

**From:** [Bridgette Malcon](#)  
**To:** [RPS](#)  
**Cc:** [Benjamin Murray \(bmurray@graymont.com\)](mailto:bmurray@graymont.com)  
**Subject:** Proposed Otago Regional Policy Statement Further Submissions - Graymont (NZ) Limited  
**Date:** Friday, 12 November 2021 12:49:54 p.m.  
**Attachments:** [image001.jpg](#)  
[image002.jpg](#)  
[image003.jpg](#)  
[T2021-086\\_BMM\\_12112021\\_Graymont NZ Limited Further submissions to the Proposed Otago RPS-final.pdf](#)

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Good afternoon,

Please find the further submissions of Graymont (NZ) Limited to submissions lodged to the proposed Otago Regional Policy Statement 2021.

Please confirm receipt of the same by return e-mail.

Please note that the attached further submissions will be served on primary submitters within five working days.

Thank you and kind regards

Bridgette



**Bridgette Munro**

Director

027 440 7663 | [enspire.co.nz](https://enspire.co.nz)



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## Further Submissions for Proposed Otago Regional Policy Statement 2021

**To:** Otago Regional Council,  
Private Bag 1954,  
DUNEDIN 9054

**Attn:** Otago Regional Council Policy Team

**By email:** [rps@orc.govt.nz](mailto:rps@orc.govt.nz)

**Submission on:** Further Submissions for Proposed Otago Regional Policy Statement (hereafter referred to as 'the pORPS')

**Name:** Graymont (NZ) Limited

**Address:** Graymont (NZ) Limited  
4/214 Collingwood Street  
Hamilton Lake  
**Hamilton**

**Attention:** Mr. Benjamin Murray

**Phone:** (09) 222 4323 or 021 714 926

**E-mail:** [bmurray@graymont.com](mailto:bmurray@graymont.com)

**Signature:**

Mr. Benjamin Murray  
HSE Manager, APAC South - Graymont (NZ) Limited

**Date:** 12<sup>th</sup> of November 2021

Form 6

Further submission in support of, or in opposition to, submission on notified  
proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 5pm on Friday 12 November 2021, and by original submitters within 5 working days of service on ORC)

To: Otago Regional Council

1. Name of person making further submission

Graymont (NZ) Limited

2. This is a further submission on the Proposed Otago Regional Policy Statement 2021.

3. I am:

	A person representing a relevant aspect of the public interest. In this case, also specify the grounds for saying that you come within this category; or
✓	A person who has an interest in the proposal that is greater than the interest the general public has. In this case, also explain the grounds for saying that you come within this category; or
Grounds:	Graymont (NZ) Limited owns and operates the Makareao Plant and Quarry within the Otago Region.
	The local authority for the relevant area.

4. I wish to be heard in support of my further submission.

5. If others make a similar submission, I will consider presenting a joint case with them at a hearing.

6. Further Submitter Details

a. Signature of person making further submission

(or person authorised to sign on behalf of submitter. A signature is NOT required if you make your submission by electronic means).

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b. Signatory name, position, and organisation

Name: Benjamin Murray

Position: HSE Manager, APAC South

Organisation: Graymont (NZ) Limited

**c. Date**

12<sup>th</sup> of November 2021

**Address for service of person making further submission**

**d. Contact person**

Benjamin Murray

**e. Email:**

bmurray@graymont.com

**f. Telephone:**

021714926

**g. Postal address:**

Graymont (NZ) Limited,  
4/212 Collingwood Street,  
Hamilton 3204

Graymont (NZ) Limited's ('Graymont' or 'GL') further submission is:

Graymont supports in part the submission of:

<b>Submitter:</b> Waitaki District Council ('WDC') <b>Submitter ID:</b> 00140 <b>Contact Person:</b> Victoria van der Spek <b>Address for Service:</b> <a href="mailto:vvanderspek@waitaki.govt.nz">vvanderspek@waitaki.govt.nz</a>
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The particular parts of the submission that Graymont supports are:

