does not exceed 0.3m

- for more than a 2-week period;
- c) Slope stability modelling and analysis for the monofills shall be undertaken for sensitivity with a 3m leachate level above the liner;
 - d) Any exceedances of the 0.3m level in an extreme event shall be reported to Waikato Regional Council, including measures that will be implemented to reduce the exceedance and measures to avoid any reoccurrence.
- 8) Prior to the commencement of the construction of each monofill, the consent holder shall provide to Waikato Regional Council for written certification, detailed design information setting out:
- a) The depth of the unsaturated zone upon which the monofill will be placed;
 - b) Whether a single or double composite liner will be needed, based on an assessment using NEMP 3.0;
 - c) A monitoring programme of the floc, based on NEMP 3.0 (or subsequent equivalent) methodology on an ongoing 6-month basis to determine levels of PFAS in the leachate;
 - d) How monofill slope and liner stability will be achieved, and details of earthworks for each monofill, including location of stockpiles;
- 9) The Consent Holder must ensure that monofill sites are appropriately managed to avoid the discharge of airborne particulate matter that is objectionable to the extent that it causes an adverse effect at or beyond the boundary of the site. Such measures shall incorporate:
- a) Waste floc transported from the processing plant will be delivered to the monofill in a damp state to minimise dust emissions;
 - b) Material placed in the monofill will be compacted immediately, reducing the potential for airborne dispersion;
 - c) If necessary, additional water will be applied to the material within the monofill to prevent it from drying out;
 - d) Additional mitigation measures, such as misting cannons and temporary screens, will be implemented as required to further control dust emissions;
 - e) At the end of each day, waste floc will be covered with either soil or tarpaulins to prevent dust emissions overnight;
 - f) If intermediate cover remains undisturbed for more than three months, or once final cover is placed, it will be vegetated or covered with hydroseed or mulch as soon as practicable.
 - g) Dust suppression of access roads to the disposal area, typically by water tanker, is also to be carried out regularly.
- 10) No later than 12 months prior to the closure of each monofill, the Consent Holder must submit to the Waikato Regional Council, for certification acting in a technical certification capacity, a Monofill Closeout and Rehabilitation Management Plan “MCRMP” for the Southwest and Northeast Monofills.

The MCRMP shall include, but not be limited to, the following matters:

- (a) Identification of the expected final (future) landform once fill operations have ceased and each fill area has been capped;
- (b) An implementation strategy that clearly identifies the timing of all rehabilitation and restoration works within the filling stage areas including:
 - (i) identification and timing of progressive and closure rehabilitation works;
 - (ii) on-going management strategy for weed and pest control; and
 - (iii) procedures to be adopted in the handling and storage of topsoil, subsoil and overburden materials to ensure their continued viability for establishing pasture (or other identified vegetation cover).
- (c) The design, construction procedures and stability of the final landform, including the maintenance of flows to the downstream receiving environments;
- (d) Measures to avoid the over compaction of soils;
- (e) Stormwater drainage/soakage of the final landform;
- (f) Ecological enhancements;
- (g) Reporting and review outcomes;
- (h) The achievement of the minimum fill site cover and capping requirements;
- (i) As-builts for subsoil drainage; and
- (j) Any ongoing monitoring following site closure.

The Consent Holder shall undertake the mitigation and rehabilitation of the filling area in accordance with approved MCRMP and under the supervision of persons with appropriate restoration and rehabilitation experience.

The Consent Holder shall review and update the MCRMP every 3 years and within 6 months of any decision to cease filling operations at the site. Any changes (excluding changes to contact person and contact details etc.) to the MCRMP must only be made with the written approval of the Waikato Regional Council.

