

From: [Sharon Aitchison](#)
To: [RPS](#)
Cc: [Claire Hunter](#)
Subject: PORPS Further Submission - Oceana Gold (New Zealand) Ltd
Date: Friday, 12 November 2021 4:59:01 p.m.
Attachments: [ATT00001.gif](#)
[OceanaGold Further Submission on PORPS 12.11.21.pdf](#)

Attention: ORC Policy Team

Please find attached a Further Submission by **Oceana Gold (New Zealand) Ltd** with respect to the Proposed Otago Regional Policy Statement 2021. We undertake to serve copies of this further submission on the relevant submitters within 5 working days.

Please acknowledge receipt in due course.

Regards

Sharon (on behalf of Claire Hunter)



Sharon Aitchison
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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

Oceana Gold (New Zealand) Limited (**OceanaGold**)

2. This is a further submission in support of and in opposition to various submissions on the **Proposed Otago Regional Policy Statement 2021 (PORPS)** as further explained in the attached table.

3. I am *(tick whichever applies and add grounds if required)*:

| | |
|----------|---|
| | 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: | OceanaGold made a submission on the PORPS seeking a number of changes to enable its operations to continue and will be affected by the PORPS including those submissions it is making further submissions on. |
| | the local authority for the relevant area. |

4. OceanaGold wish to be heard in support of this further submission.

5. If others make a similar submission OceanaGold 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).

[submission made by electronic means therefore no signature required]

b. Signatory name, position, and organisation *(if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)*

Name Alison Paul

Position General Manager Corporate and Legal Affairs

Organisation Oceana Gold (New Zealand) Limited

c. Date

12 November 2021

Address for service of person making further submission *(This is where all correspondence will be directed)*

d. Contact person *(name and designation, if applicable)*

Alison Paul

e. Email: *(this is our preferred means of contact)*

alison.paul@oceanagold.com

f. Telephone:

03 479 2922

g. Postal address *(or alternative method of service under [section 352](#) of the Act):*

22 MacLaggan Street, Dunedin 9016

| Submitter | Provision | Original submission point number | Submission Summary | Support OR Oppose | The reasons for my support/opposition are: | I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state]. |
|--|---------------------|-------------------------------------|---|-------------------|--|---|
| Royal Forest and Bird Protection Society of New Zealand Incorporated | General Submission | 00230.003 | In relation to the use of effects management hierarchies, seek consistent amendments throughout the RPS to place the emphasis on avoiding the effects in the first place. | Oppose | OceanaGold opposes the focus of the submitter's submission on wanting to avoid effects without appreciating that in some situations this may not be possible. | Disallowed. |
| Central Otago Environmental Society | General Submission | 00202.001 | We support the general tenor and direction of the ORPS | Oppose | OceanaGold opposes this submission, and for the reasons set out in OceanaGold's submission suggests that considerable changes are required to the PORPS. | Disallowed. |
| Z Energy Limited, BP Oil NZ Limited, Mobil Oil NZ Limited | General Submission | 00510.003 | Give effect to National Policy Statements, Environmental Standards and Regulations, including the New Zealand Coastal Policy Statement (NZCPS). | Support | OceanaGold supports the submission, in particular the need for the PORPS to align with the NPS-IB. | Allowed. |
| Federated Farmers of New Zealand | General Submission | 00239.195 | Significantly review and amend the overly restrictive and prohibitive approach taken within the RPS. | Support | OceanaGold supports this submission because it agrees that the approach taken in the PORPS is overly restrictive and prohibitive and will prevent development occurring. | Allowed. |
| Federated Farmers of New Zealand | General Submission | 00239.199 | Amend to recognise that there are deep inconsistencies between the natural character, outstanding natural landscape, and outstanding water body provisions. | Support | OceanaGold supports the focus of the submitter's submission on the inconsistencies between provisions in the PORPS. | Allowed. |
| Alluvium Ltd and Stoney Creek Mining Limited | General Submissions | 00016.001 | Amend RPS21 to provide for the mineral exploration, extraction, and processing activities to locate where the resource exists . This could be achieved through carrying forward the RPS19 mineral extraction policies to the RPS21. | Support | OceanaGold supports that the PORPS needs to be amended to recognise that mineral exploration, extraction, and processing activities are locationally constrained and need to be provided for. | Allowed in part. OceanaGold has some concerns with carrying forward the RPS19 provisions in full. |
| Joostens, Phillip | General Submission | 00010.001 | Amend RPS21 to provide for the recognition and regional value of the extraction industry. | Support | OceanaGold supports recognising the value of the extraction industry. | Allowed. |
| Matakanui Gold Limited | General Submission | 00021.001 | Amend the RPS21 to recognise the functional needs of mining and that the activity needs to occur where the resource exists, acknowledge the socioeconomic benefits of mining, and manage the effects of mining. | Support | OceanaGold supports recognising the functional needs of mainlined and acknowledging the benefits of mining whilst managing effects. | Allowed. |
| Matakanui Gold Limited | General Submission | 00021.003 | Amend the RPS21 to provide dedicated policies for mining because the extractive nature of mining is different to other primary production activities. | Support | OceanaGold supports providing dedicated policies for mining. | Allowed. |
| Straterra | General Submission | 00019.001 | 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. | Support | OceanaGold supports the focus of the submitter's amendments, and it is important to provide a consenting pathway for the extractives industry and this is in accordance with the suggested provisions of the proposed NPS-IB. | Allowed. |
| Straterra | General Submission | 00019.003 | Amend the RPS21 to recognise that mineral extraction, like infrastructure, is locally constrained. | Support | OceanaGold supports the focus of the submitter's amendments, as it is important to acknowledge the locational constraints of mineral extraction. | Allowed. |
| Straterra | General Submission | 00019.004 | 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. | Support | OceanaGold supports the focus of the submitter's amendments, as it is important to acknowledge the locational constraints of mineral extraction. Also it is important to provide a consenting pathway for mineral extraction and this is in accordance with the suggested provisions of the proposed NPS-IB. | Allowed. |
| Duncan, Brent & Kelly; Foothills Mining Ltd; Gerber, Daniel Graymont (NZ) Ltd; | New Provisions | 00006.001 - .004 00008.001- .004 | Insert new provisions relating to mineral extraction. | Support | OceanaGold supports the focus of the submitters' amendments as it provides a consenting pathway for mineral exploration, extraction and processing and this is in accordance with the suggested provisions of the proposed NPS-IB. | Allowed. |

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|--|-----------------------------|---|--|-------------------|---|---|
| Greaves, Paul George Harriss, Gavin | | 0004.001-.004 00022.030-.032 00105.001-.004 00107.001-.004 | | | | |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | Freshwater planning process | 00230.001 | It is not lawful to put the entire RPS through the freshwater planning process. | Support | OceanaGold supports the submission because it recognises that there are parts of the PORPS which do not relate to freshwater. | Allowed. |
| Federated Farmers of New Zealand | Purpose | 00239.001 | <p>- Delete the following two sentences: “As a community, we in Otago are moving into an age that requires solutions to both entrenched legacy issues and significant emerging issues in order to promote positive sustainable change while also enabling the Otago community to flourish, and to enjoy all that the region has to offer. The ORPS responds to identified significant regional values and resource management issues relating to Otago’s environment, historic heritage, economy, recreational opportunities and communities”</p> <p>- Reinstate the following two paragraphs from the Overview section of the partially operative RPS 2019: <u>“Continued prosperity and wellbeing is essential to ensuring the community is equipped to face the environmental, economic, cultural and social changes of the 21st century, and to provide opportunities for all people to realise their aspirations. A thriving and healthy natural environment is vital to sustaining our wellbeing. The RPS is a high level policy framework for the sustainable integrated management of resources, identifying regionally significant issues, the objectives and policies that direct how natural and physical resources are to be managed and setting out how this will be implemented by the region’s local authorities.</u>”</p> | Support | OceanaGold supports the focus of the submitters’ amendments and it better reflects the purpose of the RPS and sustainable management. | Allowed. |
| Federated Farmers of New Zealand | Statutory Context | 00239.004 | Amend as follows or similar: “The regional policy statement must give effect to higher order national direction instruments, including National Environmental Standards (NES) , National Policy Statements (NPS), and the New Zealand Coastal Policy Statement (NZCPS), and should be written to comply | Support | OceanaGold supports the focus of the submitter’s amendments on the relationship between the RPS and NES. | Allowed. |