Original Submission Point number	Relevant Provision / Submission Point	Support or Oppose	Reasons	Relief sought by Graymont (NZ) Limited
00140.014	<p>SRMR - I10 SRMR - Significant resource management issues for the region.</p> <p>WDC seek the following:</p> <ul style="list-style-type: none"> <li>Amend to include reference to carbon forestry as a resource management issue for Otago (p.83).</li> <li>Include a greater recognition of mining operations in the Otago region and their contribution towards social and economic wellbeing.</li> <li>Recognise the Macraes Mine special zoning under the Waitaki District Plan within the PRPS.</li> </ul>	Support in part.	<p>Graymont supports that part of WDC's submission that seeks to:</p> <ul style="list-style-type: none"> <li>Include a greater recognition of mining operations in the Otago region and their contribution towards social and economic wellbeing.</li> <li>Recognise the Macraes Mine special zoning under the Waitaki District Plan within the PRPS.</li> </ul> <p>Graymont notes that the Otago mining sector makes an important contribution to the Otago Region and to New Zealand as a whole. While minerals and aggregates are a commodity upon which a variety of industries and organisations depend, their importance to regional economies is not always fully appreciated. In this regard, in addition to mining and supplying essential product, mineral extraction and processing activities create a large number of jobs within the Otago Region, both directly through mining and processing and indirectly, which in turn brings about wider benefits to the Region.</p> <p>Further, Graymont is of the opinion that economic wellbeing considerations are interwoven with the concept of sustainable management of natural and physical resources, as prescribed within section 5 of the Resource Management Act 1991 (the 'Act' or the 'RMA'). For example, due to the significance of minerals and aggregate in building and infrastructure, Graymont considers that enabling the extraction of locally sourced low-cost minerals and aggregate is important to the economic wellbeing and the efficient use and development of</p>	That submission number 0014.014 be accepted.

			resources within the Otago Region. In addition, the Company highlights that those lower prices in turn reduce the cost for building, infrastructure and other projects, which enables people and communities to provide for their social and economic wellbeing.	
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**Graymont (NZ) Limited's further submission is:**

Graymont supports in part the submission of:

**Submitter:** Straterra - Natural Resources of New Zealand ('SNRNZ')  
**Submitter ID:** 00019  
**Contact Person:** Jeremy Harding  
**Address for Service:** [jeremy@straterra.co.nz](mailto:jeremy@straterra.co.nz)

The particular parts of the submission that Graymont supports are:

Original Submission Point number	Relevant Provision / Submission Point	Support or Oppose	Reasons	Relief sought by Graymont (NZ) Limited
00019.001	Mineral extraction GEN - General Submission  SNRNZ seek the following: <ul style="list-style-type: none"> <li>Amend the RPS21 to allow for extractive activities to access the Effects Management Hierarchy and offer biodiversity offsetting and compensation as a consenting pathway for development to occur.</li> </ul>	Support	Graymont notes that mineral extraction activities by their very nature can result in adverse effects. As extraction activities are defined by the location of minerals, and can only occur in the location where the mineral resource is present, ensuring that these effects can be remedied, mitigated offset or may be compensated for is fundamental to the continued operation and development of such activities.  Graymont operates the Makareao plant and quarry which is located in North Otago. Graymont's products have proven essential for mitigating a multitude of natural and man-made environmental impacts, while at the same time remaining indispensable for vital industrial processes. Graymont records that the value of retaining local supply of its products has become even clearer during the Covid-19 pandemic, in this respect, with the disruption of supply chains globally, having local supply of lime products to provide for clean drinking water, environmental water treatment, construction products is essential.	That submission number 00019.001 <b>be accepted.</b>
00019.003	Mineral extraction GEN - General Submission  SNRNZ seek the following: <ul style="list-style-type: none"> <li>Amend the RPS21 to recognise that mineral extraction, like infrastructure, is locally constrained.</li> </ul>	Support		That submission number 00019.003 <b>be accepted.</b>
00019.004	Mineral extraction GEN - General Submission  SNRNZ seek the following: <ul style="list-style-type: none"> <li>Amend the RPS21 to allow for mineral extraction, as a functionally constrained industry, to access the effects management hierarchy - whether in an SNA or not.</li> </ul>	Support	Further, due to the significance of minerals and aggregate in building and infrastructure, Graymont considers that enabling the extraction of locally sourced low-cost minerals and aggregate is important to economic wellbeing and the efficient use and development of resources. In addition, the Company highlights that those lower prices in turn reduce the cost for building, infrastructure and other projects, which enables people and communities to provide for their economic wellbeing.	That submission number 00019.004 <b>be accepted.</b>

			Given these reasons Graymont consider it is important that the pORPS explicitly recognise the functional, locational and operational needs of mineral extraction, and as such, that the effects management hierarchy should be employed accordingly.	
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**Graymont (NZ) Limited's further submission is:**

Graymont supports in part the submission of:

**Submitter:** Aggregate and Quarry Association ('AQA')  
**Submitter ID:** 00015  
**Contact Person:** Wayne Scott  
**Address for Service:** [wayne@aqa.org.nz](mailto:wayne@aqa.org.nz)

The particular parts of the submission that Graymont supports are:

