

18 May 2026

Winstone Pulp International
C/- Babbage Consultants Ltd
PO Box 2027
Shortland Street
Auckland 1140

Via email: Sukhi Singh - sukhis@babbage.co.nz
Cc: Chris Timbs - chris@berrysimons.co.nz
Mike Ryan - mike.ryan@wpinz.com
Paul Duder – pduder@babbage.co.nz

Dear Sukhi,

Additional information s 92 request for application APP-2006012018.02

Council has reviewed the revised application material lodged for APP-2006012018.02 received on 30 April 2026.

Based on our review of this material, Council requires further information under section 92 of the Resource Management Act 1991 to understand the nature of the revised proposal, the consents required, and to assess the actual and potential effects of the proposal.

1. *Condensate discharge and water quality / ecology*

- a. Confirmation of the final description of what is proposed to discharge to the Whangaehu River, including whether any stormwater component remains within the current application, or whether the discharge is entirely condensate, and the relative proportion of condensate derived from torrefaction and from the hot water boiler.
- b. At page 7 of the Planning Report and section 3.0 / Table 1 of the Water Quality Memo, the proposed condensate composition is summarised. The contaminants generated from combustion of wood chip (products of partial and complete combustion) appear to differ from the contaminants volatilised from wood during torrefaction (volatile and semi-volatile compounds with a boiling point less than the torrefaction temperature of approximately 300 °C). Please confirm whether the nature of the contaminants present in the condensate will also differ under the revised proposal?
- c. Technical Memo 1 indicates that the analytical results are for the condensate from biomass boiler flue gas at the Danish Polytechnik facility rather than condensate from the proposed torrefaction process. Please provide the following further information:

- i. Details of the difference in composition of condensate from the torrefaction process compared to condensate from a biomass boiler.
- ii. Justification of the selection of contaminants monitored in the biomass boiler condensate and their relevance to the condensate from torrefaction.
- iii. Whether there are particular contaminants associated with *Pinus radiata* torrefaction (e.g. from the higher terpene content) that may not be represented in the monitoring data from the Danish biomass boiler.
- d. Is it proposed to use Table 2 of the planning report as the basis for setting discharge quality limits?
- e. Zinc concentration appears quite elevated compared with other metals. Please provide an explanation as to the source / cause.
- f. What is the expected organic load (e.g. BOD₅) content of the discharge?
- g. At page 7 of the Planning Report, the condensate summary does not appear to include BOD. Is any further information available on BOD and any additional organic or aromatic parameters not clearly addressed in the lodged material?
- h. Please identify / evaluate any risk of effluent quality degradation and / or odour creation that may be caused by the discharge of potentially high-BOD wastewater into a wetland (risk of anoxia, change in pH, H₂S formation and discharge, etc.) prior to the discharge into the river.
- i. The Planning Report addresses water quality effects at pages 20-21 and section 107 at page 34, while the Water Quality Memo compares modelled downstream concentrations with Schedule 5 targets for Whau_1a. Please identify where, in the lodged material, the revised discharge has been assessed against the full One Plan water quality framework and any applicable restrictions under section 107 of the RMA or provide that assessment. Note that the condensate discharge from the Revised Proposal should be assessed on its own, rather than being compared to prior consented or proposed activities.
- j. Please provide a process flow diagram showing the key process elements/equipment, process streams of the torrefaction process and resulting discharges to the environment.

2. Earthworks associated with wetland construction

- a. At pages 8-10 of the Planning Report, the wetland concept design and associated construction works are described, including about 22,441 m³ of cut and fill over 17,146 m². The lodged material indicates that aspects of the wetland construction package remain subject to further design. Please confirm which elements of the wetland footprint, staging and cut / fill methodology are finalised, and which remain to be confirmed.