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|---------------------------------------|---------------------|----------------------------------|--|-------------------|--|---|
| | | | with the National Planning Standards <u>and to not duplicate or conflict with National Environmental Standards (NES).</u> | | | |
| New Zealand Infrastructure Commission | Definitions General | 00321.106 | <p>Amend as follows: Guidance on the definition of nationally significant infrastructure should be provided with reference to the Te Waihanga 30 Year Infrastructure Strategy which is due to be published in March 2022.</p> <p>AND</p> <p>Nationally consistent guidance on the “Regionally Significant” infrastructure would be beneficial. This should include infrastructure that is interdependent (ie one is of little value without the other) or interconnected (part of the same network without which the network as a whole fails) with existing nationally or regionally significant infrastructure.</p> <p>AND</p> <p>There should specifically reference to economic infrastructure without which the economies of Otago cannot function. including for example those highlighted by the submitter’s submission as unique to the Otago region and unable to locate outside of the areas listed in EIT–INF–P13 such as ski field infrastructure.</p> | Support | OceanaGold supports the focus of the submitter’s amendments on reference to private economic infrastructure as this recognises the locational constraints of important infrastructure. The submission has used the example of ski field infrastructure, but this would equally apply to OceanaGold’s infrastructure. | Allowed. |
| Queenstown Lakes District Council | Definitions | 00138.028 | <p>Amend to add a definition of ‘biodiversity offsetting’ from the proposed NPS for Indigenous Biodiversity, as follows:</p> <p>“Means a measurable conservation outcome resulting from actions designed to compensate for residual, adverse biodiversity effects arising from activities after appropriate avoidance, remediation, and mitigation measures have been applied. The goal of a biodiversity offset is to achieve no – net – loss, and preferably a net – gain, of indigenous biodiversity values.”</p> | Oppose in part | OceanaGold supports alignment with the NPSIB but notes that it is still in draft format and therefore this definition could be subject to further amendment. Once the final NPSIB is prepared, the ORPS should be consistent with this. | Allow – provided it reflects the definition of the NPSIB. |
| Aurora Energy Limited | Definitions | 00315.014 | Amend as follows: Add a new definition for “effects management hierarchy (Other Matters)” | Support in part | OceanaGold acknowledges that the current definition of ‘effects management hierarchy’ has been taken from the National Policy Statement for Freshwater Management and a revised definition applying to areas outside the freshwater environment may be appropriate. | Allowed. |
| Queenstown Lakes District Council | Definitions | 00138.029 | Amend to add a definition of ‘environmental compensation’ | Oppose in part | OceanaGold supports alignment with the NPSIB but notes that it is still in draft format and therefore this definition could be subject to further amendment. Once the final NPSIB is prepared, the ORPS should be consistent with this. | Allow – provided it reflects the definition of the NPSIB. |

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|--|-------------|----------------------------------|---|-------------------|---|---|
| Blackthorn Lodge Glenorchy Limited | Definitions | 00119.035 | "Minimise" to be defined as follows: Minimise – reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning. | Oppose | OceanaGold opposes the submission as it does not consider there is utility in defining "minimise". | Disallowed. |
| Otago Fish & Game Council and the Central South Island Fish & Game Council | Definitions | 00231.017 | Amend as follows: Insert definition: Minimise means to reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning. | Oppose | OceanaGold opposes the submission as it does not consider there is utility in defining "minimise". | Disallowed. |
| Wayfare Group Ltd | Definitions | 00411.015 | Insert a new definition, "minimise", as follows: Reduce to the smallest amount reasonably practicable. Minimised, minimising and minimisation have the corresponding meaning. | Oppose | OceanaGold opposes the submission as it does not consider there is utility in defining "minimise". | Disallowed. |
| Wise Response Society Inc | Definitions | 00509.018 | Add a new definition: Net ecological gain is a significant improvement in an ecological function that might be expressed in one or more of the following attributes: scale, type, resilience, diversity, redundancy, variability. The term is introduced in this policy statement primarily as an alternative approach to development with "minor adverse effect". | Oppose | OceanaGold opposes the submission as it does not seem to accord with the effects hierarchy and its focus on significant is unnecessary. | Disallowed. |
| Wise Response Society Inc | Definitions | 00509.014 | Add a new definition: "Integrated Resource Management is a process of managing natural and physical resource use in a way that is efficient and sustainable and optimises overall benefit from a set of defined objectives, while minimising adverse effects and risks. This is facilitated by ensuring that all plans and policies are vertically and horizontally compatible and do not conflict with each other within the region and as far as possible, between regions. It brings together the likes of natural heritage management, land use planning, water management, bio – diversity conservation, and the future sustainability of industries like agriculture, mining, tourism, fisheries and forestry." | Oppose. | OceanaGold opposes the submission as it is unnecessary and could create uncertainty. | Disallowed. |
| Otago Fish & Game Council and the Central South Island Fish & Game Council | Definitions | 00231.018 | Amend as follows: Insert definition: Precautionary approach means an approach that: (a) avoids not acting due to uncertainty about the quality of quantity of the information available, and (b) interprets uncertain information in a way that best supports the health, wellbeing and resilience of the natural environment | Oppose | OceanaGold opposes the submission as it is unnecessary to include such a definition. | Disallowed. |
| Beef & Lamb NZ and Deer Industry NZ | Definitions | 00237.008 | Amend to include a definition of 'tipping point'. | Oppose | OceanaGold opposes a definition of tipping point as it is not a resource management term. | Disallowed. |
| Meridian Energy Limited | Definitions | 00306.001 | Amend effects management hierarchy definition | Support in part | OceanaGold supports the focus of the submission on recognising that there are some activities where it is not practicable to avoid, remedy or mitigate adverse effects. | Allowed in part. |

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|--------------------------|--------------------|----------------------------------|--|-------------------|---|---|
| Te Ao Marama | Definitions | 00223.018 | Retain the definition of 'Effects management hierarchy' and its application to natural wetlands. | Support in part | OceanaGold supports retaining the definition of effects management hierarchy. | Allowed in part. |
| Meridian Energy Limited | Definitions | 00306.003 | Delete definition of "highly valued natural features and landscapes" | Support | OceanaGold supports deleting the definition. | Allowed. |
| Matakanui Gold Limited | Definitions | 00021.004 | Add a definition on mining. Mining Has the same meaning as the Crown Minerals Act as set out in the box below: (a) means to take, win, or extract, by whatever means,— (i) a mineral existing in its natural state in land; or (ii) a chemical substance from a mineral existing in its natural state in land; and (b) includes— (i) the injection of petroleum into an underground gas storage facility; and (ii) the extraction of petroleum from an underground gas storage facility; but (c) does not include prospecting or exploration for a mineral or chemical substance referred to in paragraph (a) | Support in part | OceanaGold supports the submission as it is utilising the definition from the Crown Minerals Act 1991, however this also needs to include exploration otherwise it will be problematic. | Allowed. |
| Matakanui Gold Limited | Definitions | 00021.002 | Amend the definition of "primary production" to recognise that mineral extraction is not a suitable component of primary production as it relates to LFLS – P19 High and UFD – P7 – Rural Area which seeks to enable primary production (including mining) on land or soils identified as highly product | Support in part | OceanaGold supports the focus of the submitter's proposed amendments in highlighting the inconsistency and conflict in how mining, as a component of primary production is treated. However the National Planning Standard recognises that mining is part of primary production and this needs to be facilitated. | Allowed in part. |
| Meridian Energy Limited | Definitions | 00306.007 | Delete OR Amend as follows: "means the risk remaining after the implementation or undertaking of all available and practicable risk management measures." | Support | OceanaGold agrees with the submitter that this definition could be removed or amended. | Allowed. |
| Horticulture New Zealand | General Submission | 00236.004 | That urban development and productive land are considered together to provide a planned approach so new urban areas are designed in a manner that maintains the overall productive capacity of highly productive land. Need to ensure economic and environmental sustainability of primary production are taken into account when protecting HPL. It is important that the definition of highly productive land includes the key natural and physical resources that contribute to the land's productivity. We also recognise that some of these natural and physical factors can be modified with policy and investment, | Support in part | OceanaGold supports the intent of this submission but notes that primary production is broader than agricultural or horticultural type uses and suitable provision for access to and the use of land for all aspects of primary production needs to be recognised in the ORPS. | Allowed. |

