

30 November 2021

Manager - Consents
Hawke's Bay Regional Council
Private Bag 9002
Napier 4110

Christchurch Office
292 Main South Road
Hornby
Christchurch, 8042
New Zealand

To: Malcolm Miller

Tēnā koe,

Ravensdown is pleased to submit the enclosed application for 35-year consents for discharges to land, water and air, water take and land use associated with the ongoing operation of our superphosphate manufacturing site at 200 Waitangi Road, Awatoto, Napier (Napier Works).

Ravensdown exists to "Enable Smarter Farming for a Better New Zealand" and sustainable, long-term manufacturing in Napier is a cornerstone of our strategy. Napier Works is the largest plant of its type in the country and is a nationally important strategic asset for the Hawke's Bay Region, North Island farmers and growers as well as for 'New Zealand Inc.'

The works is an integral part of the local community and economy. We are Port of Napier's largest importer, employ 71 at the site and a network of about 170 contractors with a combined wage bill of over \$10 million.

We are committed to reducing the environmental impact of our own operations, and this application seeks to position the certainty of long-term operations at Napier with demonstrable ongoing improvements in environmental outcomes, in partnership with mana whenua and other stakeholders. The company has been continually upgrading the Napier manufacturing asset with \$23M of capital invested over the last five years (including the current fiscal year). We plan to invest further, with at least \$15M per annum earmarked for the next five years.

In seeking a 35-year consent timeframe, we aim to provide certainty to our shareholders and customers that Napier Works will remain a vital asset to the primary sector and provide a return on their investment. In return, Ravensdown is proffering an extensive programme of new works and conditions including:

- An adaptive water management solution which, over time, will create a step change in the way we manage storm and process water. New water treatment systems will be built to enable the preferential discharge of treated stormwater and process water to land via irrigation, with any discharges of water that need to be made to the Waitangi Estuary complying with the discharge standard expectations of the TANK plan change.
- Investments in new fluoride scrubbers for manufacture and modern converter technology at the acid plant will ensure discharges to air not only comply with applicable standards but are minimised by the adoption of best practicable option technology.
- A 10-yearly best practice technology review will ensure stakeholders can be satisfied that the technology employed at the site remains relevant throughout the duration of the 35 years.

- A “Habitat Abundance Restoration Project” (HARP) which is a major wetland restoration project in an area adjacent to Napier Works in conjunction with mana whenua and Hawke’s Bay Regional Council.
- A commitment to invest in rangatiratanga – leadership, through a long-term relationship with mana whenua to work together towards achieving the desired cultural outcomes over the long term, including manaakitanga for the cultural values of the river/estuary environment we operate within.

The consent application has been developed by a panel of qualified and independent experts in each of their fields. This has been coupled with a strong stakeholder engagement process. Key to this has been the establishment of a Technical Focus Group (TFG) of interested and knowledgeable contributors, who have helped direct the development of the proposals presented in the application.

Ravensdown looks forward to a timely and successful outcome for all stakeholders with an open and engaging approach through the next phase of the consent process.

Nāku iti noa, nā



Garry Diack
Chief Executive