

**IN THE ENVIRONMENT COURT  
WELLINGTON REGISTRY**

**I TE KŌTI TAIAO O AOTEAROA  
TE WHANGANUI-A-TARA ROHE**

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**ENV-2024-WLG-001**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** the direct referral of applications for resource consents by  
under section 87G of the Act for the Mt Munro Wind Farm

**BY** **MERIDIAN ENERGY LIMITED**  
Applicant

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**STATEMENT OF EVIDENCE OF DEBORAH RYAN**

**ON BEHALF OF MANAWATŪ-WHANGANUI REGIONAL COUNCIL, GREATER  
WELLINGTON REGIONAL COUNCIL, TARARUA DISTRICT COUNCIL, AND  
MASTERTON DISTRICT COUNCIL**

**GREENHOUSE GAS EMISSIONS**

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Dated: 23 August 2024



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## STATEMENT OF EVIDENCE OF DEBORAH RYAN

### A. INTRODUCTION

- [1] My name is Deborah Ryan. I am a Strategic Director Sustainability and Technical Director Air Quality with Pattle Delamore Partners Limited.
- [2] I prepared a report on the application required by s 87F of the Resource Management Act 1991 (**RMA**) on behalf of Manawatū-Whanganui Regional Council (**Horizons**) and Wellington Regional Council (**WRC**) Tararua District Council (**TDC**), and Masterton District Council (**MDC**) (the **Consent Authorities**) dated 15 March 2024 (**s 87F Report**).
- [3] In my s 87F Report, I reviewed the application from Meridian Energy Limited (the **Applicant** or **Meridian**) for resource consent applications lodged with the Consent Authorities for the Mt Munro Wind Farm (**Mt Munro Project** or **Project**) in relation to greenhouse gas (GHG) emissions. The s 87F Report provided recommendations to improve or further clarify aspects of the resource consent applications, including with regard to conditions, should the Court be minded to grant resource consents.
- [4] I confirm I have the qualifications and experience set out at paragraphs 5-10 of my s 87F Report.
- [5] I have not participated in expert conferencing on greenhouse gas (**GHG**) emissions and the effects of land use on climate change. However, I understand that the topic has been the subject of discussions between the planning experts as a consequence of my s 87F Report.

### B. CODE OF CONDUCT

- [6] I repeat the confirmation provided in my s 87F Report that I have read and agree to comply with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with that Code. Statements expressed in this evidence are within my areas of expertise, except where I state I am relying on the opinion or evidence of other witnesses.

### C. SCOPE OF EVIDENCE

[7] My statement will cover the following:

- (a) The extent to which issues identified in my s 87F Report have been resolved through Meridian's evidence, and expert conferencing; and
- (b) Conditions.

[8] In addition to the material that was reviewed for my s 87F Report, I have reviewed the following:

- (a) Joint Statement of Planning Experts dated 9 August 2024 (**Planning JWS**);
- (b) Statement of Evidence of Grant Telfar (Meridian and the Electricity Sector) dated 24 May 2024, on behalf of Meridian;
- (c) The proposed changes to conditions filed with Mr Anderson's evidence (the **Meridian conditions**);
- (d) The section 274 party evidence, although I note that none of the parties raise matters relating to GHG; and
- (e) The draft proposed conditions attached to the evidence of Damien McGahan on behalf of the Consent Authorities (the **August Proposed Conditions**).

### D. OUTSTANDING ISSUES

[9] My s 87F Report highlighted my view of the importance of taking up opportunities to ensure that carbon emissions are reduced on the Project compared to the business as usual case. This would be achieved through considering life cycle carbon in the design, construction, operation and end of life of the wind farm. Given the size and nature of the Project, I consider these opportunities to be material considerations to ensure the effects on climate change are managed over the long term. In my view, notwithstanding the benefits of building renewable energy, projects like the Mt Munro Project can be built and operated in a way that further reduces

impacts on emissions. In my opinion, Meridian should identify how it intends to incorporate management of the lifecycle GHG emission matters into the Project.

[10] Following review of the Meridian evidence there are no substantive matters of disagreement that remain at issue following preparation of my s 87F Report, other than whether GHG emissions should be addressed in the conditions. As I discuss below, despite positive statements of intent to manage GHGs as part of sustainability metrics by Mr Telfar, Meridian has not provided any documentation incorporating GHG emissions management specific to this Project. This is a matter I sought to be addressed via conditions as part of my s 87F Report.

[11] For this reason, I am of the view that an outstanding matter exists as to how the opportunities to reduce GHG emissions will be addressed in conditions.