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| | | | and that all of these factors contribute to the productive capacity of land. HortNZ seek that the outcome related to the protection of HPL is focused on protecting the productive capacity of highly productive land from inappropriate subdivision, use and development. | | | |
| Forest & Bird | Rural Area definition | 00230.014 | If rural production is the focus of rural areas then national parks and land held for other purposes should not be considered “rural area”. Include a definition which sets out the meaning for “rural area” where that term is used in the RPS, rather than a default. | Support | OceanaGold agrees that further specification as to what areas are considered to be rural or otherwise is necessary. | Allowed. |
| Silver Fern Farms | Rural Industry Definition | 00221.001 | Define rural industry in accordance with Standard 14 of the National Planning Standards 2019 (below): rural industry means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production. | Support | OceanaGold supports use of consistent terminology such as that which is derived from the National Planning Standards 2019. | Allowed. |
| Trojan Holdings Limited | Rural Industry Definition | 00206.012 | Amend as follows: Insert definition of Rural Industry, like the following: Means the use of land and buildings for the purpose of manufacturing, fabricating, processing, packing and/or storage of goods and materials grown or sourced outside the urban environment and the storage of goods, materials and machinery associated with commercial contracting undertaken outside the urban environment. OR Means an industry or business undertaken in a rural environment that directly supports, services, or is dependent on primary production | Support | OceanaGold supports use of consistent terminology such as that which is derived from the National Planning Standards 2019. | Allowed. |
| Meridian Energy Limited | Significant Natural Area Definition | 00306.009 | Amend as follows: “means areas of significant indigenous vegetation and significant habitats of indigenous fauna that are identified by applying the criteria set in APP2 and are located outside the coastal environment. “ | Support in part | OceanaGold agrees that this amendment improves the certainty of this definition. | Allowed. |
| Fonterra | Regionally Significant Infrastructure | 00213.008 | Add new (13) to the Definition – Regionally significant infrastructure as follows: (13) infrastructure necessary to enable the operation of regionally significant industry | Support | OceanaGold supports suitable recognition in the ORPS of the importance of infrastructure which enables the operation of regionally significant industry. | Allowed. |
| Trojan Holdings Limited | Regionally Significant Infrastructure | 00206.015 | Amend the definition of “regionally significant infrastructure” as follows: Means: ... (13) Ski Area Infrastructure | Support | OceanaGold supports recognition that private infrastructure, including mining infrastructure, also has significant importance within the region and contributes to the ongoing economic, social and cultural wellbeing of the region. | Allowed. |

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|------------------------------|--|----------------------------------|---|-------------------|---|---|
| Wayfare Group | Regionally Significant Infrastructure | 00411.022 | Amend the definition of “regionally significant infrastructure” as follows: Means: ... (13) Ski Area Infrastructure | Support | OceanaGold supports recognition that private infrastructure, including mining infrastructure, also has significant importance within the region and contributes to the ongoing economic, social and cultural wellbeing of the region. | Allowed. |
| Ravensdown Limited | Waste Definition | 00121.013 | Amend the definition for ‘Waste’ as follows: | Support in part | OceanaGold agrees that providing more certainty and consistency with regard to this definition may be appropriate. OceanaGold does however wish to ensure it does not inadvertently capture activities that would not otherwise be captured as waste material. | Allowed (subject to final wording). |
| Balance Agri-Nutrients | Natural Wetland Definition | 00409.012 | Amend the definition of natural wetland to align with the Ministry for the Environment final version of guidance on the definition of a natural wetland, once released. | Support | OceanaGold supports this amendment for the reasons it has set out in OceanaGold’s submission on this matter. | Allowed. |
| Waitaki District Council | INTR – Description of the Region | 00140.001 | Amend Para 5 to use generic descriptor “primary production” to replace agriculture and mining references – horticulture and viticulture are included within the generic primary production definition. Include reference to North Otago alongside South Otago and Central Otago, or use a generic reference to “rural Otago” | Support in part | OceanaGold seeks to ensure that the use of “primary production” is used consistently throughout the ORPS, and appropriate weight and recognition is given to each component. | Allowed in part. |
| OWRUG | SRMR – Significant Resource Management Issues for the Region | 00235.022 | Replace ‘tipping point’ with ‘threshold’ throughout the SRMR. | Support | OceanaGold considers it appropriate to replace the term “tipping point” with “threshold”. | Allowed. |
| Minister for the Environment | SRMR – Significant Resource Management Issues for the Region | 00136.002 | There is not sufficient recognition of over – allocation as a significant issue for the region. Recommend adding in a discussion around the over – allocation and the historic context of deemed mining permits | Oppose in part | OceanaGold is concerned that this submission needs to sufficiently cover the economic benefits of use with regard to allocation of resources. Recognition of the investment in existing infrastructure also needs to be considered as part of this discussion. | Disallowed. |
| Trojan Holdings Limited | SRMR – Significant Resource Management Issues for the Region | 00206.078 | Insert new section to identify and discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources. This section should also identify and discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment. | Support | OceanaGold agrees that it is important to recognise the benefits the use and development of natural and physical resources provides to the wellbeing of the region. | Allowed. |
| Fonterra | SRMR – Significant Resource Management Issues for the Region | 00213.018 | Include a further “significant resource management issue” focusing on the dependence of regional communities’ social and economic well-being on: (a) resource use and the need to provide for that use within sustainable limits, and (b) the importance of regionally significant industry and infrastructure to | Support | OceanaGold agrees that it is important to recognise the benefits the use and development of natural and physical resources provides to the wellbeing of the region. It is also appropriate to protect existing industry and established activities from the adverse effects of reverse sensitivity. | Allowed. |

