



# NGAATI TE ATA

*“Ka whiti te ra ki tua o rehua ka ara a Kaiwhare i te rua”*

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31<sup>st</sup> March 2021

Edit Simpson  
Environmental Advisor  
New Zealand Steel

## **Ref: Iwi Consultation: NZS Resource Consent Application**

Tena Koe Edit

### Background

The NZ Steel (NZS) footprint sits on ancestral land of Ngaati Te Ata. This cultural assessment does not prejudice any outstanding Treaty of Waitangi claims relating to these areas. Ngaati Te Ata have had a long history in resource management and environmental issues within each of our rohe. Many changes over the years have not always been in our best interests. Such change has often resulted in the continual degradation of many of our natural and physical resources, waahi tapu sites, and other taonga.

We continue to have a spiritual and emotional relationship to these places. We never forget our connection to these places. They are our inheritance. The ultimate goal is the return of our lands, the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for our interests and values, and enables positive environmental, social and economic outcomes for Ngaati Te Ata.

### RC Application

As part of the Glenbrook consents application process, NZS initiated and held several meetings with our Te Taiao team over the past seven months. Further discussions and updates by NZS led to the development of a document titled *“New Zealand Steel – Glenbrook Steel Mill Reconsenting: Responses to Ngaati Te Ata Cultural Values”* dated 8<sup>th</sup> March 2021, which we understand will be appended to the resource consent application documents.

Those responses from NZ Steel are supported with the proviso that further engagement will need to occur as more information (namely the Air Discharge and the Water Consents) become available for review.

It was agreed, that the key objectives of this consultation process from both parties is to:

1. Acknowledge the traditional and customary relationship Ngati Te Ata has with the NZS areas. The relationship of Ngaati Te Ata and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.
2. Provide recommendations that will protect the natural and physical resources of those areas and our customary relationship with these resources.
3. NZ Steel to continue to work in conjunction with Ngati Te Ata to protect and preserve traditional lands, taonga and its associated areas within those areas and the wider immediate cultural landscape area.

The Ngaati Te Ata Te Taiao team will continue to work with NZ Steel to ensure that best cultural and environmental outcomes are met, and best practice applied, in regards to the NZS resource consent applications. Please note we do not support 35 year long sought consents.

Ngaati Te Ata reserves the right to change our position if there are any changes to the NZS resource consent applications from what was originally placed before us for cultural assessment.

Heoi  
Na

A handwritten signature in blue ink that reads "K. Flavell".

Karl Flavell  
Manager Te Taiao  
Ngaati Te Ata  
Ph: 027 9328998



# New Zealand Steel- Glenbrook Steel Mill Reconsenting: Responses to Ngāti te Ata Cultural Values

As part of the Glenbrook consents application process, New Zealand Steel (NZS) initiated and held several meetings with Ngati Te Ata over the past seven months. The outline of concerns regarding environmental issues (Te Kaitiakitanga o Te Taiao) were provided by Karl Flavell, Environmental Manager of Ngāti Te Ata and the Ngati Te Ata Te Taiao team.

The responses provided by NZS had been presented to the Ngati Te Ata and further discussions and updates led to the development of this document.

The NZ Steel Mill footprint sits on ancestral land of Ngati Te Ata. This cultural assessment does not prejudice any outstanding Treaty of Waitangi claims relating to these areas. Ngati Te Ata have had a long history in resource management and environmental issues within each of our rohe. Many changes over the years have not always been in our best interests. Such change has often resulted in the continual degradation of many of our natural and physical resources, wāhi tapu sites, and other taonga. We continue to have a spiritual and emotional relationship to these places. We never forget our connection to these places. They are our inheritance. The ultimate goal is the return of our lands, the protection, preservation and appropriate management of natural and cultural resources in a manner that recognises and provides for our interests and values, and enables positive environmental, social and economic outcomes for Ngati Te Ata.

The key objectives of this consultation process is to:

1. Acknowledge the relationship Ngati Te Ata has with the NZ Steel area. This includes our relationships with our culture and traditions with our ancestral lands, water, sites, wāhi tapu, and other taonga.