- 11) At least 10 working days prior to the commencement of disposal activities at the monofills, the Consent Holder shall prepare and submit to the Waikato Regional Council a Fire Management Plan (FMP). The FMP and any update shall be prepared by a suitably qualified and experienced person and certified by Fire and Emergency New Zealand (FENZ), or prepared in consultation with FENZ, to the satisfaction of the Waikato Regional Council.
- 12) The FMP shall demonstrate how the risks of fire associated with the construction, operation, and closure of the monofills will be avoided, remedied, or mitigated, and how fire events will be safely and effectively managed should they occur.
- 13) The FMP shall include, but not be limited to:

- a) Identification of potential fire risks;
- b) Procedures for screening, handling, storage, and placement of floc to minimise fire risk;
- c) A maximum of 200m² of uncovered floc at any one time, and setbacks from any vegetation surrounding the monofills;
- d) Limits on the size, height, and duration of waste floc stockpiles;
- e) On-site fire prevention measures, including water supply, fire-fighting equipment, ready availability of soil over materials to act as a fire suppressant;
- f) A requirement for floc waste to be covered at the end of each operational day by a minimum of 100mm non-combustible material, or such alternative cover as certified by Waikato Regional Council;
- g) Procedures for monitoring for heat, smoke, or other indicators of fire;
- h) Emergency response procedures, including notification protocols, and coordination with Fire and Emergency New Zealand;
- i) Training requirements for staff and contractors, including induction and refresher training;
- j) A site plan showing fire access routes, fire-fighting water supplies;

14) The Consent Holder shall implement the Fire Management Plan at all times during construction, operation, temporary closure, and permanent closure of the monofills.

15) The Fire Management Plan shall be reviewed:

- a) At least every five years;
- b) Following any fire incident; and
- c) When there is a material change to the site layout, or operational practices that may affect fire risk.

Any revised Fire Management Plan shall be provided to the Waikato Regional Council prior to implementation of the changes

A copy of the current Fire Management Plan shall be kept on-site at all times and made available to the Waikato Regional Council or Fire and Emergency New Zealand upon request.

16) The Consent Holder shall ensure that the industrial monofill is operated at all times by suitably trained, experienced, and competent personnel with sufficient knowledge and capability to operate the monofill in accordance with: a. the conditions of this approval; b. the approved operational and management plans; and c. recognised best practice for the safe operation of industrial monofills.

17) All operational staff and contractors involved in monofill activities shall receive an appropriate site-specific induction and ongoing training relevant to their roles, including waste acceptance procedures, environmental controls, health and safety requirements, and emergency response procedures.

- 18) The Consent Holder shall maintain records of staff training, qualifications, and relevant experience, which shall be made available to the Consent Authority upon request.

~~The Consent holder shall, to the satisfaction of Waikato Regional Council, provide suitable evidence of appropriate onsite provisions relevant to the ongoing management of the monofill areas and their ability to respond appropriately in the event of a fire, including the ready availability of soil cover materials to act as a fire suppressant.~~

- 19) The Consent Holder must implement a monitoring programme of the ~~stormwater associated with operation of the steel mill and shredding operation and the stormwater~~ and the sub-soil drainage water diverted from each monofill as well as collected leachate when they become operational. The objective of this monitoring programme is to determine if any leachate contaminants are being discharged from the monofill ~~and mill~~ operation into surrounding water bodies. The sampling locations for each monofill and the steel mill site are to be as set out on the attached Site Monitoring Map Drawings – SW1 and SW3 (stormwater) and SS1 and SS2 ((subsurface water) on Fig PD6 prepared by Envitech Projects Ltd dated Rev B 7.11.2025. The parameters required to be assessed are as set out in the following table:

- pH
- Sample temperature
- Total suspended solids
- Turbidity
- Dissolved Organic Carbon
- Dissolved Boron
- Carbonaceous Biochemical Oxygen Demand cBOD₅
- Chemical Oxygen Demand
- Electrical Conductivity
- Total Hardness
- Total Alkalinity
- Total and dissolved Aluminium
- Heavy metals, totals, trace As, Cd, Cr, Cu, Ni, Pb, Zn
- Heavy metals, dissolved, trace As, Cd, Cr, Cu, Ni, Pb, Zn
- Ethylene glycol
- Standard PFAS suite
- Total Petroleum hydrocarbons

Advice note:

Please see Stormwater Discharge Authorisation condition 15 requiring baseline water quality and aquatic biota monitoring of the Waipapa Stream, the receiving environment for all stormwater discharging off the site.