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|---------------------------------------|--|----------------------------------|---|-------------------|---|---|
| | | | economic and social well-being and the need to protect it from the effects of reverse sensitivity. | | | |
| Wayfare Group Ltd | SRMR – Significant Resource Management Issues for the Region | 00411.097 | Insert new section to identify and discuss, in a positive frame, the benefits to people and the environment from subdivision, use and development of natural and physical resources. This section should also identify and discuss the wellbeing benefits (and need) of ensuring people can access and use the rural and natural environment. | Support | OceanaGold agrees that it is important to recognise the benefits the use and development of natural and physical resources provides to the wellbeing of the region. | Allowed. |
| Federated Farmers of New Zealand | SRMR – Significant Resource Management Issues for the Region | 00239.019 | Make the following amendments: - Amend the provisions to acknowledge and reflect the fact Otago’s natural resource assets enable the people and communities within Otago to provide for their social, economic, and cultural wellbeing. - Amend sentence two of the first paragraph as follows: “Natural resources include freshwater (i.e., surface and groundwater, wetlands, estuaries), land, terrestrial, soil and freshwater ecosystems, coastal and marine ecosystems, and air, landscapes, vegetation and natural landforms | Support | OceanaGold agrees that it is important to recognise the benefits the use and development of natural and physical resources provides to the wellbeing of the region. | Allowed. |
| New Zealand Infrastructure Commission | SRMR – Significant resource management issues for the region | 00321.013 | Amend as follow: Infrastructure access to the effects management hierarchy can help resource pest control, and this should be recognised as part of the solution to the problem | Support | OceanaGold supports the submitter and that by enabling activities to access the effects management hierarchy, pest control can be an effective management tool and contribute significant environmental benefits. | Allowed. |
| Waitaki District Council | SRMR – Significant resource management issues for the region | 00140.014 | Include a greater recognition of mining operations in the Otago region and their contribution towards social and economic wellbeing. Recognise the Macraes Mine special zoning under the Waitaki District Plan within the PRPS. | Support | OceanaGold supports the provision for special purpose zones as part of existing use protections. | Allowed. |
| Waitaki District Council | SRMR – Significant resource management issues for the region | 00140.012 | Amend to include reference to carbon forestry as a resource management issue for Otago (p.70, 71) | Support | OceanaGold agrees with the submitter that it is important to also recognise carbon forestry as a resource management issue for the region. | Allowed. |
| Fonterra Co - | SRMR – Significant resource management issues for the region | 00213.016 | Add to the list of bullet points under the “Economic” heading on p 73 the following additional matter: Conflict arising from the location of incompatible activities within proximity of each other, including the potential for reverse sensitivity effects on the continued operation and growth of regionally significant industry. | Support | OceanaGold agrees that it is important to recognise the benefits the use and development of natural and physical resources provides to the wellbeing of the region. It is also appropriate to protect existing industry and established activities from the adverse effects of reverse sensitivity. | Allowed. |

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|---------------------------------------|--|----------------------------------|---|-------------------|--|---|
| Fulton Hogan | SRMR – Significant resource management issues for the region | 00322.005 | Amend SRMR-I4 | Support | OceanaGold agrees that it is important to recognise the benefits of primary production to the region. | Allowed. |
| WAI Wanaka | SRMR – Significant resource management issues for the region | 00222.021 | Refer to the National Policy Statement for Indigenous Biodiversity | Support | OceanaGold considers it appropriate to refer to higher order planning documents and to ensure these are appropriately given effect to within the ORPS. | Allowed. |
| OWRUG | SRMR – Significant resource management issues for the region | 00235.053 | Amend Context paragraph 2 as follows: Delete first sentence and replace with “Activities that rely on natural and physical resources can adversely impact those resources if not appropriately managed or controlled. If these impacts are not managed or controlled the sustainability of the regions natural resources can be threatened. Equally long-term economic, social and cultural values can be compromised or threatened. Amend ‘tipping point’ to ‘thresholds’ | Support | OceanaGold generally supports these statements made by the submitter. In particular OceanaGold agrees that it is appropriate to amend "tipping point" to “thresholds”. | Allowed. |
| Fonterra Co – operative Group Limited | IM – Integrated Management | 00213.022 | Insert and additional objective as follows: <u>IM – O5 – Regionally significant industry and infrastructure</u> <u>The social, economic and cultural well-being of Otago’s communities is enabled through the appropriate protection, use and development of regionally significant infrastructure and regionally significant industry.</u> | Support | OceanaGold agrees that it is to protect the ongoing use and development of regionally significant infrastructure and industry. These activities contribute significantly to the social, economic and cultural wellbeing of the region. | Allowed. |
| Kai Tahu ki Otago / Aukaha | IM – Integrated Management | 00226.005 | Amend provisions (as set out separately) to provide for better integration between freshwater and the coastal environment, and to make the link between land management and freshwater outcomes clearer. | Oppose | OceanaGold notes that there is currently High Court proceedings underway with regard to the status of the ORPS being a freshwater planning instrument in its entirety or note. The outcome of this process is not yet known and there may be difficulties in creating such linkages as a result of this. | Disallowed. |
| Mt Cardrona Station | IM – Integrated Management | 00014.015 | Include new provisions relevant to recognising positive benefits of the use and development of natural and physical resources. | Support | OceanaGold agrees that it is important to recognise the benefits the use and development of natural and physical resources provides to the wellbeing of the region. | Allowed. |
| Federated Farmers of New Zealand | IM – O1 | 00239.034 | Amend as follows: “The management of natural and physical resources in Otago, by and for the people of Otago, including Kāi Tahu, and as expressed in all resource management plans and decision making, achieves healthy, resilient, and safeguarded natural systems, and the ecosystem services they offer provide, and supports the social, | Support | OceanaGold supports the amendments being made by the submitter as they appropriately recognise that the management of natural and physical resources, includes appropriately supporting the social, economic and cultural wellbeing of the region. | Allowed. |

| Submitter | Provision | Original submission point number | Submission Summary | Support OR Oppose | The reasons for my support/opposition are: | I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state]. |
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| | | | cultural and economic well-being of present and future generations (mō tātou, ā, mō kā uri ā muri ake nei). “ | | | |
| Fonterra Co – operative Group Limited | IM-O1 | 00213.021 | Either: (a) Retain IM – O1, but include the words “economic, social and cultural” before the word “well-being”, and/or (b) Include an additional objective that recognises that the management of resources has to take into account the need for people to use those resources and hence social, cultural and economic consideration needs to be integrated into policy and regulatory decision – making. | Support | OceanaGold supports the amendments being made by the submitter as they appropriately recognise that the management of natural and physical resources, includes appropriately supporting the social, economic and cultural wellbeing of the region. | Allowed. |
| Transpower New Zealand Limited | IM-O1 | 00314.010 | Amend as follows: The management of natural and physical resources in Otago, by and for the people of Otago, including Kāi Tahu, and as expressed in all resource management plans and decision making, achieves healthy, resilient, and safeguarded natural systems, and the ecosystem services they offer, and natural and physical resources supports the health, safety and well – being of present and future generations, mō atou, ā, mō kā uri ā muri ake nei.” AND As a consequence, amend the policies that implement this Objective to provide appropriate direction in respect of the use, development, and protection of physical resources and the way in which the potential of physical resources is sustained. | Support | OceanaGold supports the amendments being made by the submitter as they appropriately recognise that the management of natural and physical resources, includes appropriately supporting the social, economic and cultural wellbeing of the region. | Allowed. |
| Federated Farmers of New Zealand | IM-O3 | 00239.035 | Amend as follows: “Otago’s communities carry out their activities, and their social, cultural and economic wellbeing is provided for, in a way that preserves environmental integrity, form, function, and resilience, so that the life-supporting capacities of air, water, soil, ecosystems, and indigenous biodiversity endure for future generations. “ | Support | OceanaGold supports the amendments being made by the submitter as they appropriately recognise that the management of natural and physical resources, includes appropriately supporting the social, economic and cultural wellbeing of the region. | Allowed. |
| Dunedin City Council | IM-P1 | 00139.026 | Where there are clear conflicts between RPS requirements amend so that there is clear guidance within the policy wording on how these should be managed (see general comments). For example: In giving effect to this RPS, decision-makers should consider: (1) All provisions relevant to the issue or decision, (2) if multiple provisions are relevant, consider the provisions together and apply relatively weight to | Support | OceanaGold agrees with the submitter that greater clarity is required within the RPS with regard to conflicts and competing matters. | Allowed. |