2. Provide recommendations that will protect the natural and physical resources of those areas and Ngati Te Ata’s relationship with these resources.
3. NZ Steel to continue to work in conjunction with Ngati Te Ata to protect and preserve traditional lands, taonga and its associated areas within those areas and the wider immediate cultural landscape area.

Ngāti te Ata – Outline of Te Kaitiakitanga o Te Taiao	Response to Ngāti te Ata cultural values document
<p><b>Physical landscapes</b></p> <ul style="list-style-type: none"> <li>• <b>Physical landscapes are an integral part of our cultural landscape and urban development may have a significant adverse effect on these physical landscapes</b></li> <li>• <b>Identification and preservation of landscapes is required</b></li> </ul>	<p>NZS acknowledges visual changes to the landscape to the existing environment from time before industrial activity and development.</p> <p>The visual profile of the existing landscape is now fixed or transient (plumes) and there are no further changes to the existing landscape proposed in the consent application.</p>
<p><b>Cultural Heritage</b></p> <ul style="list-style-type: none"> <li>• <b>A need to protect and preserve our remaining cultural heritage from intensifications of development within the Southern area.</b></li> <li>• <b>Reliance on scheduled items (e.g. NZAA/CHI places</b></li> <li>• <b>Incomplete cultural heritage surveys</b></li> </ul>	<p>Records (map drawing and list) of the archaeological sites on and surrounding the Glenbrook Mill site are kept by NZ Steel.</p> <p>The proposed discharge consents do not include new activities, and no known effects to the sites from activities covered by the existing consents.</p>
<p><b>Urban development</b></p> <ul style="list-style-type: none"> <li>• <b>Inappropriate form, location and scale of urban development.</b></li> <li>• <b>Increased risk of cumulative adverse effects as land uses change and development intensifies.</b></li> <li>• <b>Loss of important horticultural land affecting future food production</b></li> <li>• <b>Extent of previous planning areas differs.</b></li> </ul> <p><b>Soil and earthworks</b></p> <ul style="list-style-type: none"> <li>• <b>Future development of these areas is expected to result in a significant number of large-scale earthworks [...].</b></li> </ul>	<p>This consent application is for existing activities undertaken by NZ Steel, within the established industrial site and its property. As good practice NZ Steel has in place soil and erosion control processes for any earthworks/excavation undertaken within the Mill site.</p>

Ngāti te Ata – Outline of Te Kaitiakitanga o Te Taiao	Response to Ngāti te Ata cultural values document
<ul style="list-style-type: none"> <li>• Earthworks may have an adverse effect on cultural heritage, land stability and the mauri of water.</li> <li>• Sediment may be released into the environment, including that from contaminated soils. Potentially contaminated soils may be used as fill</li> <li>• Loss of productive capacity/value of land in the south</li> </ul>	
<p><b>Waterways</b></p> <ul style="list-style-type: none"> <li>• Past land uses and practices have altered and degraded waterways.</li> <li>• Future urban development could adversely affect waterways [...]</li> <li>• Increased risk of cumulative adverse effects</li> </ul>	<p>This consent application is for existing activities undertaken by NZ Steel, within the established industrial site and its property.</p> <p>This consent application includes consents for diversion of the North Stream and the stream now flows through an artificial channel (concrete and aggregate). Even though a natural form has been sought for the diverted North Stream and riparian planting undertaken, the diversion provides less than ideal habitat. Comment on water quality are outlined below.</p>
<p><b>Water Quality</b></p> <ul style="list-style-type: none"> <li>• Degradation of water quality has happened at a national and local level. Adverse effects are becoming more evident.</li> <li>• Adverse effects caused by past land uses and practises such as farming, horticulture, urban development, point and no-point source discharges, erosion and sedimentation.</li> <li>• Increased nutrient levels and contaminants in waters are a risk to human and animal health</li> <li>• Increased risk of cumulative adverse effects as land uses change and development intensifies</li> </ul>	<p>NZ Steel has a high level of compliance with existing resource consents. NZ Steel discharges into water are subject to stringent water quality monitoring protocol and compliance conditions (daily monitoring for Waiuku River discharges; continuous monitoring of North Stream discharge monthly to ITA (industrial) discharges to other streams and 3 monthly for southern yards runoff to Ruakohua Stream).</p> <p>Where water quality parameters have occasionally exceeded consent limits, investigation-trigger levels, and/or guidelines NZ Steel has investigated causes and worked to ensure improvements are in place. For this consent application a water quality assessment was completed to determine the effect of discharges on human health and the environment. This is informing investigations on how further improvements can be made for all discharges from the Mill Site</p> <p>Modelling of the multiple discharges was completed to help with the assessment. This is a simulation of where the discharges from the Mill Site goes within the</p>

