IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of **PROPOSED PLAN CHANGE 1** to the Waikato Regional Plan – hearing of **BLOCK 1** topics
AND	
IN THE MATTER	of the hearing of the further submission by **WAIKATO REGION TERRITORIAL LOCAL AUTHORITIES COMPRISING THE WARTA GROUP** in relation to **BLOCK 1** topics

SUPPLEMENTARY STATEMENT OF EVIDENCE OF MARY ELIZABETH O'CALLAHAN

1. INTRODUCTION

1.1 My name is Mary Elizabeth O'Callahan. I have outlined my qualifications, experience and commitment to comply with the Environment Court Expert Witness Code of Conduct in my evidence in chief.

1.2 I have read the statement of evidence of Mr Paul Ryan for Hamilton City Council and discussed issues with him. As a result, the purpose of this supplementary evidence is to amend relief that the WARTA member councils now seek in relation to Objective 3 of this.

2. OBJECTIVE 3 - THE RELIEF PREVIOUSLY SOUGHT

2.1 In my evidence in chief, I expressed concerns in relation to Objective 3; in particular that the water quality attributes referenced within the objective (i.e. Table 3.11-1) might be applied at the point of discharge, without mixing, rather than in a state of environment manner at the specified monitoring locations.

2.2 Accordingly, I recommended the following amendment to Objective 3 (additions to Officers' recommended wording underlined):

> *"Actions put in place and implemented by 2026 to reduce diffuse and point source discharges of nitrogen, phosphorus, sediment and microbial pathogens, are sufficient to achieve the short-term water quality attribute states in Table 3.11-1, as measured at the identified state of the environment monitoring sites."*

2.3 Since submitting my evidence, I have discussed this proposed amendment with Mr Ryan and identified a shortcoming in the relief I originally recommended in my evidence in chief. To explain, the wording that I recommended does not recognise the time lag between actions taken and consequent improvement in the receiving water quality. As such, it implies that short term actions must result in the meeting of the short term goals at or before 2026, whereas I understand that this was not the intention of PC1. Rather, the intention for the short term period was that actions were put in place by the stated date, while acknowledging that the achievement of the goals may take longer, due to lag effects. My previous wording could be interpreted as not recognising the lag.

3. THE RELIEF NOW RECOMMENDED

3.1 Having considered the issues with Objective 3 further, I recommend the following revised wording, which recognises my earlier evidence on the need to specify a monitoring location and better reflects the lag issue. Changes to the Officer's recommended wording for Objective 3 are indicated with underlining and strikeout text below.

> *"Actions are put in place ~~and implemented~~ by 2026 to reduce ~~diffuse and point source~~ discharges of nitrogen, phosphorus, sediment and microbial pathogens that are sufficient to achieve the short term water quality ~~attribute states~~ goals in Table 3.11-1, as measured at the identified state of the environment monitoring sites. This objective applies to diffuse and point source discharges (in the case of existing point source discharges, only when consents are renewed). It is recognised there may be a lag between taking action and the receiving water quality improving so the short term water quality goals may not necessarily be achieved by 2026."*

3.2 The new wording also takes account of Hamilton City Council's submission point that PC1 it not intended to generate a consent review process when it is made operative, i.e. WRC will wait for existing consents to expire and renewal applications to be lodged before applying the metrics. I understand this is the intention as per explanatory text within PC1[1].

[1] 3.11 Background and explanation section, page 15; 3.11.2 Reasons for Objective 3, page 29

3.3 Other than the above amendment to my recommended wording for Objective 3, my evidence in chief is unchanged.

Mary O'Callahan
18 March 2019