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| | | | <p>them according to the terms in which they are expressed, and</p> <p>(3) notwithstanding the above, all provisions must be interpreted and applied to achieve the integrated management objectives IM – O1 to IM – O4.</p> <p>However, with additional guidance on weighting here it is essential that the weight of policy language is carefully considered and the comments from the DCC with respect to policy wording should be considered.</p> | | | |
| Royal Forest and Bird Protection | IM-P4 | 00230.034 | <p>Amend as follows:</p> <p>“Healthy <u>and resilient</u> ecosystems and ecosystem services are achieved through a planning framework that:</p> <p>(1) protects their intrinsic values,</p> <p>(2) takes a long-term strategic approach that recognises changing environments,</p> <p>(3) recognises and provides for ecosystem complexity and interconnections, and</p> <p>(4) anticipates, or responds swiftly to, changes in activities, pressures, environmental state and trends, and</p> <p>(5) <u>measures cumulative effects on the environment and requires their proactive management, including by taking a precautionary approach when considering effects of activities.</u>”</p> | Oppose | <p>The addition of clause (5) is not considered necessary.</p> <p>Clauses (1) and (2) seek to protect the intrinsic values of ecosystems and adopt a long-term strategic approach that recognises changing environments. Adopting a precautionary approach when considering the effects of activities is also not a mandatory requirement of the RMA.</p> | Disallowed. |
| Meridian Energy Limited | IM-P5 | 00306.021 | Retain as notified. | Support | OceanaGold considers the drafting of this policy to be appropriate and should be retained as notified. | Allowed. |
| Wise Response | IM-P10 | 00509.039 | <p>Amend IM-P10</p> <p>(4) – do not enable activities that do not comply with zero carbon requirements</p> | Oppose | OceanaGold opposes this additional clause. While climate change matters are important, OceanaGold notes that there is a transitional period enabled by government legislation which allows for companies to (within acceptable economic and commercial parameters) move away from carbon generating activities. It is also not clear how the RMA amendments as they relate to climate change will apply and this change is likely to be premature on this basis. | Disallowed. |
| Blackthorn Lodge Glenorchy Limited | IM-P10 | 00119.002 | <p>Amend as follows:</p> <p>(2) prioritise avoiding the establishment of new activities in areas subject to <u>significant</u> risk from the effects of climate change, unless those activities reduce, or are resilient to, those <u>significant</u> risks, and</p> | Support | It is appropriate to temper this policy as proposed by the submitter. | Allowed. |
| Meridian Energy Limited | IM-P11 | 00306.024 | Retain as notified. | Support | OceanaGold considers the drafting of this policy to be appropriate and should be retained as notified. | Allowed. |
| Royal Forest and Bird | IM-P12 | 00230.036 | <p>Amend as follows: “</p> <p>...</p> | Oppose | OceanaGold opposes the removal of the ability to offset or compensate adverse effects. | Disallowed. |

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| | | | <p>(3) adverse effects on the environment that cannot be avoided, remedied, or mitigated are offset, or compensated for if an offset is not possible, in accordance with any specific criteria for using offsets or compensation, and ensuring that any offset is: (a) undertaken where it will result in the best ecological outcome, (b) close to the location of the activity, and (c) within the same ecological district or coastal marine biogeographic region,</p> <p>(4) the activity will not impede either the achievement of the objectives of this RPS or the objectives of regional policy statements in neighbouring regions, and</p> <p>(5) the activity will not contravene a bottom line set in a national policy statement or national environmental standard, and (6) there are no other reasonable alternatives, including changes in the nature or scale of associated activities."</p> | | The addition of clause (6) also infers that an alternatives assessment will be required in all circumstances, which is not consistent with the RMA which only requires alternative assessments to be undertaken in certain circumstances. | |
| Trojan Holdings | IM-P13 | 00206.00 | <p>Amend as follows:</p> <p>IM-P13 – Managing cumulative effects Otago’s environmental integrity, form, function, and resilience, and opportunities for future generations, are protected by recognising and specifically managing the cumulative effects of activities on <u>the environment</u> natural and physical resources in plans and explicitly accounting for <u>addressing</u> these effects in other resource management decisions.</p> | Support | The amendments improve the application of this policy and are supported. | Allowed. |
| Federated Farmers of New Zealand | IM-P15 | 00239.045 | Delete | Support | OceanaGold agrees that the appeal to the precautionary principle under this proposed policy is subjective and does not provide effective policy guidance. This policy could be deleted or alternatively it could be amended to ensure it enables adaptive management use as part of the application of the precautionary approach. | Allowed. |
| Dunedin City Council | CE – P4 | 00139.065 | Amend to reflect general comments re use of the word ‘avoid’. | Support | OceanaGold considers that this submission point applies more broadly than the coastal chapter. OceanaGold agrees that the use of the term “avoid” should be carefully considered before it is applied in any direction in the RPS. | Allowed. |
| Beef & Lamb NZ and Deer Industry NZ | LF – General | 00237.024 | <p>Overhaul the pORPS as per paragraphs 13 – 30 in submission, in summary:</p> <ul style="list-style-type: none"> • should add clarity and substance to the direction in national level regulation like the RMA, not simply repeat it. • Address gap in framework around NPS – FM; pORPS does not refer to identification of values which is required for environmental outcomes and definition of over-allocation. | Support | OceanaGold supports ensuring consistency with national policy including the NPSFM. | Allowed. |

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| | | | <ul style="list-style-type: none"> • Te Taiao, or nature, is distanced as the ‘other’ by excluding humans from it throughout the pORPS, rather than recognising humans as an inextricable part of it, not just influence on it, through ki uta ki tai. • Resilience should have formed the foundation of the pORPS. • Regulation and then people need to place biodiversity at the heart of environmental management. • Undertake the necessary research, analysis, and evaluation to understand Otago’s soil and water resources before redrafting the LF chapter. • Better align the LF chapter with the NPS – FM and National Policy Statement for Highly Productive Land (NPS – HPL) when it is made operative. | | | |
| Greenpeace Aotearoa | LF – New provision | 00407.005 | Include the following provision in the Land and Freshwater Chapter: Identify limits based on environmental impacts. | Oppose in part | OceanaGold seeks to ensure any limits are appropriately and consistently developed. | Disallowed. |
| Federated Farmers of New Zealand | LF – New provision | 00239.075 | - Insert new method M2 to give effect to the other components of Te Mana o Te Wai, to give practical effect to the matters in P1 as proposed below. - Adopt a new method as above and move existing LF – WAI – M2 to become LF – WAI – M3. “LF – WAI – M2 Practical implementation of Te Mana o Te Wai (1) The Otago Regional Council will give practical effect to LF – WAI – P2 by: Facilitating the practical use of matauraka Maori, such as through cultural flow preference studies, and other methods (2) Undertaking and supporting detailed hydrological, ecological, habitat, and soil studies to support integrated management of water (3) Undertaking and supporting social and economic studies to maintain or enhance social and economic wellbeing where transitions are required. “ | Support | OceanaGold supports the focus of the submitter’s proposed amendments which assist in providing certainty and clarity as to the implementation of ‘Te mana o te Wai’ as set out in the NPSFM. | Allowed. |
| Federated Farmers of New Zealand | LF – WAI – O1 | 00239.069 | <p>Amend as follows:</p> <p>“The mauri of Otago’s water bodies and their health and well-being is protected, and restored where it is degraded, and the management of land and water recognises and reflects that:</p> <p><u>The health and wellbeing of Otago’s water bodies is protected, and improved where it is degraded, and the management of the land and water recognises and reflects that:</u></p> <p><u>(1) Protecting the health of water protects the wider environment and the mauri of water;”</u></p> | Support | OceanaGold supports the focus of the submitter’s proposed amendments (below) which promote the protection - or where degraded, improvement – of significant water resources because this results in improved consistency with ‘Te mana o te Wai’ as set out in the NPSFM. | Allowed. |