- b. The ESCP¹ at pages 4-7 appears to be relatively high level, and page 4 refers to “Horizon Regional Council Erosion and Sediment Control Guidelines.”² Please confirm the erosion and sediment control design standard that has been applied and identify which aspects of the erosion and sediment control (ESC) design are finalised and which remain subject to further design or construction methodology.
- c. The ESCP at pages 5-7 and the associated drawings appear to rely on a containment-based approach to runoff management within the work area, rather than a more conventional treatment and discharge device. Please provide the technical basis for that approach, including the assumptions made as to runoff containment, infiltration, storage, and management of any water retained on site during construction to show that treatment can be achieved to a similar or greater standard than a traditional ESC approach. Alternatively, please provide an ESCP in general accordance with Greater Wellington Regional Council’s Erosion and Sediment Control Guide for Land Disturbing Activities in the Wellington Region (February 2021).
- d. The ESCP at page 5 and the Planning Report at page 9 identify the existing pond within the wetland footprint and indicate that it will be filled as part of the works. Please clarify how any existing inflows to, and outflows from, that pond are proposed to be managed during construction of the new wetland.

3. *Earthworks associated with contaminated soil*

- a. At pages 17-18 of the Planning Report and in the DSI³ / RAP⁴ material, what contaminated material is expected to be excavated, shifted, reused, capped or otherwise managed during wetland construction? During the Teams call on Wednesday 13 May, we were advised that only a small part of the site contained contaminated material, and the wetland earthworks were clear of that part. Please confirm the extent to which contaminated material will be disturbed, excavated, shifted, reused, capped, or otherwise managed as part of the wetland construction works.
- b. If earthworks are to be undertaken with the contaminated material, could any contaminated soil or contaminated soil-laden water be discharged to land and / or water during the works, and if so, can the Applicant please demonstrate how that consenting pathway has been addressed, including the applicable rule references?
- c. If the earthworks are within the contaminated soil area as stated in the DSI/RAP material, please provide an explanation as to where the ordinary earthworks methodology ends and the contaminated material management begins, given the overlap between the Planning Report, DSI, RAP and ESCP?

¹ ESCP - Erosion and Sediment Council Plan

² No such document exists

³ DSI – Detailed Site Investigation

⁴ RAP – Remedial Action Plan

- d. In particular, please address if a separate Regional Council consent is required under the One Plan for any associated discharge of contaminated material or contaminated water. Any such consent should include a completed Form 9 and a corresponding AEE to enable assessment of the works.
- e. Council's preliminary view is that this activity may require a separate consent under LF-LW-R38 as a discretionary activity to address contaminants other than sediment. Does the Applicant consider that those matters are fully addressed by the current earthworks' application under page 11 of the Planning Report?

4. Contaminated soil investigations

- a. At the DSI executive summary (pp. i-ii) and regulatory / conclusion sections (pp. 19-23), are the DSI findings intended to be complete for the proposal now being advanced? The DSI should not be directed solely to the NESCS pathway but should also be considered within the broader Horizons / One Plan contaminated land and redevelopment context. Council's preliminary view is that the DSI is not yet sufficient to fully characterise contamination within the footprint of the proposed works or to support the proposed management approach, and that additional contaminated land investigation and assessment are required. Specifically, the full vertical extent of contaminants in soil proposed to be reused has not been fully characterised, particularly in areas where contamination (arsenic) and anthropogenic material has been identified.
- b. Per- and polyfluoroalkyl substances (PFAS) have historically been used in pulp processing, and these do not appear to have been considered as contaminants of potential concern in the DSI. Further assessment is required as to whether PFAS may be present within pulp material in the existing footprint, including confirmation as to whether PFAS or PFOA were used, stored, or otherwise present at the WPI site.
- c. What is the final contaminated footprint relevant to the wetland works, including the area associated with the zinc exceedance beneath the pond area identified in the DSI, and has the arsenic within that footprint been adequately characterised for the purposes of the proposed works? In Council's view, further work is required to adequately delineate and assess both the zinc exceedance and the arsenic issue within the footprint of the proposed works.
- d. At pages 3-5 of the Remedial Action Plan (RAP), what is the final remediation / management approach, including capping, any impermeable layer, validation, and is any further investigation still anticipated? How will this affect current and future consenting requirements?
- e. How is the RAP intended to operate alongside the wetland design and earthworks methodology described in the Planning Report at pages 8-10?

5. Groundwater matters

- a. At pages 8-9 of the Planning Report, the wetland is described as a vertical subsurface flow system with vertical percolation and infiltration media, while pages 4-5 of the RAP refer to

an impermeable layer to prevent downward infiltration into the former pond area. Is the proposed wetland lined, partly lined, or unlined? The plan indicates that the liner may be PVC or clay lined. Please confirm if the wetland is proposed to be lined or not and if so provide the proposed liner specification, including liner type, permeability, construction standard, and how the liner will prevent or minimise seepage from the wetland to land or groundwater.