	<p>Waiuku Estuary. This modelling suggests that Mill discharges contribute 40% of zinc loading into the mixing zone. However, ecological surveys show that zinc concentrations in oysters that are not harmful for human consumption. Also, sediment and benthic sampling (micro-organisms) are below Council high-alert levels.</p> <p>NZ Steel anticipate new consent conditions to have lower compliance levels than current ones due to changes to ANZ water quality guidelines. As such, NZ Steel is working to identify further possible improvements to the existing Water Treatment Plants on the Mill Site. NZ Steel has stringent controls and careful management for chemical substances. Bunding is in place where substances are stored. Good compliance with the HSNO storage regulations, regularly assessed by third party audits.</p> <p>In recent years, substantial improvements have been made to treatment devices for yard runoff discharging to the North Stream, particularly for first-flush higher sediment loadings. Treated water from delivery of iron sand to the Mill site has higher conductivity, due to the location the water is abstracted from the Waikato River and this will be affecting stream habitat. NZ Steel is evaluating further improvements to water quality of the North Stream.</p> <p>In the southern portion of site, the ecological studies of the Ruakohua Stream show that the portion of the stream within the Mill Site are in a better health state than the upper catchment. Fish passage is in place on the stream within the Mill Site.</p>
<p><b>Groundwater, recharge and water allocation</b></p> <ul style="list-style-type: none"> <li>• <b>Disruption to natural recharge of groundwater and stream base flow due to increased urban development</b></li> <li>• <b>Adverse effects of lowering groundwater e.g. ground settlement saline intrusion</b></li> </ul>	<p>This consent application is for existing activities undertaken by NZ Steel, within the established industrial site and its property. Therefore, the area of impervious surfaces (sealed or buildings) will remain within the existing configuration, unless an environmental benefit is associated with sealing a surface or covering an activity.</p>

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<ul style="list-style-type: none"> <li>• <b>Increase risk of cumulative adverse effects as development intensifies</b></li> <li>• <b>Ongoing discharge of low-level contaminants into groundwater which will adversely affect the environment and human health</b></li> <li>• <b>Protection of maunga and tuff rings as an avenue for direct groundwater recharge</b></li> </ul>	<p>This consent application does not include any new activities that might increase groundwater contamination risk. However, NZ Steel does have a groundwater monitoring program in place and results confirm that groundwater quality on the site is stable.</p>
<p><b>Stormwater</b></p> <ul style="list-style-type: none"> <li>• <b>Mixing of waters, especially clean roof water with contaminated run off</b></li> <li>• <b>Treatment of contaminated stormwater – follow best practice</b></li> <li>• <b>Efficient use of water</b></li> </ul>	<p>On the Mill Site, the runoff from building roofs and areas in use for Mill activities requires treatment before reuse or discharge. For that reason, all stormwater is collected for treatment, therefore, stormwater and process water are combined in the treatment ponds. This also allows the treated pond water to be recirculated to help NZ Steel achieve the high level of water recycling it has maintained for 25 years.</p> <p>Water is recycled from the treatment ponds into the operational process, meaning less fresh water is needed in the Mill processes</p> <p>Discharge into the Waiuku mixing zone is the subject of strict water quality monitoring and compliance with resource consent conditions.</p> <p>NZS has a high level of improvement activities regarding water use (intensity).</p>
<p><b>Wastewater</b></p> <ul style="list-style-type: none"> <li>• <b>Discharge of effluent into natural water bodies is culturally offensive, land-based treatment is required instead.</b></li> <li>• <b>Effects of new urban development on existing wastewater infrastructure including increased risk of cumulative adverse effects as land uses change and development intensifies.</b></li> </ul>	<p>Wastewater from the Mill site lunchrooms, kitchens, toilets and showers (effluent) is piped to the Waiuku municipal waste-water system, on the southern boundary of the Mill site.</p>
<p><b>Biodiversity (covers 1.2.4.1 Indigenous Vegetation as well)</b></p> <ul style="list-style-type: none"> <li>• <b>Biodiversity is integral to mana whenua.</b></li> </ul>	

