

**Before Independent Commissioners Appointed by the Canterbury Regional
Council and Selwyn District Council**

In the matter of The Resource Management Act 1991

And

In the matter of Applications by **Fulton Hogan Limited** for all
resource consents necessary to establish, operate,
maintain and close an aggregate quarry (**Roydon
Quarry**) between Curraghs, Dawsons, Maddisons
and Jones Roads, Templeton

**REBUTTAL EVIDENCE OF AUDREY WAGENAAR ON BEHALF OF
FULTON HOGAN LIMITED**

DR FITCH EVIDENCE

DATED: 30 OCTOBER 2019

Counsel Acting: David Caldwell

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Introduction

1. My full name is Audrey Kathleen Wagenaar. I am an Associate and a Senior Environmental Scientist at Golder Associates Ltd.
2. I have previously provided a written brief of evidence in relation to the Roydon Quarry Proposal. That evidence is dated 23 September 2019. I confirm my qualifications and experience as set out in paragraphs 5 to 15 of that evidence.
3. I also confirm I have read and agree to comply with those parts of the Environment Court Practice Note that bear on my role as an expert witness, in accordance with paragraph 7 of my earlier evidence.

Scope

4. My supplementary rebuttal evidence addresses human health issues raised in the evidence filed by Dr Fitch on behalf of N and A McGrath. In particular, my evidence is complementary to that of Dr Jorgensen.

Evidence of Dr Fitch

5. Throughout his statement, Dr Fitch refers to various aspects of human health in order to draw parallels with equine health.
6. I cannot knowledgeably comment on the similarity of the equine model of asthma to the human health model of asthma, as my field of expertise is human health toxicology and risk assessment, not equine health. However, I accept that the equine model could be a potential model for the human syndrome based on the statements of Dr Jorgensen and Dr Fitch.
7. If that is the case, I would support Dr Jorgensen's suggestion that air quality criteria for humans would then be a reasonably conservative surrogate for the protection of equine health – put another way, the human health air quality criteria would be sufficiently robust to also protect equine health.

Audrey Wagenaar

30 October 2019