- b. Is any seepage from the base of the wetland to land or groundwater intended, prevented, or incidental? Most 'lined ponds' leak to a greater or lesser extent so this will be an issue even if the ponds are lined. Based on the proposed liner specification, please provide an estimate of the likely range of seepage through the base of the wetland.
- c. It is our understanding that the Applicant considers the water encountered during site investigations to be "perched water" and not "groundwater." Please:
 - i. provide a definition of perched water;
 - ii. explain why it is not considered to be groundwater for the purposes of the One Plan, and why it is not subject to the groundwater rules of the One Plan.
 - iii. Based on the information provided in the revised application, describe the nature, location, extent, and significance of perched water at the site, and whether it will be affected by construction or operation of the proposed wetland.
- d. At pages 17-18 of the Planning Report, the Applicant notes that the original pond may represent groundwater ponding, and states that groundwater was encountered at depths of 0.8 to 1 m in the adjacent area. The proposed excavation will extend to 0.7–1 m below ground. Please:
 - i. Confirm the Applicant's current understanding of depth to groundwater at the site;
 - ii. confirm the Applicant's current understanding of likely groundwater flow direction at the site;
 - iii. confirm whether groundwater mounding has been considered;
 - iv. Explain how groundwater will be managed during construction and through the life of the wetland;
 - v. Provide an estimate of the volume of water likely to be intercepted, and confirm whether dewatering will be required during construction (including estimated dewatering volumes);
 - vi. Confirm whether dewatering will trigger any resource consent requirement under the One Plan; and
 - vii. Provide any available onsite monitoring data from monitoring bores, or explain whether such monitoring is proposed, to assist the Council's understanding of groundwater levels and local baseline groundwater quality
- e. Has any assessment been undertaken of groundwater quality effects, including the discharge of heated water to ground and any effect on any site supply bore, given there does not appear to be a standalone groundwater effects assessment in the revised application? As noted above in relation to condensate discharge/water quality, a site-

specific water quality assessment should be undertaken and consequently provided to the Council, particularly to understand whether the discharge is carbon rich, and could (depending on seepage amounts) affect groundwater redox conditions beneath the wetland.

6. *Air discharge*

- a. Has the Applicant compared the discharges authorised by the existing air discharge consent with the proposed discharges associated with the torrefaction process? If so, please provide that assessment. Following that assessment does the Applicant maintain that the future air consent pathway can be achieved by way of variation rather than by a new consent.
- b. In Technical Memo 1 and the Air Matters memo, what are the final air emission sources associated with the torrefaction process, including the wood chip drier, heat plant, hot water heater, Torr Gas burner and any discharge points? How does this fit under the existing consent and identify any changes between the two.
- c. At page 3 of the Air Matters memo, what technical work remains outstanding, including whether dispersion modelling has been completed or is still to be done?
- d. Has any greenhouse gas assessment been prepared, noting that the Planning Report at pages 12-13 and the Air Matters memo at pages 1-3 do not appear to contain a quantified greenhouse gas assessment?
- e. Please explain the basis on which the Applicant says the future air consent pathway does not affect the completeness of the wider project now before Council and provide an assessment supporting that position.

7. *Air Discharge / Wastewater Discharge interaction*

- a. What assumptions (e.g. wood composition, torrefaction process conditions, condenser temperature, etc) have been made about the partitioning of contaminants from the torrefaction and hot water boiler flue gas into the gas phase and condensate?
- b. What is the sensitivity of the discharge composition to these assumptions?
- c. Do changes in the management of the air discharges impact the condensate quality?

8. *Staging*

- a. The revised proposal includes a new building for the torrefaction plant at the northern end of the site. As currently understood, the wastewater discharge cannot be produced unless the torrefaction building is constructed and the torrefaction plant is operational. Please explain where the earthworks, dewatering, and related site works for the torrefaction building sit within the overall project sequencing. The response should explain how those works relate to the current wastewater discharge proposal, whether any physical works for the torrefaction building must occur before the proposed wastewater discharge can commence, whether those works are intended to be subject to a later application. If staging is proposed please explain how that staging aligns with the five-year term sought for the wastewater discharge consent.