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<ul style="list-style-type: none"> <li>• <b>Biodiversity is under continual threat, through a lack of inadequate legal protection, incompatible adjacent land uses and human-related impacts within their catchments.</b></li> <li>• <b>Significant loss of indigenous flora and fauna is a primary risk to biodiversity</b></li> </ul>	<p>Ecological enhancement on site has taken place over 20 years on the NZ Steel property</p> <ul style="list-style-type: none"> <li>• &gt;250,000 native plants have been planted along streams and property boundaries</li> <li>• &gt;90% of site streams and waterways fenced and planted (a portion of this has been required by consent condition).</li> <li>• Boundary planting and replacement of pine shelter belts (farm) with native vegetation.</li> <li>• Continued coastline enhancement.</li> <li>• Native plant nursery.</li> <li>• Protection of SNA blocks in industrial zone =&gt;</li> </ul> <p>NESFW requires additional fencing and planting and this will be progressed over the next two years</p>
<p><b>Sustainability (covers 1.2.5.1 Sustainable Development)</b></p>	<p>NZS sustainability governance, principles and performance are summarised in the 2019 Sustainability Snapshot Brochure – also available at <a href="http://www.nzsteel.co.nz/sustainability">www.nzsteel.co.nz/sustainability</a>.</p> <p>Using steel as a building material supports sustainable development, it has a long life and indefinitely recyclable.</p> <p>Co-products from Mill manufacturing processes, such as aggregate is sold for roading and water treatment.</p> <p>Certification to international standards for Environmental Management ISO 14001 and Quality (ISO 9001) Certification to the NZ eco-labelling standard (Environmental Choice).</p> <p>Full life-cycle-assessment for a range of NZ Steel products provide transparency and verified environmental data to consumers of NZ Steel products.</p>
<p><b>Natural Hazards</b></p> <ul style="list-style-type: none"> <li>• <b>Natural hazards, climate change and global warming can have a negative effect on human health, property, natural environment and areas of cultural and spiritual significance</b></li> </ul>	<p>This consent application is for existing activities undertaken by NZ Steel, within the established industrial site and its property. Earthquake risk was considered</p>



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<p><b>e.g. sea level rise and increase in erosion and droughts, reduced visibility of cultural and /or spiritual resources and activities.</b></p> <ul style="list-style-type: none"> <li>• <b>Natural hazards cannot necessarily be management in the same manner as natural resources. Appropriate natural hazard risk management is required.</b></li> <li>• <b>The effects of natural hazards can be exacerbated by inappropriate subdivision, land use or development e.g. increased frequency or severity of landslips caused by poor land management practices.</b></li> <li>• <b>Increased risk of cumulative adverse effects as land uses change and development intensifies.</b></li> </ul>	<p>before the Mill was constructed in 1968. A geotechnical assessment was carried out to ensure maximum earthquake resistance.</p> <p>Climate change and potential sea-level rise is relevant with discharges into the coastal marine area (CMA): outfall structures have been assessed for structural integrity (not causing erosion) and to ensure the structures are not affected by possible future increasing sea levels.</p>
<p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• <b>Provision of infrastructure is not matching the pace of urban growth.</b></li> <li>• <b>Inadequate and deteriorating infrastructure such as wastewater and stormwater pipes are causing environmental effects.</b></li> <li>• <b>Wastewater Treatment Plants are problematic and better options exist</b></li> <li>• <b>Transport options need improving to create health and connected communities</b></li> <li>• <b>Fast broadband is needed.</b></li> <li>• <b>Provision of infrastructure should use a water sensitive approach.</b></li> </ul>	<p>This consent application is for existing activities undertaken by NZ Steel, within the established industrial site and its property.</p> <p>Existing infrastructure is subject to regular maintenance and monitoring.</p>
<p><b>Urban Design</b></p>	<p>The proposal does not relate to residential or public urban development.</p>
<p><b>Air</b></p> <ul style="list-style-type: none"> <li>• <b>Discharges to air can reduce air quality and cause noise pollution and light pollution.</b></li> </ul>	<p>NZS highest level of capital investment for environmental controls is to provide for treatment of discharges from the Mill manufacturing facilities in order to meet stringent air quality standards (local and national).</p>