Original Submission Point number	Relevant Provision / Submission Point	Support or Oppose	Reasons	Relief sought by Graymont (NZ) Limited
00015.002	General GEN - General Submission  AQA seek the following: <ul style="list-style-type: none"> <li>Amend the RPS21 to address the issue of reserve sensitivity, through providing planning direction for key resource areas to protect existing and future quarries from the encroachment of non - compatible land uses, such as urban expansion and rural lifestyle developments, reducing the potential for reserve sensitivity effects to occur.</li> </ul>	Support	Graymont considers that the pORPS should recognise that mineral extraction and quarrying activities can only occur in that location where the mineral resource is present.  Graymont records that the pORPS does not currently contain provisions that specifically promote the responsible use of minerals. The Company is primarily concerned to ensure that existing and possible future extraction of minerals and quarrying activities are not compromised by incompatible activities being established or establishing near to those resources.  Graymont considers that the importance of minerals should be addressed within specific objectives and policies in the pORPS, particularly as, a sustained supply of minerals is essential to the continued development of the Otago Region. Graymont notes that this, in turn, would enable mineral specific provisions to be reflected in regional and district plans and for local authorities to find policy support in the ORPS for recognising the benefits derived from mineral extraction and quarrying activities; addressing potential 'reverse sensitivity' issues; and other issues such as those associated with the locational needs for mineral extraction and quarrying activities and the management of adverse effects from mineral extraction and quarrying activities.	That submission number 00015.002 <b>be accepted.</b>
00015.001	Mineral extraction GEN - General Submission  AQA seek the following: <ul style="list-style-type: none"> <li>Amend the RPS21 to recognise that quarrying is both a functionally and operationally constrained activity and that quarry resources need to be protected.</li> </ul>	Support		That submission number 00015.001 <b>be accepted.</b>
0001500.003	ECO - P4 ECO - Ecosystems and Indigenous Biodiversity	Support	Graymont records that mineral extraction and processing activities are locationally, functionally and operationally	That submission number 00015.001 <b>be accepted.</b>

	<p>AQA seek the following: Amend as follows:</p> <ul style="list-style-type: none"> <li>(1) the development or upgrade of nationally and regionally significant infrastructure <u>and mineral extraction</u> that has a functional or operational need to locate within the relevant significant natural areas(s) or where they may adversely affect indigenous species and ecosystems that are taoka...</li> </ul>		<p>constrained by the resource that they utilise. Given this, while the Company both acknowledges and agrees that it is appropriate to protect important biodiversity values, it considers that use of the effects management hierarchy will assist in enabling mineral extraction within Significant Natural Areas where the effects of the same can be appropriately managed.</p>	
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Graymont (NZ) Limited's further submission is:

Graymont supports in part the submission of:

**Submitter:** Mokihinui Gold Ltd ('MGL')  
**Submitter ID:** 00002  
**Contact Person:** Graeme Hutchins  
**Address for Service:** [nevisnugget@gmail.com](mailto:nevisnugget@gmail.com)

The particular parts of the submission that Graymont supports are:

Original Submission Point number	Relevant Provision / Submission Point	Support or Oppose	Reasons	Relief sought by Graymont (NZ) Limited
00002.002	<p>New provision GEN - General Submission</p> <p>MGL seek the following: New Policy X.X.1</p> <ul style="list-style-type: none"> <li>Manage activities in rural areas and support the region's economy and communities, by: <ul style="list-style-type: none"> <li>a) Enabling primary production and other rural activities that support that production;</li> <li>b) Providing for mineral exploration, extraction and processing;</li> </ul> </li> </ul>	Support	<p>Graymont has proposed some provisions within its primary submission, and while it prefers its own requested provisions the Company generally supports provisions for mineral exploration, extraction and processing such as those proposed by MGL and notes that the pORPS does not currently contain any specific provisions for such activities, which is of concern.</p> <p>Mineral extraction facilities have a functional need to be close to the resource that they utilise, they also must remain economically viable in order to operate efficiently and effectively, and in turn provide for current and future generations. Graymont notes that while minerals and aggregates are a commodity upon which a variety of industries and organisations depend, their importance to regional economies is not always fully appreciated. In this regard, in addition to mining and supplying essential product, mineral extraction and processing activities create a number of jobs, which are particularly important to regional economies, such as Otago.</p>	That submission number 00002.002 be accepted.
00002.003	<p>New provision GEN - General Submission</p> <p>MGL seek the following: New Policy X.X.2</p> <ul style="list-style-type: none"> <li>To recognise the functional needs of mineral exploration, extraction and processing activities to locate where the resource exists.</li> </ul>	Support	<p>Graymont records that, since 1993, New Zealand's annual aggregate production amounts to more than 700 million tonnes of quarried rock, sand and gravel. Further, demand for minerals is predicted to increase as we move to a lower carbon economy.</p> <p>Due to the significance of minerals and aggregate in building and infrastructure, Graymont considers that enabling the</p>	That submission number 00002.003 be accepted.

