
**BRIEF OF SECOND SUPPLEMENTARY EVIDENCE OF HANNAH LOUISE GOSLIN
AIR (MINERAL EXTRACTION)**

Qualifications and Experience

- 1 My qualifications and experience are set out in paragraphs [5] to [7] of my Section 42A report titled *Chapter 7: AIR - Air* and dated 27 April 2022.

Code of Conduct

- 2 I have read and agree to comply with the Environment Court's Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023. I have complied with the Code in preparing my evidence. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of Evidence

- 3 On 27 January 2023, the Hearing Panel directed in Minute 5:¹
- "...s.42A report writers to reconsider whether to advance potential amendments to various affected chapters of the pOPRS to address effects arising from any potential consent pathway for mineral extraction activities, in response to evidence advanced by Claire Hunter for Oceana Gold (NZ) Limited"*.
- 4 This supplementary statement of evidence provides my response to the amendments sought by Ms Claire Hunter for Oceana Gold Limited (OGL) to AIR-P4 and AIR-M2 which are discussed in paragraphs 9.1 to 9.3 of Ms Hunter's evidence-in-chief.

AIR-P4 and AIR-M2

- 5 Ms Hunter seeks amendments to AIR-P4, particularly the latter part of the policy which states *"...and avoid, as the first priority, discharges to air that cause offensive or objectionable effects."* Ms Hunter's evidence states that AIR-P4 is too limiting and

¹ <https://www.orc.govt.nz/media/13760/minute-5-directions-issued-orally-by-the-panel-during-hearing-week-one.pdf>

relies on a subjective assessment being made in any given circumstance.² Ms Hunter seeks AIR-P4 is amended to remove the phrase “as the first priority” and provide the option to “remedy or mitigate” discharges that cause offensive and objectionable effects in addition to “avoid”. Subsequent amendments are also sought by Ms Hunter in AIR-M2 clause (1) to implement the relief sought in AIR-P4.

- 6 At the hearing on 10 February 2023, Ms Hunter discussed her concerns with AIR-P4. Ms Hunter’s key concern was that AIR-P4 requires complete avoidance of the activity to avoid a discharge to air causing offensive or objectionable effects.
- 7 The concerns raised by Ms Hunter in evidence and at the hearing are consistent with those raised by a number of other submitters.³ In the context of the specific relief sought by Ms Hunter, I do not consider that avoid as the first priority requires complete avoidance of an activity. I consider that “avoid as the first priority” emphasises “avoid” in “avoid, remedy or mitigate” enabling the future Regional Air Plan to determine the appropriate management response. It indicates a standard higher than “avoid, remedy or mitigate”, but lower than “avoid” without qualification. Based on this, I do not agree with Ms Hunter’s relief.
- 8 As indicated at the hearing and following the presentation of evidence, I consider there is further drafting required to clarify the intent of AIR-P4 and I will address this in the Council Reply Report.



Hannah Louise Goslin

24 February 2023

² Dated 23 November 2022

³ For example James Taylor (Dunedin City Council) para 16; Lynette Wharfe (Horticulture New Zealand) para 49; Steve Tuck (Silver Fern Farms) para 6.7; Susannah Tait (Fonterra) para 9.17.