- 20) Prior to the commencement of any filling of the monofills, the monitoring programme required under condition 17 must be set out within a Monitoring Plan and provided to the Waikato Regional Council. The Monitoring Plan must include details of all monitoring locations and trigger limits associated with the groundwater, stormwater, sub-soil~~surface~~ drainage and leachate monitoring for the monofill and steel mill operation. ~~Operation of~~

the mill and filling of the monofills must not commence until the Monitoring Plan has been certified by Waikato Regional Council acting in a technical certification capacity.

Advice note:

The subsoil drains ensure that the liner subgrade is fully drained, and they also act as an early warning leak-detection system. The drains discharge by gravity to a monitoring manhole located near the low point of the monofill floor.

- 21) Sampling of stormwater, sub-surface drainage and leachate from all sampling locations identified in [Fig PD6 \(prepared by Envitech Projects Ltd dated Rev B 7.11.2025\)](#) must be undertaken on at least a six-monthly basis.
- 22) Samples must be collected by a suitably qualified and experienced practitioner.
- 23) Water quality analysis of samples must be performed by an IANZ accredited (or similarly qualified alternative) laboratory.
- 24) Within 5-10 working days of the receipt of water sampling results, the Consent Holder must ensure that all results of the analysis are forwarded to Waikato Regional Council.
- 25) The following discharge limits must be applied to all stormwater and sub-soil drainage discharges from site:

Parameters	Trigger Limits (ug/L)
pH	6.5 to 9.0
Total suspended solids	100 g/m ³
Dissolved aluminium	150
Dissolved arsenic	140
Dissolved boron	2500
Dissolved cadmium	0.8
Dissolved chromium	40
Dissolved copper	2.5
Dissolved lead	9.4
Dissolved nickel	17

Dissolved zinc	31
Ethylene glycol	330
PFOS	0.13
PFOA	220
TPH	15 mg/L
cBOD ₅	4 g/m ³

1. Dissolved metals based on 80% species protection DGV (ANZG 2018).
2. Ethylene glycol based on unknown species protection (ANZG 2000).
3. PFOS and PFOA based on 95% species protection (PFAS NEMP 3.0).
4. TPH based on avoidance of visible sheens MfE (1989) Petroleum Guidelines.

Advice note:

The other parameters required for analysis under Condition 17 are helpful for determining toxicity modifiers so would be useful to include for additional supporting evidence of effects in the event of exceedances of the above trigger limits.

- 26) If the monitoring required under condition 17 shows non-compliance with the trigger limits specified under condition 23, the Consent Holder must ensure that repeat monitoring is undertaken within 10 working days. If water quality is within the trigger limits, continue with the routine compliance monitoring frequency. If repeat monitoring confirms trigger limit exceedance(s) then a review that shall include but not be limited to monofill and mill management, monofill construction and liner integrity and groundwater and leachate quality must be undertaken to determine the cause of this non-compliance and within 3 months report its findings and remediation plans to the Waikato Regional Council.
- 27) The Consent Holder must liaise with the Waikato Regional Council with a view to determining any reasonably practicable measures within 1 month of reporting the findings to the Waikato Regional Council which should be implemented as an agreed framework to remedy or mitigate the adverse effects.
- 28) The Consent Holder must engage a suitably qualified and experienced practitioner to collect groundwater samples on a six-monthly basis from the groundwater monitoring bores MBA, MBB and MBC for the southwestern monofill and groundwater bores (yet to be specified) for the northeastern monofill. Analysis of groundwater samples shall be performed by an IANZ accredited (or similarly qualified alternative) laboratory for the following parameters:

Parameters	Trigger Value¹
pH	
Electrical conductivity	
Dissolved arsenic	0.14
Dissolved boron	2.5
Dissolved cadmium	0.0008
Dissolved chromium	0.04
Dissolved copper	0.0025
Dissolved lead	0.0094
Dissolved manganese	3.6
Dissolved mercury	0.0054
Dissolved nickel	0.017
Dissolved zinc	0.031
PFAS (standard lab analysis suite)	Above trace level detection limit

1. Dissolved metals (mg/L) - Australian and New Zealand Freshwater default guideline value (ANZG (2018) DGV) for 80% Species Protection

Notes

- The water level (static water level) will be measured from the top of the casing before each sampling occasion.
- Samples will be collected with disposable groundwater bailers and placed in laboratory-supplied containers.
- Before sampling, a minimum of three casing volumes of water will be removed from the borehole. Alternatively, temperature, conductivity (EC) and pH measurements will be monitored, and sampling undertaken once these parameters have stabilised.
- Samples to be analysed for dissolved constituents will be field-filtered whenever practicable.
- Chain-of-custody documentation must be completed for all samples.
- Samples must be kept on ice (cooler bins) and dispatched to the laboratory within one day of collection.

