



# memorandum

TO National Steel FROM Nerena Rhodes  
Client Company Name DATE 5 March 2026  
RE Green Steel Fast-track Consent Application Draft Conditions

I have been requested by Green Steel to review various draft conditions proposed for **FTAA-2506-1074** relating to potential compliance issues associated with PFOS limits and draft condition 2 and 30 of the stormwater consent.

I agree with the wording in draft condition 6 of the stormwater consent that the listed effects are to be avoided in the stormwater receiving water bodies after reasonable mixing. Reasonable mixing, which is referenced in the RMA, is a principle of water quality assessment in New Zealand.

In condition 30 note 3 as currently worded it could be interpreted that the trigger values apply to on-site water management infrastructure (e.g. subsurface drains). Another note should be inserted which reiterates the compliance locations for determining whether or not condition 2 is being complied with are at the site boundary. Suggested note text:

These trigger values apply at the locations where groundwater and surface water (after reasonable mixing) discharge from the site.

The guideline referenced in NEMP 3.0 is the 2023 interim default guideline value from ANZG (2023). This interim default guideline value was republished as a default guideline value on 04/03/26. I have not reviewed the technical documentation released by ANZG yesterday in full however, the consent should be flexible enough to ensure ANZG 2026 is applied.

The default guideline value (ANZG, 2026) for PFOS (now final) has superseded the NEMP 3.0. Therefore the consent conditions should be updated to reflect the final default guideline value for PFOS. To deal with any subsequent updates to guidance and other comments an amendment to note 3 of condition 30 is recommended.

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