## Ngāti te Ata – Outline of Te Kaitiakitanga o Te Taiao

- **Discharges to air can have a significant adverse effect on human health, the environment and cultural values and practices.**
- **Effects can be cumulative.**
- **The deposition of air pollutants onto mahinga kai (where food and resources are still traditionally gathered by our people.**
- **The reduction of visibility to our waahi tapu and ancestral maunga (Pa). Ngāti te Ata concern that the sightlines are not impeded upon by air cloud pollutants. Our priests when undertaking karakia (prayers) and our speakers when undertaking mihi (speeches) on our marae always turn to face our special places, wāhi tapu and maunga.**
- **Increase in airborne smell (eg. Some heavy industrial processing plants have a particular smell associated with their activities and discharges into the air.**
- **Impact of contaminants on important or valued sites (e.g. discharge material from heavy industry can be blown by predominant winds over a large area onto mahinga kai areas across the harbour**
- **Hauroa (health) of our people, particularly kaumatua whom many suffer from lung infected illnesses. Many of our people believe the NZ Steel Mill is an example of this where years of air discharge have played their part in the demise of health in many of our kaumatua and people over the years.**

## Response to Ngāti te Ata cultural values document

NZS applies a complex system of controls (extraction equipment, baghouses, wet scrubbers) and stringent monitoring protocols to ensure point source emissions are as clean as possible when leaving the process. There has been a high level of compliance with resource consent conditions. Where air discharge emissions have not met consent limits or investigation trigger levels, NZ Steel has investigated causes and worked to ensure improvements are in place.

A health risk assessment has been undertaken to evaluate the effects of Mill activities, to ensure the life supporting capacity of the air is maintained. Samples have been taken and tested from neighbouring property collecting roof water in-tanks for household use. Results indicate that the quality of water is not deteriorated.

The six existing ambient air quality monitoring stations are continuously monitoring the air quality within the community. Staff receive “text alerts” when increased dust levels are recorded so that appropriate response can be taken.

Results from the monitoring station downwind (north east) of the Mill Site indicate an increase (gradual upward trend) in annual average PM10 concentrations in recent years. A range of improvements are already underway, such as: -

- Two new high-capacity water trucks for unsealed roads
- Quick-fill water station for water carts to increase frequency of water applied
- New road sweeper truck for sealed roads
- Sealing Site roads by a large number of large vehicles;
- Installation of fixed water sprays

In addition, to reduce the very visual plume (low dust level) when molten iron must be tipped in the open, a fume suppression system installation for iron-plating.

## Mikayla Woods

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**From:** Lucie Rutherford <rmaofficer@tamaoho.maori.nz>  
**Sent:** Tuesday, 6 April 2021 11:51 am  
**To:** Simpson, Edit ES; Edith Tuhimata  
**Subject:** Re: NZ Steel Air Quality AEE Consultation/CVA

Claire Jewel  
Environmental Manager  
Glenbrook Steel Mill  
Glen Brook Rd  
Auckland

1st April 2021

Ref: Discharge Renewal Consent:Steel Mill

Tena Koutou Vicky, Claire and Edit, and your team,

Thankyou for going through the proposed renewal of the discharge consent with us. Further to our meeting onsite, on the 25th of March 2021 and my assessment of the application including related documentation we can now confirm our position in regards to the input into the assessment of effects for renewal of the air discharge consent.