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| Dunedin City Council | LF – WAI – P1 | 00139.081 | Consider providing clarification or adding a new policy on priorities when there is conflict between them; e.g. housing development and water needed for drinking water with potential effects on the health and well-being of a water body. | Support | OceanaGold agrees that greater certainty as to how conflicts between competing uses could be useful. | Allowed. |
| Federated Farmers of New Zealand | LF – WAI – M1 | 00239.074 | Revise M1 to ensure consistency with the scope of Te Mana o Te Wai, and other matters to go into a general partnership method. | Support | OceanaGold agrees that consistency with scope of Te Mana o Te Wai is appropriate. | Allowed. |
| New Zealand Infrastructure Commission | LF – WAI – P3 | 00321.030 | Retain as notified Submitter notes contradiction with provision LF – WAI – P1 | Support | OceanaGold agrees that the drafting of this policy is generally appropriate and should be retained | Allowed. |
| Fonterra Cooperative Group Limited | LF – WAI – P3 | 00213.034 | Amend to recognise the need for people and communities to use water in various ways and the acceptability of this where it occurs within appropriate limits including as a minimum an amendment to Policy LF – WAI – P3(4) as follows: (4) <u>ensures that as people use and develop land and water they do so in a way and at a rate that maintains and enhances</u> manages the effects of the use and development of land to maintain and enhance the health and well-being of freshwater and coastal water | Support | OceanaGold agrees that it is appropriate to recognise the need for people and communities to use water in various ways at a rate which maintain and enhances freshwater and coastal resources. | Allowed. |
| Beef & Lamb NZ and Deer Industry NZ | LF – VM – P6 | 00237.030 | Amend policy so that it properly reflects the requirements of the NPSFM. | Support | OceanaGold agrees that it is appropriate to ensure the ORPS gives effect the NPSFM. | Allowed. |
| Director-General of Conservation | LF – FW – O8 | 00137.070 | insert the following new clauses or words to like effect: “x. fresh water sustains indigenous aquatic life”, “x. non – diadromous galaxiid and Canterbury mudfish populations and their habitats are protected” “x. habitats that are essential for specific components of the life cycle of indigenous species, including breeding and spawning grounds, juvenile nursery areas, important feeding areas and migratory and dispersal pathways, are protected” “x. changes to flows, fish passage or fish barriers only occur where doing so would not enable the passage of undesirable fish species where it is considered necessary to prevent their passage in order to protect desired fish species, their life stages, or their habitats. | Oppose in part | OceanaGold opposes the additional clauses being inserted into this objective. These matters are already inherent in the drafting of the objective (if they are applicable to the given water body). | Disallowed. |
| Beef & Lamb NZ and Deer Industry NZ | LF – FW – O9 | 00237.033 | Amend as follows: – Clause (1) to provide better clarity on what needs to be enhanced, to what level, what the endpoint of enhancement is. – Clause (2) to provide clarity on what ‘the range’ means. | Neither support or oppose | OceanaGold generally agrees with the amendments being proposed by the submitter for the reasons set out in the submission. | Allowed. |

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| | | | – Clause (3) to identify an end state for improvement. – Further amend clause (3) as follows: ...hydrological functioning, amenity values , extent or water quality... | | | |
| Transpower New Zealand Limited | LF – FW – O10 | 00314.022 | Retain as notified. | Support | OceanaGold agrees that the drafting of this objective is appropriate and should be retained. | Allowed. |
| Beef & Lamb NZ and Deer Industry NZ | LF – FW – P7 | 00237.035 | Remedy sought is that ORC undertake the relevant and necessary analysis to inform this sort of regulatory instrument. Once this has been done, replace provision with one based on analysis of current state and costs of achievement, and in line with the NPS – FM. | Support | OceanaGold considers it appropriate to ensure accurate alignment with the NPSFM. | Allowed. |
| Meridian Energy Limited | LF – FW – P7 | 00306.034 | Amend as follows: “Environmental outcomes, attribute states (including target attribute states) and limits ensure that: (1) ... (2) the habitats of <u>significant</u> indigenous species associated with water bodies are protected, including by providing for fish passage, (3) ... | Support | OceanaGold agrees that the drafting of this policy as notified is too absolute and could mean that the environmental outcomes, attribute states and limits must protect any habitat of a single (or multiple) indigenous plant or animal that is associated with a water body, whether in it or near it. The amendments being sought by the submitter improve this policy. | Allowed. |
| Toitū Te Whenua, Land Information New Zealand | LF – LS – General | 00101.022 | Priority should be given to limiting the extent of future land use change which would adversely impact inherent values of the land, specifically the soil. [Note: submitter has listed this point against IM – P1] | Oppose | OceanaGold considers this provision to be too uncertain and is not appropriate. | Disallowed. |
| Fulton Hogan Limited | LF – LS – General | 00322.025 | Amend as follows: Combine LF – LS – AER12 and LF – LS – AER13 to remove reference to soil resources and to instead rely on the term highly productive land. LF – LS – AER12 The life – supporting capacity, of soil is <u>availability and capability of Otago’s highly productive land is maintained or improved throughout Otago.</u> | Support | OceanaGold supports the approach being suggested by the submitter in terms of ensuring the maintenance and improvement of the availability and capability of Otago’s highly productive land. | Allowed (subject to remedying any typographical error in proposed amendment). |
| Director-General of Conservation | LF – LS – New provision | 00137.076 | Insert new objectives as follows or words to like effect: “x. Otago’s land environments support healthy habitats for indigenous species and ecosystems” “x. Land use activities in Otago are managed in a way which recognises and protects terrestrial, freshwater and coastal values which land use activities could affect either directly or indirectly. | Oppose in part | OceanaGold considers that these matters are sufficiently addressed in other chapters of the ORPS and do not need to replicated here. | Disallowed. |
| Alluvium Ltd and Stoney Creek Mining Ltd | LF – LS – O11 | 00016.009 | Clarify the wording around “primary production” due to its broad nature. For instance, there should be no preference for mineral extraction occurring on highly productive land. | Support | OceanaGold agrees that the term “primary production” is broad and the ORPS should seek to recognise and provide for all activities within this definition. | Allowed. |
| K āi Tahu ki Otago / Aukaha | LF – LS – O11 | 00226.199 | Amend as follows: Replace use of “primary production” with reference to outdoor agricultural, pastoral and horticultural production or a defined term that clearly excludes | Oppose | The definition of primary production is consistent with contained in the National Planning Standards and is appropriate on this basis, the proposed exclusions are not appropriate. | Disallowed. |

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| | | | mining, quarrying, forestry and production of commodities within buildings | | | |
| Fulton Hogan Limited | LF – LS – O11 | 00322.021 | <p>Amend as follows: Remove reference to soil resources and to instead rely on the term highly productive land. “The life – supporting capacity, of Otago’s soil resources is safeguarded and the availability and productive capacity of highly productive land for primary production is maintained now and for future generations.”</p> <p>AND Associated amendments to LF – LS – E4 – Explanation, and LF – LS – PR4 – Principal reasons, may be required to align these statements with the proposed amendments</p> | Support | OceanaGold considers the intent of these amendments to be appropriate. | Allowed (subject to remedying any typographical error in proposed amendment). |
| Mt Cardrona Station | LF – LS – O12 | 00014.026 | <p>Ensure that soil protective policies are appropriately aimed at just those highly productive or regionally significant soils Allow for productive capacity assessments to take into account a range of factors beyond LUC classification, including such as alternative efficient uses, prices of land, proximity to infrastructure and urbanisation, past profitability records, other resource availability. Reference competing resource uses in these policies, recognising that there may be a need to weigh and balance protection of significant soils against other appropriate growth and development objectives (such as housing and infrastructure) and recognising that this is consistent with the Government Urban Growth Agenda (to develop out and up) as well as the NPS – UD 2020 which anticipates greenfield development. Amend these policies to remove a preference for traditional rural production activities over other uses of significant soils which are appropriate and efficient</p> | Support | OceanaGold seeks to ensure all productive uses of the land and soil resource and appropriately provided for as part of the ORPS. | Allowed. |
| Fulton Hogan Limited | LF – LS – O12 | 00322.022 | <p>Amend as follows: Remove reference to soil quality as this is addressed through Objective LF – LS – O11. “The use of land in Otago maintains soil quality and contributes to achieving environmental outcomes for fresh water.”</p> <p>AND Associated amendments to LF – LS – E4 – Explanation, and LF – LS – PR4 – Principal reasons, may be required to align these statements with the proposed amendments</p> | Support | OceanaGold considers these amendments to be appropriate. | Allowed. |