			extraction of locally sourced low-cost minerals and aggregate in the Otago Region is important to economic wellbeing and the efficient use and development of resources. In addition, the Company highlights that those lower prices in turn reduce the cost for building, infrastructure and other projects, which enables people and communities to provide for their social and economic wellbeing.	
00002.004	<p>New provision GEN - General Submission</p> <p>MGL seek the following: New Policy X.X.3</p> <ul style="list-style-type: none"> <li>• <u>Manage adverse effects from the exploration, extraction and processing of minerals, by:</u> <ol style="list-style-type: none"> <li>a) <u>Giving preference to avoiding their location in the following:</u> <ol style="list-style-type: none"> <li>i. <u>Areas of significant indigenous vegetation and significant habitats of indigenous fauna in the coastal environment;</u></li> <li>ii. <u>Outstanding natural character in the coastal environment;</u></li> <li>iii. <u>Outstanding natural features and natural landscapes, including seascapes, in the coastal environment;</u></li> <li>iv. <u>Areas of significant indigenous vegetation and significant habitats of indigenous fauna beyond the coastal environment;</u></li> <li>v. <u>Outstanding natural character in areas beyond the coastal environment;</u></li> <li>vi. <u>Outstanding natural features and landscapes beyond the coastal environment;</u></li> <li>vii. <u>Outstanding water bodies or wetlands;</u></li> <li>viii. <u>Places or areas containing historic heritage of regional or national significance where the effects on that historic heritage cannot be avoided;</u></li> </ol> </li> <li>b) <u>Where it is not practicable to avoid locating in the areas listed in</u></li> </ol> </li> </ul>	Support	<p>Graymont notes that unlike activities such as infrastructure, transport and energy, there are no specific provisions in the pORPS that relate to mineral extraction. In this regard, the pORPS does not currently contain provisions that specifically promote the responsible use of minerals. As highlighted above, Graymont has requested that the pORPS is amended to include provisions that promote the responsible use of minerals and seek to resolve issues associated with mineral extraction and processing within its primary submission and has proposed some specific provisions. While it prefers its own requested provisions, the Company generally supports provisions for mineral exploration, extraction and processing such as that proposed by MGL.</p> <p>Graymont is primarily concerned to ensure that existing and possible future extraction of minerals is not compromised by activities established or establishing near to those resources, which do not rely on access to those mineral resources. Graymont notes that a sustained supply of minerals is essential to the continued development of the Otago Region and New Zealand as a whole.</p> <p>Graymont considers that this, in turn would enable mineral specific provisions to be reflected in regional and district plans and for local authorities to find policy support in the pORPS for recognising the benefits derived from mineral extraction and processing activities; addressing potential 'reverse sensitivity' issues; and other issues such as those associated with the locational needs for mineral extraction and processing activities and the management of adverse effects from mineral extraction and processing activities.</p>	That submission number 00002.004 <b>be accepted.</b>

	<p>a) above due to the functional needs of that activity, the activity shall:</p> <p>i. Avoid, remedy or mitigate, as necessary, adverse effects on values in order to maintain the outstanding or significant nature,</p> <p>ii. Consider first biological diversity offsetting, and then biological diversity compensation for residual adverse effects,</p> <p>iii. Consider environmental compensation if adverse effects on indigenous biological diversity, cannot practically be avoided, remedied or mitigated;</p> <p>iv. Avoiding, remedying, or mitigating adverse effects on other values including highly valued natural features, landscapes and seascapes in order to maintain their high values;</p> <p>v. Reducing unavoidable adverse effects by staging development for longer term activities and progressively rehabilitating the site, where possible.</p>			
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**Graymont (NZ) Limited's further submission is:**

Graymont supports the submission of:

**Submitter:** Foothills Mining Ltd ('FML')  
**Submitter ID:** 00008  
**Contact Person:** Kelvin Dolton  
**Address for Service:** [foothillsmining@gmail.com](mailto:foothillsmining@gmail.com)

The particular parts of the submission that Graymont supports are:

