

4th November 2022

Reference Number: APP-126684

C/O Mott MacDonald
139 Pakenham Street
Wynyard
Auckland

To Hawke's Bay Regional Council (HBRC) and Ravensdown

Re: Ravensdown Multiple Resource Consent Applications – Notice of Health no longer wishing to be heard on their submission pending withdrawal by all other submitters that may change Draft Consent Conditions 28th October 2022.

Commendation is given to all parties that have worked through concerns relating to these consent applications. Mediation has been undertaken in good faith and partnership with local Iwi and has resulted in a positive outcome with the HARP (estuary restoration project).

Health (Te Whatu Ora) considered all consent applications from Ravensdown through the Profit, People, Planet lens. Health supports the privilege of a 35-year time-frame for the two main discharge consents, Air and Land, along with the 35-year consent to take water.

Ravensdown has operated for many years on the current site and understands the discharges created by their commercial processes. The investment into a larger stack and long-term operating certainty offered by the consents will return profit for the company and support the complex web of people around New Zealand that benefit from Ravensdown operations, supplies and services.

The initial submission from Health was based on the notion of continual review, improvement and appreciation of future expectations aligned with protection of the Planet (Environment and Public Health). The opportunity for Ravensdown to openly take ownership in the review process was somewhat limited by adhering to sections of the Resource Management Act (RMA) - limiting the review to a "Technology Review" (Clause 56 in Draft consent conditions). Consent conditions limited the review to a "Best Practicable Option technology review (covering the matters described in Part 2 under the definition of Best Practicable Option of the RMA)".

Although Clause 62 in the Draft Conditions gives HBRC the ability to review the consent, ensuring it is consistent with 'requirements in a regional plan or a National Environmental Standard' (Clause 62b), it misses the point made from Health that Ravensdown should/must take ownership for the long-term improvement for discharges to the environment.

Health used as an example in consent mediation with Ravensdown the WHO 2021 Global Air Quality Guidelines. Although the WHO guidelines set out some long-term and perhaps aspirational goals, Health believes Ravensdown should be taking ownership of their discharges for the future of the planet ensuring sustainability and health of the environment.

By limiting the scope of the review in the consent conditions Health believes Ravensdown missed the opportunity to make this a fully workable consent for generations to come.

It is appreciated that going 'above and beyond' the mandates of the RMA is not required nor expected. However, the full review of all Ravensdown processes, Plans, SOP's, Modelling, Monitoring, Improvements along with positive/negative effects to the environment should form the basis of the review. Moreover, in re-evaluating all aspects of the Ravensdown activities internally against impending or new legislation/guidelines would ensure the consent is also improved for each generation having to work within the drafted conditions.

At this stage, as long as all other submitters have withdrawn their request to be heard thus muting the need for a hearing then:

- Health no longer wishes to be heard in relation to their submission.

If other submitters feel the need to take outstanding issues to a hearing that may change consent conditions, then Health would still like to be heard. In-part Health would be supporting the term of consents and conditions, however would take the opportunity to talk to the points raised above, and consider points from other submitters.

Thank you for the opportunity to be involved through the mediation process and welcome communications bringing the consent application to the end of the process.

Warmest Regards

Reynold Ball



Health Protection Officer

Te Whatu Ora
National Public Health Service | Te Matau a Māui
Hawke's Bay District