- b. The revised package does not presently address any earthworks, dewatering, or related site works required for the torrefaction building. Based on the site visit, separate consent may be required for land disturbance under Rule LF-LAND-R6 as a controlled activity, any associated taking, use, diversion or discharge of water during dewatering, and any discharge of contaminated soil, contaminated water, or contaminated soil-laden water under Rule LF-LW-R38 as a discretionary activity. Please confirm what consents may be required for those works and when the Applicant intends to seek them.

9. Consent term

- a. Please confirm the consent term now sought for the revised proposal.
- b. If a five-year term is still sought, please explain how that term aligns with the proposed staging of the torrefaction building, wetland construction, commissioning, and commencement of the discharge.

10. Conditions

- a. Please confirm whether the Applicant proposes to retain the conditions of the existing consent, or whether revised conditions are now sought for the condensate discharge.

11. Scope

- a. The application as lodged and publicly notified sought to roll over the existing consent for the discharge of treated pulp wastewater for 5 years on the same conditions. Having regard to the revised proposal (including any revisions to the consent term and conditions sought), please explain how the Applicant considers the revised proposal to fall within the scope of the application as lodged and notified.

12. Consultation update

- a. Given the statutory acknowledgement framework and Te Waiū-o-Te-Ika context applying to Ngāti Rangi, please provide any specific comment or feedback received from Ngāti Rangi on the revised proposal, including the constructed wetland, discharge pathway, and any associated effects on freshwater, groundwater, cultural values, and wetland values. If no specific comment has been sought or received from Ngāti Rangi on the revised proposal, please confirm this and outline whether the Applicant intends to seek further comment from Ngāti Rangi.
- b. Please identify any specific comment or feedback received from any other submitter on the revised proposal, including whether any further engagement with submitters is proposed in relation to the revised proposal.

13. Outstanding Application Forms and Supporting Material

- a. Please provide a completed Form 9 application for the earthworks consent now identified being sought, including the activity description, site details, owner / occupier details, consent type, and all relevant supporting information required under section 88 and

Schedule 4 of the Resource Management Act 1991. This should include other activities that may be permitted or require resource consent at the site.

- b. Should your responses to questions in this letter identify that further consents are required, please ensure that the Form 9 and all relevant supporting information required under section 88 and Schedule 4 of the Resource Management Act 1991 are provided.

14. Additional Resource Consents

- a. Based on the revised proposal, the following activities have been identified as potentially requiring additional resource consents:
 - i. any additional discharge consent(s) associated with the wastewater discharging through the base of the proposed wetland / groundwater pathway.
 - ii. any additional discharge consent(s) associated with contaminated soil, contaminated water, or contaminated soil-laden water under the One Plan; and
 - iii. any consent(s) required for earthworks, dewatering, discharges, or other site works associated with construction of the torrefaction building; and
 - iv. The future air discharge consent pathway, which is not presently before Council and, on the material lodged, may require a new consent rather than a variation.

For each of the above, please confirm whether the Applicant agrees a separate consent is required, and if not, the reasons for that position.

- b. Please then provide a complete schedule of all consents required to implement the revised proposal in the form of a table addressing the following for each consent:
 - i. whether or not consent is sought as part of the current application;
 - ii. if not, the reasons and the anticipated timing for lodgement of the future application;
 - iii. what further information, design details, technical assessment, rule analysis, or process steps are still required to enable assessment of that consent.

Under the Resource Management Act, the Applicant must, within 15 working days of the date of this letter, take one of the following options:

- a. provide the information requested; -OR-
- b. confirm in writing that the Applicant agrees to provide the information in which case a reasonable timeframe for provision of that information will be agreed; -OR-
- c. confirm in writing that the Applicant refuses to provide the information.

If the information is not provided, the application may proceed based on the information available, including any further procedural directions from the Hearing Panel.

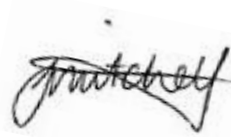
If you have any questions regarding the determination or wish to discuss any aspects of this letter, please contact our office on 0508 800 800.

Yours sincerely,



Fiona Morton
CONSULTANT SENIOR CONSENTS
PLANNERHORIZONS REGIONAL COUNCIL

APPROVED by,



Jasmine Mitchell
TEAM LEADER CONSENTS
HORIZONS REGIONAL COUNCIL