Original Submission Point number	Relevant Provision / Submission Point	Support or Oppose	Reasons	Relief sought by Graymont (NZ) Limited
00008.002	<p>New provision GEN - General Submission</p> <p>FML seek the following: New Policy X.X.1</p> <ul style="list-style-type: none"> <li><u>Manage activities in rural areas and support the region's economy and communities, by:</u> <ul style="list-style-type: none"> <li><u>a) Enabling primary production and other rural activities that support that production;</u></li> <li><u>b) Providing for mineral exploration, extraction and processing;</u></li> </ul> </li> </ul>	Support	<p>Graymont has proposed some provisions within its primary submission, and while it prefers its own requested provisions the Company generally supports provisions for mineral exploration, extraction and processing such as those proposed by FML and notes that the pORPS does not currently contain any specific provisions for such activities, which is of concern.</p> <p>Graymont notes that mineral extraction activities by their very nature can result in significant adverse effects. As extraction activities are defined by the location of minerals, and can only occur in the location where the mineral resource is present, ensuring that these effects can be remedied, mitigated offset or may be compensated for is fundamental to the continued operation and development of such activities.</p>	That submission number 00008.002 <b>be accepted.</b>
00008.003	<p>New provision GEN - General Submission</p> <p>FML seek the following: New Policy X.X.2</p> <ul style="list-style-type: none"> <li><u>To recognise the functional needs of mineral exploration, extraction and processing activities to locate where the resource exists.</u></li> </ul>	Support	<p>Graymont operates the Makareao plant and quarry which is located in North Otago. Graymont's products have proven essential for mitigating a multitude of natural and man-made environmental impacts, while at the same time remaining indispensable for vital industrial processes. Graymont records that the value of retaining local supply of its products has become even clearer during the Covid-19 pandemic, in this respect, with the disruption of supply chains globally, having local supply of lime products to provide for clean drinking water, environmental water treatment, construction products and tissue paper (amongst other things) is essential.</p> <p>Further, due to the significance of minerals and aggregate in building and infrastructure, Graymont considers that enabling</p>	That submission number 00008.003 <b>be accepted.</b>

			the extraction of locally sourced low-cost minerals and aggregate is important to economic wellbeing and the efficient use and development of resources. In addition, the Company highlights that those lower prices in turn reduce the cost for building, infrastructure and other projects, which enables people and communities to provide for their economic wellbeing.	
00008.004	<p>New provision GEN - General Submission</p> <p>FML seek the following: New Policy X.X.3</p> <ul style="list-style-type: none"> <li>• <u>Manage adverse effects from the exploration, extraction and processing of minerals, by:</u> <ol style="list-style-type: none"> <li><u>Giving preference to avoiding their location in the following:</u> <ol style="list-style-type: none"> <li><u>Areas of significant indigenous vegetation and significant habitats of indigenous fauna in the coastal environment;</u></li> <li><u>Outstanding natural features and natural landscapes, including seascapes, in the coastal environment;</u></li> <li><u>Areas of significant indigenous vegetation and significant habitats of indigenous fauna beyond the coastal environment;</u></li> <li><u>Outstanding natural character in areas beyond the coastal environment;</u></li> <li><u>Outstanding natural features and landscapes beyond the coastal environment;</u></li> <li><u>Outstanding water bodies or wetlands;</u></li> <li><u>Places or areas containing historic heritage of regional or national significance where the effects on that historic heritage cannot be avoided</u></li> </ol> </li> <li><u>b) Where it is not practicable to avoid locating in the areas listed in a) above due to the functional</u></li> </ol> </li> </ul>	Support	<p>Graymont notes that unlike activities such as infrastructure, transport and energy, there are no specific provisions in the pORPS that relate to mineral extraction. In this regard, the pORPS does not currently contain provisions that specifically promote the responsible use of minerals. As highlighted above, Graymont has requested that the pORPS is amended to include provisions that promote the responsible use of minerals and seek to resolve issues associated with mineral extraction and processing within its primary submission and has proposed some specific provisions. While it prefers its own requested provisions, the Company generally supports provisions for mineral exploration, extraction and processing such as that proposed by FML.</p> <p>Graymont is primarily concerned to ensure that existing and possible future extraction of minerals is not compromised by activities established or establishing near to those resources, which do not rely on access to those mineral resources. Graymont notes that a sustained supply of minerals is essential to the continued development of the Otago Region and New Zealand as a whole.</p> <p>Graymont considers that this, in turn would enable mineral specific provisions to be reflected in regional and district plans and for local authorities to find policy support in the pORPS for recognising the benefits derived from mineral extraction and processing activities; addressing potential 'reverse sensitivity' issues; and other issues such as those associated with the locational needs for mineral extraction and processing activities and the management of adverse effects from mineral extraction and processing activities.</p>	That submission number 00008.004 <b>be accepted.</b>

