

**BEFORE THE ENVIRONMENT COURT  
I MUA I TE KOOTI TAIAO O AOTEAROA**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of appeals under Clause 14 of the First Schedule of the Act

**BETWEEN** **TRANSPOWER NEW ZEALAND LIMITED**  
(ENV-2018-CHC-26)

**FONTERRA CO-OPERATIVE GROUP**  
(ENV-2018-CHC-27)

**HORTICULTURE NEW ZEALAND**  
(ENV-2018-CHC-28)

*(Continued next page)*

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**SUPPLEMENTARY STATEMENT OF EVIDENCE OF MATTHEW  
MCCALLUM-CLARK ON BEHALF OF THE SOUTHLAND REGIONAL  
COUNCIL**

**TOPIC B OVERVIEW**

**28 October 2021**

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Judicial Officer: Judge Borthwick

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**WYNNWILLIAMS**

**ARATIATIA LIVESTOCK LIMITED**  
(ENV-2018-CHC-29)

**WILKINS FARMING CO**  
(ENV-2018-CHC-30)

**GORE DISTRICT COUNCIL, SOUTHLAND DISTRICT  
COUNCIL & INVERCARGILL DISTRICT COUNCIL**  
(ENV-2018-CHC-31)

**DAIRYNZ LIMITED**  
(ENV-2018-CHC-32)

**H W RICHARDSON GROUP**  
(ENV-2018-CHC-33)

**BEEF + LAMB NEW ZEALAND**  
(ENV-2018-CHC-34 & 35)

**DIRECTOR-GENERAL OF CONSERVATION**  
(ENV-2018-CHC-36)

**SOUTHLAND FISH AND GAME COUNCIL**  
(ENV-2018-CHC-37)

**MERIDIAN ENERGY LIMITED**  
(ENV-2018-CHC-38)

**ALLIANCE GROUP LIMITED**  
(ENV-2018-CHC-39)

**FEDERATED FARMERS OF NEW ZEALAND**  
(ENV-2018-CHC-40)

**HERITAGE NEW ZEALAND POUHERE TAONGA**  
(ENV-2018-CHC-41)

**STONEY CREEK STATION LIMITED**  
(ENV-2018-CHC-42)

**THE TERRACES LIMITED**  
(ENV-2018-CHC-43)

**CAMPBELL'S BLOCK LIMITED**  
(ENV-2018-CHC-44)

**ROBERT GRANT**  
(ENV-2018-CHC-45)

**SOUTHWOOD EXPORT LIMITED, KODANSHA  
TREEFARM NEW ZEALAND LIMITED, SOUTHLAND  
PLANTATION FOREST COMPANY OF NEW ZEALAND**  
(ENV-2018-CHC-46)

**TE RUNANGA O NGAI TAHU, HOKONUI RUNAKA,  
WAIHOPAI RUNAKA, TE RUNANGA O AWARUA & TE  
RUNANGA O ORAKA APARIMA**  
(ENV-2018-CHC-47)

**PETER CHARTRES**  
(ENV-2018-CHC-48)

**RAYONIER NEW ZEALAND LIMITED**  
(ENV-2018-CHC-49)

**ROYAL FOREST AND BIRD PROTECTION SOCIETY  
OF NEW ZEALAND**  
(ENV-2018-CHC-50)

**Appellants**

**AND**

**SOUTHLAND REGIONAL COUNCIL**

**Respondent**

## Introduction

- 1 My full name is Matthew Eaton Arthur McCallum-Clark.
- 2 My qualifications and experience are set out in my evidence in chief dated 22 October 2021.
- 3 I have been engaged by the Southland Regional Council (**Council**) to prepare evidence for these proceedings.

## Code of Conduct

- 4 I confirm that I have read the Code of Conduct for expert witnesses as contained in the Environment Court Practice Note 2014. I have complied with the Code of Conduct when preparing my written statement of evidence and will do so when I give oral evidence.
- 5 The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence. The reasons for the opinions expressed are also set out in my evidence.
- 6 Other than where I state I am relying on the evidence of another person, my evidence is 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

- 7 This evidence responds to the direction in paragraph [6] of the Record of Pre-hearing Conference Timetable Directions (Topic B) dated 22 October 2021. Paragraph [6] requires Council to identify the evidence that it relies on to inform its view on the current state of the environment, confirm whether this is consistent with the joint witness statements (**JWS**) filed in 2020, and if this is to be supplemented, the Council is to give a broad overview of new evidence to be called.<sup>1</sup>

## State of the Environment

- 8 After conferring with Council staff, I can confirm that:

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<sup>1</sup> Paragraph [6] reads: *[6] When filing its Topic B Overview Evidence on 22 October 2021, the Regional Council will identify the evidence that it relies on to inform its view on the current state of the environment. I understand this will largely be contained in the joint witness statements (JWS) filed in 2020 and if this is to be supplemented, the Regional Council will give a broad overview of new evidence to be called.*

- (a) While additional monitoring and analysis has been undertaken since the JWS were filed, the conclusions arrived at in the JWS remain valid. Essentially, the more recent monitoring confirms the conclusions of the JWS. Therefore, the Council will not be calling additional evidence specifically on the state of the environment, as the Council considers that the JWS can be relied upon.
- (b) While Council does not intend to call evidence specifically on human health and swimming sites, Council staff noted that the JWS does not directly address this issue. For the avoidance of doubt on this issue, there are eight freshwater swimming sites monitored by the Council in Southland,<sup>2</sup> and all eight are on the LAWA website.<sup>3</sup> Six of these sites are categorised as “poor”, which is below the national bottom line set out in Table 22 of the National Policy Statement for Freshwater Management 2020; and two currently have insufficient data to make an assessment.
- (c) Additional analysis work on freshwater quality has been undertaken for the Council’s People Water and Land programme. This programme has analysed some information in different ways to the JWS<sup>4</sup>. However, the overall conclusions of that work are consistent with the conclusions of the JWS.<sup>5</sup>

**DATED** this 28<sup>th</sup> day of October 2021

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**Matthew McCallum-Clark**

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<sup>2</sup> Aparima River at Thornbury, Mataura River at Gore, Mataura River at Riversdale, Mataura River at Mataura, Waikaia River at Waikaia, Oreti River at Winton Bridge, Oreti River at Wallacetown and Waiau River at Tuatapere.

<sup>3</sup> Available at “<https://www.lawa.org.nz/explore-data/swimming/>”

<sup>4</sup> For example, with the use of some different indicators and river classifications in the Draft Murihiku Southland Freshwater Objectives Report at “<https://waterandland.es.govt.nz/about/values-and-objectives/>”

<sup>5</sup> Available at “<https://waterandland.es.govt.nz/>”