- All sample analyses will be undertaken in accordance with “Standard Methods for the Examination of Water and Wastewater, APHA 2012.
- 29) Within 5 working days of the receipt of ground water sampling results, the Consent Holder shall ensure that all results of the analysis are forwarded to Waikato Regional Council.
- 30) If the monitoring required under condition 23 shows non-compliance with the specified groundwater trigger limits, the Consent Holder must ensure that repeat monitoring is undertaken within 10 working days. If groundwater quality is within the trigger limits, continue with the routine compliance monitoring frequency. If repeat monitoring confirms trigger limit exceedance(s) then a review that shall include but not be limited to monofill and mill management, monofill construction and liner integrity and sub-soil drainage, stormwater retention pond water and leachate quality must be undertaken to determine the cause of this non-compliance and within 3 months report its findings and remediation plans to the Waikato Regional Council.
- 31) The Consent Holder must liaise with the Waikato Regional Council with a view to determining any reasonably practicable measures within 1 month of reporting the findings to the Waikato Regional Council which should be implemented as an agreed framework to remedy or mitigate the adverse effects.
- 32) Prior to commencement of the construction of each monofill, the consent holder shall provide to Waikato Regional Council for written certification, a gas monitoring programme which includes standards to be achieved. The objective of this programme is to determine if any gas is being emitted from the monofills and if any adverse effects are resulting. The programme shall commence once more than 5,000m³ of floc has been deposited on each site. The parameters to be assessed shall include but not be limited to:
- CH₄
 - CO₂
 - O₂
 - N₂ and
 - Selected fluorocarbon and hydrocarbon gases.
- The monitoring methodology should follow that described by NSW EPA Environmental Guidelines for Solid Waste Landfills (2nd Edition, 2016, or most recent publication), or other methodology as approved by Waikato Regional Council.
- 33) Within 10 working days of the receipt of gas monitoring results, the Consent Holder must ensure that all results of the monitoring are forwarded to Waikato Regional Council.
- 34) If results show the standards set are exceeded, the Consent Holder must liaise with the Waikato Regional Council within 1 month of reporting the findings with a view to determining any reasonably practicable remediation measures to be implemented to remedy or mitigate adverse effects.

Reporting

- 35) The Consent Holder must compile an Annual Report for the activities authorised by this consent, and forward that report to the Council by 1 November of each year, or such other date agreed to in writing by the Council. As a minimum the report must:
- a. Analyse and summarise the results of monitoring undertaken, and records kept, in accordance with the conditions of this consent;
 - b. Provide a log of water use for the site including that abstracted from groundwater within the previous 12 months. The report should also consider the effectiveness of the rainwater harvesting;
 - c. Comment on compliance with all conditions of this consent;
 - d. Make recommendations in relation to monitoring programme changes, operational changes or other matters as appropriate, which are required to ensure compliance with the conditions of this consent;
 - e. Summarise and analyse any non-compliance or difficulties in achieving compliance with the conditions of this consent;
 - f. Comment on the performance and adequacy of the wastewater disposal system, including matters of compliance with conditions of this consent;
 - g. Comment on any complaints received in relation to the discharges to air from the site;
 - h. Any works that have been undertaken to improve environmental performance or that are proposed to be undertaken in the up-coming year to improve environmental performance in relation to the activities authorised by this consent.

Bond

- 36) Prior to the placement of fill material in each individual monofill area authorised by this consent, the Consent Holder must provide and maintain until the completion of closure of each monofill site, in favour of the Waikato Regional Council, a bond to enable:
- a) Compliance with all the conditions of this consent relating to the closure and monitoring of the monofills and to enable any adverse effects on the environment that become apparent during or after the expiry of consent relating to the monofill activities to be avoided, remedied, or mitigated.
 - b) Remediation of the monofill sites in accordance with the Monofill Closeout and Rehabilitation Management Plan as outlined in condition 166.