	<p><u>needs of that activity, the activity shall:</u></p> <p><u>i. Avoid, remedy or mitigate, as necessary, adverse effects on values in order to maintain the outstanding or significant nature,</u></p> <p><u>ii. Consider first biological diversity offsetting, and then biological diversity compensation for residual adverse effects,</u></p> <p><u>iii. Consider environmental compensation if adverse effects on indigenous biological diversity, cannot practically be avoided, remedied or mitigated;</u></p> <p><u>iv. Avoiding, remedying, or mitigating adverse effects on other values including highly valued natural features, landscapes and seascapes in order to maintain their high values;</u></p> <p><u>v. Reducing unavoidable adverse effects by staging development for longer term activities and progressively rehabilitating the site, where possible.</u></p>			
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Graymont (NZ) Limited's further submission is:

GL supports the submission of:

**Submitter:** Oceana Gold (New Zealand) Ltd ('OGNZL')  
**Submitter ID:** 00115  
**Contact Person:** Alison Paul  
**Address for Service:** alison.paul@oceanagold.com

The particular parts of the submission I support are:

Original Submission Point number	Relevant Provision / Submission Point	Support or Oppose	Reasons	Relief sought by Graymont (NZ) Limited
00115.007	<p>Mineral extraction GEN - General Submission</p> <p>OGNZL seek the following: Include greater recognition and support of the mining industry in Otago throughout the PORPS. Include provisions recognise that the need to provide for future mining in Otago and at Macraes in particular is a significant resource management issue for the region and which:</p> <ul style="list-style-type: none"> <li>a) Recognise the significant economic and social benefits from mineral extraction.</li> <li>b) Protect an ability to access these significant natural resources.</li> <li>c) Recognise the finite nature of minerals.</li> <li>d) Protect existing mineral assets from reverse sensitivity activities.</li> </ul> <p>Enable a regime whereby further development of the region's minerals can occur while the effects on the natural environment are appropriately managed.</p>	Support	<p>Graymont notes that unlike activities such as infrastructure, transport and energy, there are no specific provisions that relate to mineral extraction. In this regard, the pORPS does not currently contain provisions that specifically promote the responsible use of minerals or recognise the significant economic and social benefits of the same.</p> <p>Graymont has requested that the pORPS is amended to include objectives and policies that recognise the benefits to be derived from mineral extraction and processing activities, particularly their contribution towards social and economic wellbeing, together with addressing reverse sensitivity effects and managing the adverse effects of mineral extraction and processing activities. Given this, the Company both agrees with and supports OCNZL submission that seeks the inclusion of greater recognition and support of the mining industry throughout the pORPS.</p>	That submission number 00115.007 <b>be accepted.</b>

00115.001	<p>Primary Production TERP - Definitions</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Retain the definition but also make changes to objectives and policies (LS - LF Land and Soil Chapter) to better recognise that mining is a valuable form of primary production that needs access to the key land that hosts valuable minerals.</li> </ul>	Support	<p>As previously highlighted, there are no specific provisions that relate to mineral extraction within the pORPS. Given this, Graymont considers that it is both important and appropriate to make changes to the Land and Soil Chapter, as proposed by OGNZL to recognise that mining is a valuable form of primary production, that requires access to land that hosts valuable minerals. In this regard, Graymont notes that mineral extraction activities are constrained by the location of the resource that is to be extracted.</p>	That submission number 00115.001 <b>be accepted.</b>
00115.006	<p>General SRMR - Significant resource management issues for the region</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>This chapter of the PORPS also needs to better recognise and provide for mining which is a significant issue for the region because of the economic benefits it brings.</li> </ul>	Support	<p>Mineral extraction facilities have a functional need to be close to the resource that they utilise, they also must remain economically viable in order to operate efficiently and effectively, and in turn provide for current and future generations.</p> <p>Graymont records that while minerals and aggregates are a commodity upon which a variety of industries and organisations depend, their importance to regional economies is not always fully appreciated. In this regard, in addition to mining and supplying essential product, mineral extraction and processing activities create a large number of jobs, which are particularly important to regional economies, including the Otago Region, and bring about a number of flow-on benefits to the economy.</p>	That submission number 00115.006 <b>be accepted.</b>
00115.011	<p>IM - P10 IM - Integrated management</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Insert new provisions or policy which support and encourage landowners / individuals climate change mitigation / decarbonisation initiatives</li> </ul>	Support	<p>Graymont recognises the challenge climate change presents and supports the Otago Regional Council in taking action to identify climate change impacts.</p> <p>Graymont's main product, lime, is indispensable for many industrial processes and applications, including the manufacturing of steel and paper, the production of clean drinking water and various applications in construction and agriculture. Lime products are also a big part of the solution for a multitude of crucial environmental applications - everything from enabling clean drinking water, environmental water and sewage treatment, construction of housing subdivisions and infrastructure, to the treatment of acid mine drainage, environmental remediation and power generation.</p> <p>Graymont notes that there is currently no technology available for quicklime production using electrical energy. The Company has, and continues to investigate solutions that are practicable, technologically sound and economically viable,</p>	That submission number 00115.011 <b>be accepted</b>