Application Detail: This is a renewal of the current discharge consent for a further 35years.

### Cultural Landscape:

The Manukau was a well-travelled route and considered a gateway into areas of settlement, resource use and occupation. The main waka route used by all tribes traversing North and South was via the Waikato River then onto the Manukau Harbour via the Awaroa Portage. Wahi nohoanga (encampments) are still known among Iwi today, headlands, promontories around the Harbour. From these vantage points, access to kaimoana was good and it was possible to observe waka movements and receive early warning of the approach of friend or foe.

### Maori World View:

The Maori worldview of land – Papatuanuku is that we hold it in the highest esteem. It provides a home for us, provides for our nutritional needs, sustains our farms and our families, and when we pass on we go back to the land. The importance of the sustainability of the land is a personal stake and if we treat the land right it will be around for the next generations. It is an integral part of our culture and the cultural landscape. Its importance is told in our creation stories, our genealogy/whakapapa, our speeches/whaikorero, our Whakatauaki/proverbs. It has a mana/strength, tapu/sacredness, a wairua/spirit, mauri/essence of its own. It maintains, cleanses, gives, and takes life; therefore, we will always have concern for the integrity and sustainability of land, air, and water.

### Assessment:

After reviewing the documentation and researching of the area through New Zealand Archaeological Association, Cultural Heritage Inventory: Geo Maps and the Iwi Database of Cultural Heritage. We know there is a number of sites in and around the surrounding area.

Potential issues of significance for Maori, with respect to air discharge proposals, include the:

- deposition of air pollutants onto mahinga kai (places where food and resources are traditionally gathered), and waahi tapu (sacred places) taonga tuku iho.

- reduction of visibility
- increase in airborne smell (eg, some industrial-processing plants have a particular smell associated with their activities and discharges into air)
- Impact of contaminants on important or valued sites (eg, discharge material from heavy industry can be blown by predominant winds over mahinga kai).

#### Cultural Effects and Engagement to Date:

Air is considered a taonga (treasure) by Māori. Degraded air quality can diminish mauri which upsets the balance within a system and affects the relationship between people and the environment, and the ultimate health of all living things. In accordance with the RMA, NZ Steel recognises that Māori relationships with land and water are a matter of national importance and regard must be had to their role of kaitiakitanga (guardianship).

This AEE describes the management of air discharges and the resulting actual and potential effects on human health and the environment. NZ Steel has been working with local mana whenua to understand the potential cultural effects associated with the discharges to air from the Site.

NZ Steel has a long-standing relationship with Ngati Te Ata and Ngāti Tamaoho and has undertaken specific engagement with both parties in relation to this application. NZ Steel is committed to strengthening its existing relationship with local iwi and to fostering mutual respect. Cultural and traditional activities might be affected by the Steel Mill's discharges to air, and the importance of and seeking consultation and discussion is recognised.

#### Assessment of effects:

The two key adverse effects considered in this assessment report are: potential effects on human health arising from discharges of contaminants, including particulate matter, products of combustion and heavy metals; and effects on amenity values arising from discharges of dust and odour.

#### Cultural Landscape:

The Manukau was a well-travelled route and considered a gateway into areas of settlement, resource use and occupation. The main waka route used by all tribes traversing North and South was via the Waikato River then onto the Manukau Harbour via the Awaroa River. Wahi nohoanga (encampments) are still known among Iwi today, headlands, promontories around the Harbour. From these vantage points, access to kaimoana was good and it was possible to observe waka movements and receive early warning of the approach of friend or foe.

We seek to protect as much of this cultural landscape as possible.