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| New Zealand Infrastructure Commission | LF – LS – P16 | 00321.034 | Retain as notified | Support | OceanaGold agrees with the submitter that this policy is appropriate and should be retained. | Allowed. |
| Graymont (NZ) Limited | LF – LS – P18 | 00022.019 | Amend as follows: ... (2) maintaining vegetative cover on erosion – prone land, <u>to the extent practicable</u> , and | Support | OceanaGold agrees with the submitter that there is an element of practicability associated with maintaining vegetation cover (e.g. climatic conditions), and it is appropriate to recognise this. | Allowed. |
| Matakanui Gold Limited | LF – LS – P19 | 00021.006 | Amend to provide for mining, to recognise its functional and operational needs and clarify the relationship between mining and the land use of Highly Productive Land. | Support | OceanaGold supports this submission for the reasons set out in its submission. | Allowed. |
| Trojan Holdings Limited (Trojan) | LF – LS – P19 | 00206.040 | Amend as follows: (1): identifying <u>and mapping</u> highly productive land based on the following criteria: | Support in part | OceanaGold agrees that some certainty could be appropriate via a mapping exercise. However this exercise needs to ensure it does not inappropriately or inadvertently prevent all activities that are considered to be productive use of land or soils. | Allowed. |
| Alluvium Ltd and Stoney Creek Mining Ltd | LF – LS – P21 | 00016.011 | Amend as follows: Achieve the improvement or maintenance of fresh water quantity or quality to meet environmental outcomes set for Freshwater Management Units and/or rohe by: 1. <u>where practicable</u> , reducing direct and indirect discharges of contaminants to water from the use and development of land, and | Support | OceanaGold supports the amendments as it may be that such discharges do not result in any adverse effects and therefore a reduction is not a necessary requirement. | Allowed. |
| Beef & Lamb NZ and Deer Industry NZ | LF – LS – M11 | 00237.048 | Delete provision or move it to LF – FW. | Support | OceanaGold agrees with the submitter that method could be deleted or moved to the freshwater chapter. | Allowed. |
| Alluvium Ltd and Stoney Creek Mining Ltd | LF – LS – M12 | 00016.012 | Amend as follows: Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to: 1. manage land use change by: ... b. minimising the removal of tall tussock grasslands, and | Support | OceanaGold supports the amendments being proposed by the submitter. | Allowed. |
| Danny Walker, Peter Hall, Cold Clutha Ltd and Awa Koura Mining Ltd | LF – LS – M12 | 00017.010 | Amend as follows: Territorial authorities must prepare or amend and maintain their district plans no later than 31 December 2026 to: 1. manage land use change by: ... b. minimising the removal of tall tussock grasslands, and | Support | OceanaGold supports the amendments being proposed by the submitter. | Allowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | LF – LS – M12 | 00230.095 | Amend as follows: “... (1)(b) <u>avoiding</u> minimising the removal of tall tussock grasslands, and ...” | Oppose | Avoidance sets too high a threshold and there are other methods that could be implemented to appropriately manage adverse effects on tussock grasslands. | Disallowed. |
| Wise Response Society Inc | LF – LS – M12 | 00509.092 | Amend as follows:... (1)(b) <u>prohibiting</u> the removal of tall tussock grassland... | Oppose | Avoidance sets too high a threshold and there are other methods that could be implemented to appropriately manage adverse effects on tussock grasslands. | Disallowed. |
| Silver Fern Farms | LF – LS – P21 | 00221.010 | Amend as follows: ... | Support | OceanaGold agrees that it would be appropriate to manage adverse effects of discharges, rather than require the reduction in all circumstances. | Allowed. |

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| | | | a. managing the adverse effects of reducing direct and indirect discharges of contaminants to water from the use and development of land, and | | | |
| Dunedin City Council | ECO – General | 00139.129 | Amend as follows: -any amendments required to implement NPS Indigenous Biodiversity - Provide definition of ‘kai tahi values’ in this context To address issue regarding requirement to avoid effects on values that are not identified in plans – e.g. by providing an exemption from the policy in this case | Support | OceanaGold considers it appropriate to ensure the ORPS is consistent with national policy outcomes and requirements. OceanaGold also agrees that the use of the term avoidance needs to be carefully considered before it is used in the ORPS for the reasons set out in its submission. | Allowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | ECO – General | 00230.096 | Amend the ECO provisions to: - Ensure that all areas meeting the APP2 significance criteria are to be protected - That values identified through mapping will be schedules in the plan but will not be used as a comprehensive list. - That resource consents will include assessment to identify values of any area which meets the significance criteria to provide the best and most recent information - Direct regional and district councils to map significant natural areas within the coastal environment. | Oppose | OceanaGold opposes this submission for the reasons set out in its submission. | Disallowed. |
| TrustPower Limited | ECO – General | 00311.027 | Amend as follows: Amend APP2, APP3; and APP 4 appendices to align with current best practice. | Support | OceanaGold considers it appropriate to align the ORPS with best practice. | Allowed. |
| Director General of Conservation | ECO-O1 | 00137.083 | Insert the following additional points into the objective: - “That there is no worsening of the threat classification of indigenous threatened species in Otago; - In the term of the RPS the threat classification of threatened indigenous species in Otago will be improved; - Areas of significant indigenous biodiversity will be mapped and protected; and - Threatened ecosystems will be protected in Otago” | Oppose | It is appropriate to ensure there is no worsening of the threat classification as a direct result of any activity however OceanaGold considers that there may be practical constraints which limit the ability to “improve” the threat classification of a species. | Disallowed. |
| Kai Tahu ki Otago / Aukaha | ECO-O1 | 00226.214 | Amend as follows: <u>The full range of Otago’s</u> indigenous biodiversity is healthy and thriving and any decline in quality, quantity and diversity is halted. | Oppose | OceanaGold considers the addition of the “full range” to be unduly onerous. | Disallowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | ECO-O2 | 00230.098 | Amend as follows: “A net increase in the extent, quality, quantity and occupancy diversity of Otago’s indigenous biodiversity results from restoration or <u>enhancement</u> and improvement.” | Oppose | OceanaGold opposes this amendment as the terms are too subjective, and seek to inappropriately replace recognised ecological terms. | Disallowed. |
| Otago Fish & Game Council and the Central South Island Fish & Game Council | ECO-P8 | 00231.073 | Amend as follows: (4) promoting the use and development of resources which support 1-3 above. | Support | OceanaGold agrees that it is necessary to recognise that development and use of resources can also achieve positive ecological and biodiversity outcomes. This includes through the use of offsetting and compensation measures. | Allowed. |

