

**Before Independent Commissioners Appointed by the Canterbury
Regional Council**

In the matter of	The Resource Management Act 1991
And	
In the matter of	Applications by Oceania Dairy Limited for all consents necessary for the construction of a 7.5 kilometre pipeline and discharge of treated wastewater from a milk-processing factory situated at 30 Cooney's Road, Glenavy, into the Coastal Marine Area.

JOINT WITNESS STATEMENT-Coastal hazard experts

DATED: 14 July 2020

Introduction

1. This Joint Witness Statement (JWS):
 - a. Relates to the assessment against effects on coastal hazards that may arise from Oceania Dairy Limited's proposal to construct a 7.5 kilometre pipeline and discharge treated wastewater from a milk-processing factory situated at 30 Cooney's Road, Glenavy, into the Coastal Marine Area.
 - b. Reports on the outcome of expert conferencing between the coastal hazard experts who have filed evidence in this matter.
2. The expert conference was held in the afternoon of 14 July 2020, via Skype phone conference. In attendance was Mr. Bruce Gabites (Canterbury Regional Council), Mr. Suman Khareedi and Mr. Lobo Coutinho (Babbage Consultants Limited). Ms. Kelly Walker, Reporting Officer for Canterbury Regional Council, attended to take minutes only.
3.
 - a. The witnesses acknowledge that the JWS is to clearly record the issues agreed and not agreed, between them. Succinct reasons are to be captured in the JWS. This will assist all parties and the decisionmakers in focussing on the matters that remain in dispute and the significance of them;
 - b. Expert conferencing is not a forum in which compromise or a mediated outcome between the experts is anticipated. Unlike mediation, the "aim" is not resolution. Rather, the aim is clear identification of and narrowing of points of difference.

Points discussed

1. As stated in the evidence of Mr. Coutinho, the coastal environment in the vicinity of the proposed pipeline is very dynamic, and is currently subject to ongoing coastal erosion. However, risk of tsunami inundation is low due to the presence of the cliffs. Mr. Gabites agrees with this assessment.
2. Mr. Coutinho states that the proposed outfall construction methodology (micro-tunnelling approximately 300 metres back from the cliff) does not involve setting up any permanent or temporary structures on the beach system that would meaningfully affect coastal processes. Mr. Gabites agrees with this assessment.
3. Mr. Coutinho states in his evidence that the pipeline should not be exposed by coastal erosion within the next 100 years, even if erosion rate doubled from the current rate. Mr. Gabites agrees with this assessment and stated that at the depths the pipeline is to be buried at below the ground surface, that it is also unlikely that the pipeline will have any significant impact on coastal processes.
4. The experts discussed erosion of the northern side of gully due to building the access road. Mr Gabites stated that during the mechanical construction of the haul road and subsequent movements of plant and equipment to the beach, there may still be some erosion within the gully. Mr. Coutinho noted that MGI Irrigation are finishing their earthworks at the moment (as was proposed to be done in his evidence) to change

from channels to pipeline, and capping the end of the race will significantly reduce the amount of water flowing down the gully, which will subsequently reduce erosion in the gully. Mr. Gabites agrees that capping the irrigation race will likely reduce erosion on the northern side gully due to the decrease in flowing water.

5. The experts discussed the proposed survey of structures condition (CRC201190 Condition #15). Conditions require inspection once per year for five years plus after any significant tsunami event, then five yearly after this if there are no changes. Experts agree this was suitable monitoring of the structures and that "significant" does not need to be defined in the conditions.
6. The experts also discussed CRC201190 Conditions #16 and #18, relating to visual inspection of the beach. Experts agree that six monthly visual inspection is suitable but that #18.c could be removed as this refers to a natural process rather than an effect of the pipeline, or reworded that beach weakness or gravel washout is reported to Canterbury Regional Council rather than as currently worded: "should be repaired or removed".



Mr. Lobo Coutinho



15/7/2020

Mr. Bruce Gabites



Mr. Suman Khareedi