			implementing those that make sense both environmentally and economically. Given this, Graymont supports the need for provisions that support and encourage climate change mitigation / decarbonisation initiatives.	
00115.013	AIR - P4  OGNZL seek the following: <ul style="list-style-type: none"> <li>• <del>Avoid Manage</del> discharges to air so that <u>they do not</u> cause offensive, objectionable, noxious or dangerous effects.</li> </ul>	Support	Graymont supports that proposed amendments requested by OCNZL to AIR - P4 noting that they assist in making the intent of the policy clearer / less subjective.	That submission number 00115.013 <b>be accepted</b>
00115.014	LF - FW - P13 LF - Land and freshwater  OGNZL seek the following: (1) avoiding the loss of values or extent of a river, unless: (a) ... (b) the effects of the activity are managed by applying: (i) <del>for effects on indigenous biodiversity, either ECO - P3 or ECO - P6 (whichever is applicable),</del> and (ii) <del>for other effects,</del> the effects management hierarchy, (2) ... (4) <del>wherever possible, sustaining the form and function of a water body that reflects its natural behaviours,</del> (5) ...	Support	Graymont supports the changes proposed to LF - FW - P13 by OGNZL. In this regard, Graymont considers that policy as proposed is overly restrictive and uncertain in that reference to ECO-P3 and ECO-P6 may mean that for a number of development proposals, avoidance of adverse effects is the only option available.  Graymont further agrees that the deletion of part (4) is appropriate, in that it is 'possible' to sustain the form and function of a water body by not allowing a proposed activity, as a preferred option.	That submission number 00115.014 <b>be accepted</b>
00115.002	LF - LS - General LF - Land and Freshwater  OGNZL seek the following: <ul style="list-style-type: none"> <li>• Make changes to objectives and policies (LS - LF Land and Soil Chapter) to better recognise that mining is a valuable form of primary production that needs access to the key land that hosts valuable minerals.</li> </ul>	Support	Graymont notes that mining or mineral extraction activities by their very nature can only occur in the location where the mineral resource is present. As mineral extraction / mining is a valuable form of primary production, Graymont agrees that it should be better recognised and provided for within the LS - LF Chapter.	That submission number 00115.002 <b>be accepted</b>
00115.018	ECO - P2 ECO - Ecosystems and indigenous biodiversity  OGNZL seek the following:	Support	Graymont notes that ECO - P2 does not specifically require any areas and values of significant natural areas or indigenous species and ecosystems to be clearly mapped or scheduled within the lower order planning documents. Given this,	That submission number 00115.018 <b>be accepted</b>

	<p>Delete ECO - P2 or amend as follows: Identify: <del>(1) the areas and values of significant natural areas in accordance with APP2, and</del> <del>(2) indigenous species and ecosystems that are taoka in accordance with ECO - M3.</del> <u>Significant natural areas will be identified by local authorities using the criteria in APP2 and these areas will be mapped at an appropriate scale in the relevant regional and district plans.</u> <u>Indigenous species and ecosystems that are taoka will be identified by local authorities in accordance with ECO - M3, and these areas will be mapped in the relevant regional and district plans.</u></p>		<p>Graymont considers that the changes proposed by OGNZL (should the policy be retained) assist in providing a more precise approach as to the requirements for regional and district plans.</p>	
00115.019	<p>ECO - P3 ECO - Ecosystems and indigenous biodiversity</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Delete</li> </ul>	Support	<p>As noted by OGNZL in its submission, ECO - P3 as per the pORPS requires all Significant Natural Areas to be protected by avoiding adverse effects that result in any reduction or area of value (even if those values are no in of themselves, significant). This means that for any physical reduction in the size of a Significant Natural Area (regardless of the significance of that reduction on that species, the surrounding area or the ecological district or wider region) there is no ability for remediation, mitigation, offsetting or compensation to be offered and considered as required under section 104(1) of the RMA. Graymont considers this to be both unnecessarily restrictive and inappropriate, and as such, agrees that the policy should be deleted.</p>	That submission number 00115.019 <b>be accepted</b>
00115.020	<p>ECO - P4 ECO - Ecosystems and indigenous biodiversity</p> <p>OGNZL seek the following: Delete this policy or amend to add-</p> <ul style="list-style-type: none"> <li><u>(1)(a) The construction, operation, maintenance and rehabilitation of any mineral and aggregate extraction activity.</u></li> </ul>	Support	<p>ECO - P4 requires that Otago's indigenous biodiversity is maintained by following the sequential steps in the effect management hierarchy set out in ECO-P6 when making decisions on plans, applications for resource consents or notices of requirements for a number of activities in significant natural areas, or where they may adversely affect indigenous species and ecosystems that are taoka. Mineral extraction activities have not been provided for.</p> <p>Further, and as noted previously, mineral extraction and processing activities, which are important to the Otago Region, by their very nature, are functionally, locationally and operationally constrained to the resource that they utilise.</p> <p>Graymont considers that the approach that has been adopted in ECO-P4 fails to both recognise mineral extraction activities</p>	That submission number 00115.020 <b>be accepted</b>