The Maori worldview of land/water/Air – Papatuanuku/wai/Ranginui is that we hold them in the highest esteem. Papatuanuku provides a home for us, provides for our nutritional needs, sustains our farms and our families, and when we pass on we go back to the land. The importance of the sustainability of the land is a personal stake and if we treat the land right it will be around for the next generations. It is an integral part of our culture and the cultural landscape. Its importance is told in our creation stories, our genealogy/whakapapa, our speeches/whaikorero, our Whakatauki/proverbs. It has a mana/strength, tapu/sacredness, a wairua/spirit, mauri/essence of its own. It maintains, cleanses, gives and takes life; therefore, we will always have concern for the integrity of land, water, air. The first breathe of air or life is always from the nose, we declare tihei mauri ora it is in our greeting a Hongi this demonstrates our regard for air as a people.

After reviewing the documentation and researching of the area through New Zealand Archaeological Association, Cultural Heritage Inventory: Geo Maps and the Iwi Database of Cultural Heritage. There is known cultural heritage within the area of this project, but the surrounding landscape has been significantly modified in the establishment of the Steel Mill.

From a cultural perspective, we agree that this application for renewal air discharge may continue in principal so long as ongoing meaningful engagement and consultation continues over time.

We would like to also recommend the following conditions:

We must take into account that the discharge from the Steel Mill will not affect the Waiuku Estuary and or the users of the reserve we must be certain that contaminants will not affect the health of the people or the health of the Awa its resources surrounding this area that were used for mahinga kai (tuna, watercress, koura, kokopu, kaimoana) we must ensure no air contaminants will not go into any of our airways or out into the Manukanuka o Hoturoa and as long as the proposed maintenance schedule for the plant is adhered to at all times and any tears in the filter system is addressed as soon as system recognition identifies any problems.

- we recommend and reinforce the continual monitoring of the discharge of contaminants and a strict cleaning regime throughout the plant at all times. Proviso of an Emergency Containment plan should anything else happen within the plant.

We Recommend Better Pollution prevention measures to include:

- cleaner production technologies
- where waste reduction is a focus of industrial process design and operation so that more benign and fewer raw materials are used, less energy is consumed, and fewer waste materials are released to air, land or water, etc pollution control equipment - best practice currently used in the industry today.
- the use of appropriately sized stacks to ensure adequate dispersion of emissions to air before a pollutant plume reaches potentially affected receptors.
- the use of management or operational controls, such as process or emissions monitoring or management plans 40 Good Practice Guide for Assessing Discharges to Air from Industry
- the use of buffer zones to separate receptors.
- We recommend a 10 + 10 + 10 year term for discharge, upon review consecutively.

The way we use land can have a major effect on the environment we must ensure that we are using sustainable management methods within the development to ensure the integrity of the land/whenua/ air/hau and water/wai. We need to regulate and monitor any discharges to the land to ensure effluent and silt runoff does not enter our waterways or pollutants are discharged to air that is detrimental on our taonga Ranginui within our cultural landscape.

If you have any questions, please don't hesitate to call.

Nga Mihi  
Edith Tuhimata  
Kaitiaki Taiao  
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## Mikayla Woods

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**From:** NZSAKL Environmental Mailbox  
**Sent:** Wednesday, 11 November 2020 3:35 pm  
**To:** wikitoria.tane@tainui.co.nz  
**Subject:** New Zealand Steel Air and Water Discharges Consent Application  
**Attachments:** Consultation Brief Nov 2020.pdf

Tēnā koe

### Re. New Zealand Steel Air and Water Discharges Consent Application

New Zealand Steel is currently in the process of preparing a consent application to replace resource consents relating to air and water discharges, that are due to expire in late 2021. Auckland Council has advised us that Te Whakakitenga o Waikato Incorporated (Waikato - Tainui) may have an interest in this process.

We have a long standing relationship with Ngati Te Ata, as such over the last few months we have sought their contribution in assessing cultural values in relation to the Glenbrook Steel Mill activities.

Please find attached a Consultation Brief containing information about NZ Steel, our environmental performance, the relevant resource consents and the expected timeline of the consenting process.

We would greatly appreciate if you would respond by **6 December 2020** to let us know if you would like to be involved, or if you have no interest in our application. We are happy to meet with you and others, at your earliest convenience, to discuss our consent application, that will be lodged in early April 2021.