#### **Opportunities to reduce GHG emissions**

[12] In my s 87F Report, I identified that while Meridian has high level commitments to reduce emissions, such as through its Carbon Action Plan, it had not identified how it intends to incorporate lifecycle GHG emission matters into the Mt Munro Project.<sup>1</sup>

[13] I noted there are opportunities to ensure that carbon emissions are reduced on the Mt Munro Project, compared to the business-as-usual case, through considering life cycle carbon in the design, construction, operation and end of life of the wind farm.<sup>2</sup>

[14] I considered that it would be in-line with emerging good practice for Meridian to identify how it intends to incorporate management of lifecycle GHG emission matters into the Mt Munro Project; leading to reduced GHG emissions and thereby effects on climate change.<sup>3</sup>

[15] In his evidence, Mr Telfar clarified that sustainability and carbon management will be woven into the delivery of the Mt Munro project and

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<sup>1</sup> Section 87F Report – Deborah Ryan (GHG), 15 March 2024 at [14].

<sup>2</sup> At [14].

<sup>3</sup> At [14].

that the Project will align with low carbon dioxide equivalent (CO<sub>2-e</sub>) emissions per gigawatt hour (GWh) on a whole of life basis.

[16] Mr Telfar indicated that Meridian has developed a Sustainability Infrastructure Framework (SIF) to provide a consistent approach for project delivery across its business.<sup>4</sup> I agree that the SIF documentation, if applied to the Mt Munro Project, will help achieve the outcomes I was seeking in my s 87F Report. Mr Telfar also attached as an example, a Sustainability Management Plan (SMP) for the Te Rere Hau Windfarm Repowering that was prepared *“to guide the planning, development and procurement stage of the project in all things sustainability-related, including a strong focus on reducing emissions.”*<sup>5</sup>

[17] Meridian’s proposal for the SIF and SMP approach to GHG emissions management for Mt Munro aligns with my view stated in my s 87F Report, that *“at least a high-level construction emissions management plan is warranted for Mt Munro.”*<sup>6</sup> I recommended that a management plan approach be brought through into conditions of consent.

[18] I agree with Meridian’s proposed approach to managing GHG emissions via the SIF and an SMP. However, Meridian does not agree with the Consent Authorities’ proposed condition CC1 to require project specific documentation.<sup>7</sup> CC1 relates to the Construction Environmental Management Plan (CEMP) that is proposed to include details on how the Project construction and design will address the following:

- (a) Design options to consider the greenhouse gas and life cycle carbon analysis of the built infrastructure; and

<sup>4</sup> Statement of Evidence of Grant Telfar (Meridian and the Electricity Sector), 24 May 2024 at [44]. See Appendix A for SIF.

<sup>5</sup> At [46]. See Appendix B for SMP.

<sup>6</sup> Section 87F Report – Deborah Ryan (GHG), 15 March 2024 at [44].

<sup>7</sup> Statement of Evidence – Grant Telfar (Meridian and the Electricity Sector), 24 May 2024 at [95]. See also Planning JWS at pages 8-9, item 8. CC1 is at Appendix 23 to Section 87F Report – Planning, 15 March 2024.

- (b) Details of the management or minimisation of greenhouse gas emissions during construction, operation and at end of life of the wind farm.

[19] The condition is intended to require Meridian to provide a framework for considering GHGs as part of the Project. It was not intended to be highly detailed and thereby create an onerous reporting obligation, if that was a concern of Meridian. As I discuss below, I have recommended some changes to CC1 to make it clearer that the approach should be a formal requirement to integrate GHGs in making decisions and managing emissions similar to the SIF and the example SMP documentation that were provided with evidence by Meridian.

#### **E. CONDITIONS**

[20] I have reviewed the August Proposed Conditions. I am in agreement with the revised condition CC1. In particular, Condition CC1 provides certainty that the GHG management matters will form part of the considerations by Meridian when they are undertaking the design, procurement and construction phases, and it formalises alignment with the SIF and SMP approaches to managing GHG emissions as put forward by Meridian.

[21] I understand that subpart c) of CC1 aligns with the agreement noted in the Planning JWS that a condition on GHG matters, if included, should be as an annual reporting requirement.

#### **F. CONCLUSION**

[22] Subject to the inclusion of CC1, in my opinion, in meeting the condition Meridian will have sufficiently identified how it intends to incorporate lifecycle GHG emission matters into the Project. This addresses my concerns.

**23 August 2024**

**Deborah Ryan**