			and their constraints, given this, Graymont supports that amendment to the policy requested by OGNZL.	
00115.021	<p>ECO - P5 ECO - Ecosystems and indigenous biodiversity</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Delete or amend this policy so that it provides more certainty that all activities (new and existing) could be able to be developed within an appropriately zoned area.</li> </ul>	Support	Graymont considers that the intent of ECO - P5 is unclear as to whether it relates to the general ongoing continuation of a legally authorised activity or whether it would be applicable to the development of new activities (such as a new mine / extension to a mined area) associated with an existing legally authorised activity within an appropriately zoned area. For these reasons, Graymont supports the OGNZL's submission to ECO - P5.	That submission number 00115.021 <b>be accepted</b>
00115.022	<p>ECO - P6 ECO - Ecosystems and indigenous biodiversity</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Amend this policy (and/or corresponding provisions) so that it enables other regionally significant activities such as mineral extraction to have access to the effects management hierarchy.</li> <li>Consequential Amendments to APP3 and APP4 are also proposed.</li> </ul>	Support	Graymont considers that the effects management hierarchy that is set out in ECO - P6 is appropriate, however it is concerned to ensure that this hierarchy is available to mineral extraction activities in the decision making associated with applications for resource consent and notices of requirement. Given this, Graymont supports OGNZL's submission to ECO - P6.	That submission number 00115.022 <b>be accepted</b>
00115.023	<p>APP2 - Significance criteria for indigenous biodiversity</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Make amendments so that the significance criteria align with national direction as set out in the (currently Draft) NPSIB</li> </ul>	Support	Graymont supports amendments to APP2 - APP4 so that they are aligned with national direction.	That submission number 00115.023 <b>be accepted</b>
00115.024	<p>APP3 - Criteria for biodiversity offsetting</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Remove limits as to when offsetting can be offered in clause (1). or otherwise align to achieve consistency with national direction via the Draft NPSIB.</li> <li>Amend the offsetting requirements and outcomes so as to achieve consistency with recommended best practice for offsetting and/or national direction via the Draft NPSIB.</li> </ul>	Support		That submission number 00115.024 <b>be accepted</b>

00115.026	<p>APP4 - Criteria for biodiversity compensation</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Remove limits as to when biodiversity compensation can be offered in clause (1). Or otherwise align to achieve consistency with national direction via the Draft NPSIB.</li> <li>Amend the compensation requirements and outcomes so as to achieve consistency with recommended best practice for compensation and/or national direction via the Draft NPSIB.</li> </ul>			That submission number 00115.026 <b>be accepted</b>
00115.026	<p>HAZ - NL-01</p> <p>HAZ - Hazards and risks</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Retain this objective. However, OceanaGold wishes to confirm that “tolerable” is consistent with the acceptable hazard risk which appears to be more commonly used in practice.</li> </ul>		Graymont supports the submission of OGNZL and considers that use of known and commonly used terminology will provide more certainty and clarity within the objective.	That submission number 00115.026 <b>be accepted</b>
00115.031	<p>UFD-04</p> <p>UFD - Urban form and development</p> <p>OGNZL seek the following:</p> <ul style="list-style-type: none"> <li>Delete this objective. Or alternatively, amend this objective to refer to “Urban development in Otago’s rural areas...”</li> </ul>	Support	UFD -04, as per the pORPS requires development in rural areas to ‘avoid’ impacts on significant values and features identified in the pORPS. Graymont is therefore concerned that, without more specific wording, this objective may prohibit a number of activities within rural areas. Given this, Graymont supports the submission advanced by OGNZL to this objective.	That submission number 00115.031 <b>be accepted</b>