We appreciate your time in considering this matter.

Ngā mihi



**Edit Simpson** | Environmental Advisor  
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**A** Private Bag 92121 | Auckland 1142 | New Zealand

## Mikayla Woods

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**From:** NZSAKL Environmental Mailbox  
**Sent:** Wednesday, 11 November 2020 3:39 pm  
**To:** kowhaiolsen@makauramaraemaoritrust.co.nz  
**Subject:** New Zealand Steel Air and Water Discharges Consent Application  
**Attachments:** Consultation Brief Nov 2020.pdf

Tēnā koe

### Re. New Zealand Steel Air and Water Discharges Consent Application

New Zealand Steel is currently in the process of preparing a consent application to replace resource consents relating to air and water discharges, that are due to expire in late 2021. Auckland Council has advised us that Makaurau Marae Māori Trust (Te Ahiwaru - Waiohua) may have an interest in this process.

We have a long standing relationship with Ngati Te Ata, as such over the last few months we have sought their contribution in assessing cultural values in relation to the Glenbrook Steel Mill activities.

Please find attached a Consultation Brief containing information about NZ Steel, our environmental performance, the relevant resource consents and the expected timeline of the consenting process.

We would greatly appreciate if you would respond by **6 December 2020** to let us know if you would like to be involved, or if you have no interest in our application. We are happy to meet with you and others, at your earliest convenience, to discuss our consent application, that will be lodged in early April 2021.

We appreciate your time in considering this matter.

Ngā mihi



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## Mikayla Woods

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**From:** NZSAKL Environmental Mailbox  
**Sent:** Wednesday, 11 November 2020 3:41 pm  
**To:** office@ngatimaru.iwi.nz  
**Subject:** New Zealand Steel Air and Water Discharges Consent Application  
**Attachments:** Consultation Brief Nov 2020.pdf

Tēnā koe

### Re. New Zealand Steel Air and Water Discharges Consent Application

New Zealand Steel is currently in the process of preparing a consent application to replace resource consents relating to air and water discharges, that are due to expire in late 2021. Auckland Council has advised us that Ngāti Maru Rūnanga Trust may have an interest in this process.

We have a long standing relationship with Ngati Te Ata, as such over the last few months we have sought their contribution in assessing cultural values in relation to the Glenbrook Steel Mill activities.

Please find attached a Consultation Brief containing information about NZ Steel, our environmental performance, the relevant resource consents and the expected timeline of the consenting process.

We would greatly appreciate if you would respond by **6 December 2020** to let us know if you would like to be involved, or if you have no interest in our application. We are happy to meet with you and others, at your earliest convenience, to discuss our consent application, that will be lodged in early April 2021.

We appreciate your time in considering this matter.

Ngā mihi



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## Mikayla Woods

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**From:** NZSAKL Environmental Mailbox  
**Sent:** Wednesday, 11 November 2020 3:44 pm  
**To:** kaitaki@teakitai.com  
**Subject:** FW: New Zealand Steel Air and Water Discharges Consent Application  
**Attachments:** Consultation Brief Nov 2020.pdf

Tēnā koe

### Re. New Zealand Steel Air and Water Discharges Consent Application

New Zealand Steel is currently in the process of preparing a consent application to replace resource consents relating to air and water discharges, that are due to expire in late 2021. Auckland Council has advised us that Te Ākitai Waiohua Iwi Authority (Te Ākitai Waiohua) may have an interest in this process.

We have a long standing relationship with Ngati Te Ata, as such over the last few months we have sought their contribution in assessing cultural values in relation to the Glenbrook Steel Mill activities.

Please find attached a Consultation Brief containing information about NZ Steel, our environmental performance, the relevant resource consents and the expected timeline of the consenting process.

We would greatly appreciate if you would respond by **6 December 2020** to let us know if you would like to be involved, or if you have no interest in our application. We are happy to meet with you and others, at your earliest convenience, to discuss our consent application, that will be lodged in early April 2021.

We appreciate your time in considering this matter.

Ngā mihi



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