

In the matter of the Resource Management Act 1991

And

In the matter of an application for Resource Consents by Oceania Dairy Limited to construct and operate a pipeline to discharge treated wastewater into the ocean.

STATEMENT OF EVIDENCE OF SIMON WEST

28/05/2020

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INTRODUCTION

- 1 My full name is Simon West. I am an Associate with Babbage Consultants Limited, employed as a senior marine ecologist of Bioresearches (a Babbage company), specialising in benthic ecology of intertidal to continental shelf environments. I have a Bachelor of Science with Majors in both Biology and Earth Science from the University of Waikato, and a Master of Science with Honours in Zoology from the University of Auckland (1991). I have been employed by Bioresearches since April 1991.

- 2 During that time, I have undertaken ecological assessments in a wide range of habitats throughout New Zealand (Whangarei to Tiwai near Bluff) in a variety of habitat types (continental shelf and coastal subtidal and intertidal areas to north island rivers lowland forests). For the past 29 years, my principal area of responsibility regarding field assessments has been the marine ecology aspects of various development proposals and ongoing monitoring of effects, including appearing as an expert witness for Council, Environmental Protection Authority and Environment Court Hearings, and Environmental Protection Authority and Environment Court mediation.

- 3 I advise that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and to the extent that I am giving expert evidence, have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise and I have not omitted material facts known to me that might alter or detract from my evidence. Other than when I state I am relying on the advice of any other person, this evidence is entirely within my area of expertise.

EVIDENCE

- 4 I was responsible for designing the benthic biota and sediment quality sampling programme. This included defining the numbers of samples, sample locations, and testing parameters. I reviewed the technical report produced by Annabelle Coates, and provided advice.

- 5 I have visited the shoreline adjacent to the proposed discharge location and made assessments of the intertidal habitat.

- 6 I have reviewed the evidence of Annabelle Coates and have provided comment to her regarding benthic biota and sediment quality monitoring studies and interpretation of results, with regard to determining differences.

7 I am happy to answer any questions which the Commissioners may have with respect to the monitoring of effects to the benthic biota and sediment quality of the discharge location.

Simon West

28/05/2020