Hi Stephen.

Here are some comments.

1. New Zealand Green Steel Ltd (NZGS) has identified a water requirement of maximum 2,800 m3 per day and maximum 840,000 m3 per year.

2. The Earthtech report has identified three local water supply options for meeting the water requirement:
    a. taking groundwater via multiple bores at the site;
    b. taking water from the Waikato River;
    c. taking water from roof, road, hardstand and other open areas at the site (local catchment rain harvesting).

3. WRC expert Nicki Wilson has considered the information presented in the report relating to taking groundwater. [redacted]

4. Both Earthtech and Ms Wilson have noted that interference between site supply bores themselves and site supply bores on neighbouring bores seems a prominent risk that will require further assessment.

5. It seems to be the case that there is no guarantee that groundwater will be available in the quantity required because of the need – identified by Earthtech – for bores to be tapping aquifer fractures which are scarce on the site.

6. Taking groundwater in the quantities required would require resource consent.

7. In terms of the option of taking water from the Waikato River, a separate consent held by NZGS allowing this is not preferred because of high capex – headworks and reticulation – compared with increasing the amount of water that NZGS might be able to access via the Te Kauwhata Water Association (TKWA).

8. Taking water from the Waikato River in the quantities required would require a resource consent if NZGS does not opt to increase the supply from TKWA.

9. In terms of local catchment rain harvesting, Earthtech have made indicative calculations and note that further assessment from an expert in this regard will be required to better inform consideration. The calculations indicate that the quantities required would not be able to be met by this option.

10. Taking water from the local catchment as rain harvesting at volumes commensurate with the indicative calculations would require resource consent.

11. The current – as at 22 April 2025 – level of cumulative allocation for the Waikato River main stem catchments relevant to the NZGS site – Waikato River at Mercer and Waikato River at the CMA – is such that:

- there are no allocation pressures requiring a first in first served approach be taken; and
- water is available for allocation across all months of the year within each respective catchment's primary allocable flow and if a resource was granted to NZGS:
    a. to take groundwater in the specified quantities required, water would remain available for allocation with each catchment's primary allocable flow across all months of the year;
    b. to take water from the Waikato River in the specified quantities required, water would remain available for allocation with each catchment's primary allocable flow across all months of the year;
    c. to take water from the local catchment as rain harvesting at volumes commensurate with the indicative calculations, water would remain available for allocation with each catchment's primary allocable flow across all months of the year.

12. I do not expect that increasing the amount to be supplied to NZGS from the TKWA would trigger the need for an additional resource consent to take water.

13. From the Earthtech report, it seems that there might be the possibility of the specified quantities being provided for by an integrated source approach instead of a single source. If this were to be the case, I note that WRC staff would be generally supportive in concept but would of course expect thorough planning and technical assessments be carried out for each respective source and potential associated activities a la intake structures, construction of bores, diversion and possible off-stream damming of water, use of water, etc.

Happy to discuss, etc.

Cheers
Cameron

Cameron King | PRINCIPAL CONSENTS ADVISOR - WATER | Resource Consents - Team 2, Resource Use
WAIKATO REGIONAL COUNCIL | Te Kaunihera ā Rohe o Waikato
[redacted]
F: facebook.com/waikatoregion
Private Bag 3038, Waikato Mail Centre, Hamilton 3240, New Zealand