("Completion of closure" means when the Waikato Regional Council deems that resource consents for each of the monofill sites are no longer required, and that there is no reasonable risk of the site causing further adverse impacts on the environment).

- 37) The bond for each monofill must be in a form approved by the Waikato Regional Council.
- 38) Unless the bond is a cash bond, the performance of all the conditions of the bond must be guaranteed by a guarantor acceptable to the Waikato Regional Council. The guarantor must

bind itself to pay for the carrying out and completion of any condition of the bond in the event of any default of the Consent Holder, or any occurrence of any adverse environmental effect requiring remedy referred to in condition 31.

- 39) The bond amount must be fixed for each monofill prior to the placement of fill material and every fifth anniversary thereafter by the Waikato Regional Council or more frequently if otherwise agreed between the Consent Holder and the Waikato Regional Council. The amount of the rehabilitation bond must be advised in writing to the Consent Holder at least one month prior to the review date.
- 40) If the Consent Holder does not agree with the amount of the bond fixed by the Waikato Regional Council, then the matter shall be referred to arbitration in accordance with the provisions of the Arbitration Act 1996. Arbitration is to be commenced by written notice by the Consent Holder to the Waikato Regional Council advising that the amount of the rehabilitation bond is disputed, with such notice to be given by the Consent Holder within two weeks of notification of the amount of the rehabilitation bond. If the parties cannot agree upon an arbitrator within a week of receiving the notice from the Consent Holder, then an arbitrator is to be appointed by the Chief Executive Officer of the Institution of Professional Engineers of New Zealand. Such arbitrator must give an award in writing within 30 days after his or her appointment, unless the Consent Holder and the Waikato Regional Council agree that time is to be extended. The parties must bear their own costs in connection with the arbitration. In all other respects, the provisions of the Arbitration Act 1996 shall apply. Pending the outcome of that arbitration, the existing bond must continue in force. That sum is to be adjusted in accordance with the arbitration determination.
- 41) If the decision of the arbitrator is not made available by the 30th day referred to above, then the amount of the bond is to be the sum fixed by the Waikato Regional Council, until such time as the arbitrator does make his/her decision. At that stage the new amount is to apply. The Consent Holder must not exercise this consent if the variation of the existing bond or new bond is not provided in accordance with this condition.
- 42) If the amount of the bond to be provided by the Consent Holder is greater than the sum secured by the current bond, then within one month of the Consent Holder being given written notice of the new amount to be secured by the bond, the Consent Holder and the guarantor must execute and lodge with the Waikato Regional Council a variation of the existing bond or a new bond for the amount fixed on review by the Waikato Regional Council. Activities authorised by the consent must not be undertaken if the variation of the existing bond or new bond is not provided in accordance with this condition.
- 43) The bond may be varied, cancelled or renewed at any time by agreement between the consent holder and the Council.
- 44) The bond shall be released on completion of closure of each site, as defined above.

AUTHORISATION FOR DAMMING AND DIVERSION

1. This consent shall commence on the date of decision notification (XXXXX) and will expire in 35 years on XXXXXX.
2. The diversion of artificial watercourses (drains), and damming to create a large pond on the site must be undertaken in general accordance with the application documentation for this resource consent and in particular the following documents:
 - a) Earthworks Management and Erosion and Sediment Control Plan, Earthtech Consulting Limited 23 May 2025;
 - b) Roding and Stormwater Report, Airey Consultants Limited 23 May 2025.
3. The consent holder is responsible for any erosion protection, flood protection or control works including associated maintenance that may become necessary by exercising this consent. The consent holder must manage the overland flow paths diversion to avoid the following effects:
 - a) Adverse scour, erosion and sediment deposition on adjoining land or property, and
 - b) Adverse scour, erosion and sediment deposition within the beds of receiving water bodies or stormwater reserves, and
 - c) Adverse flooding of land, property and stormwater reserves or receiving water bodies.