| Submitter | Provision | Original submission point number | Submission Summary | Support OR Oppose | The reasons for my support/opposition are: | I seek that the whole (or part [describe part]) of the submission be allowed (or disallowed): [Please state]. |
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| Royal Forest and Bird Protection Society of New Zealand Incorporated | ECO-P8 | 00230.107 | Amend as follows: “ECO – P8 – Enhancement Restoration and improvement The extent, occupancy and condition of Otago’s indigenous biodiversity is increased by: (1) restoring and enhancing <u>improving</u> habitat for indigenous species, including taoka and mahika kai species, (2) improving the health and resilience of indigenous biodiversity, including ecosystems, species, important ecosystem function, and intrinsic values, and (3) buffering or linking ecosystems, habitats and ecological corridors.” | Oppose | OceanaGold opposes the amendments as the term “enhance” is more commonly used throughout the RMA. | Disallowed. |
| Trojan Holdings Limited | ECO-P8 | 00206.045 | Amend: (4) promoting subdivision, use and development of resources which support 1 – 3above. | Support | OceanaGold agrees that it is necessary to recognise that development and use of resources can also achieve positive ecological and biodiversity outcomes. This includes through the use of offsetting and compensation measures. | Allowed. |
| Maryhill Limited Mt Cardrona Station | ECO-P10 | 00118.039 00014.39 | Ensure polices do not unfairly penalise or restrict landowners from use and development of resources where they have added to indigenous biodiversity voluntarily in the past. Include in this chapter, the consideration of indigenous biodiversity enhancements as a positive effect resulting from growth and development proposals, or the potential for this to be used as offsetting where necessary / appropriate. Clarify where and when restoration may be appropriate, rather than requiring it. Amend provisions to recognise some circumstances where development is appropriate that has an effect on biodiversity, or in SNAs where this gives effect to national direction, such as the NPS – UD 2020. Ensure that biodiversity to be protected (e.g. SNAs) are only designated in accordance with fair and reasonable consultation processes, and incentives and mechanisms relating to control of pests take a collaborative approach with landowners. Amend the provisions to remove a preference for retaining landscapes in their current form, and recognise the benefits of change to landscape values and character as a result of growth and planning (for example through mitigation, landscaping, planting and biodiversity enhancement). ensure that landscape mitigation and biodiversity offsetting are taken into account as positive matters when considering improvements to natural character and landscapes. | Support | OceanaGold agrees with the submitter on this matter. | Allowed. |

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| Royal Forest and Bird Protection Society of New Zealand Incorporated | ECO-P10 | 00230.109 | Amend as follows: “Implement an integrated and co – ordinated approach to managing Otago’s ecosystems and indigenous biodiversity that: (1) ensures any permitted or controlled activity in a regional or district plan rule <u>which has potential for adverse effects on indigenous biodiversity would not result in a more than minor adverse effect and would protect significant natural areas in accordance with ECO – P3</u> | Oppose | OceanGold does not consider the amendment being sought by the submitter to be appropriate. It is not clear how this would be implemented in the lower order plans. | Disallowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | ECO-M1 | 00230.110 | Amend as follows: (1) the Regional Council and territorial authorities are responsible for specifying objectives, policies and methods in regional and district plans for managing maintain indigenous biological diversity <u>within</u> the margins of wetlands, rivers and lakes, ... (3) in addition to (1) , territorial authorities are responsible for specifying objectives, policies and methods in district plans outside of the areas listed in (2) above if they are not managed by the Regional Council under (4), and (4) the Regional Council may be <u>solely</u> responsible for specifying objectives, policies and methods in regional plans outside of the areas listed (4 3) above if... | Oppose | The reference to managing should be retained. | Disallowed. |
| Waitaki District Council | ECO-M2 | 00140.025 | [Specific changes not identified] The PRPS is not stronger than National Direction | Support | It is appropriate to align with national direction. | Allowed. |
| Federated Farmers of New Zealand | ECO – M3 | 00239.106 | Delete ECO – M3 | Support in part | It may be appropriate to delete this method as there are uncertainties with it. | Allowed. |
| Federated Farmers of New Zealand | ECO-M4 | 00239.107 | Ensure consistency with final NPSIB as to District and Regional Plan requirements | Support | It is appropriate to ensure consistency with the NPSIB. | Allowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | ECO-M4 | 00230.113 | Amend as follows: (X) in all cases consider whether it may be appropriate to grant consent with conditions or for consent to be declined due to locational circumstances and to achieve other policy and objectives of the RPS.” | Oppose | OceanaGold does not consider the addition of (x) to be appropriate and should be deleted. | Disallowed. |
| Federated Farmers of New Zealand | ECO-M5 | 00239.108 | Ensure consistency with final NPSIB as to District and Regional Plan requirements | Support | It is appropriate to ensure consistency with the NPSIB. | Allowed. |
| Dunedin City Council | ECO-M5 | 00139.138 | Amend to delete ECO – M5(1). Clarify whether the intention is that resource consent applications triggered by district plans are directly assessed against ECO – P6, or that territorial authorities incorporate this policy into district plans. | Support | OceanaGold agrees that it is appropriate to delete ECO-M5(1). Clarification of the intention of ECO-P6 is also necessary. | Allowed. |
| Royal Forest and Bird Protection Society of | ECO-M5 | 00230.114 | Amend as follows: (X) in all cases consider whether it may be appropriate to grant consent with conditions or for consent to | Oppose | OceanaGold does not consider the addition of (x) to be appropriate and should be deleted. | Disallowed. |

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| New Zealand Incorporated | | | be declined due to locational circumstances and to achieve other policy and objectives of the RPS.” | | | |
| New Zealand Infrastructure Commission | EIT – General | 00321.105 | Heritage should be appropriately balanced against infrastructure’s essential contribution to societal wellbeing. | Support | OceanaGold agrees that it is necessary to balance infrastructure with heritage requirements. This can also apply to other development and land use activities that contribute significantly to the economic, cultural and social wellbeing of the region. | Allowed. |
| Matakanui Gold Limited | EIT- New-Provision | 00021.010, 00021.012, 00021.013 – 018 | Insert various new mining related provisions. | Support | OceanaGold agrees that the ORPS should appropriately enable mining activities. | Allowed. |
| Sanford Ltd. | HAZ – NH – General | 00122.030 | Amend Policy HAS NH P2, HAZ NH P3 and HAZ NH P4, Method HAZ–NH–M3 – Regional plans, Method HAZ–NH–M4 – District plans, and APP6 - Methodology for natural hazard risk assessment, to the extent required so that they do not direct individual developments be avoided where significant natural hazard risk can be suitably mitigated at that site for a particular development | Support | OceanaGold agrees that certain developments should not be avoided, if the natural hazard risk can be suitably managed. | Allowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | HAZ – NH – O1 | 00230.135 | Amend as follows: “Levels of risk to people, communities, <u>ecosystem health, indigenous biodiversity</u> , and ...” | Oppose | OceanaGold opposes the addition clauses to this objective. It is not clear what ramifications this would have in terms of risk identification, assessment and management was also required for ecosystem health and indigenous biodiversity. | Disallowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | HAZ – NH – P1 | 00230.137 | Amend as follows: “... communities, <u>ecosystem health, indigenous biodiversity</u> , and property by assessing: ...” | Oppose | OceanaGold opposes the addition clauses to this objective. It is not clear what ramifications this would have in terms of risk identification, assessment and management was also required for ecosystem health and indigenous biodiversity. | Disallowed. |
| New Zealand Infrastructure Commission | HAZ – NH – P2 | 00321.075 | Amend as notified: Clarify the circumstances in which such assessments are directed to be carried out | Support | OceanaGold agrees that this amendment would improve the application of this policy. | Allowed. |
| Aurora Energy Limited | HAZ – NH – P3 | 00315.061 | Amend as follows: “Once the level of natural hazard risk associated with an activity has been determined in accordance with HAZ – NH – P2, manage new activities to achieve the following outcomes: (1) when the natural hazard risk is significant, the activity is avoided <u>unless the activity is nationally or regionally significant infrastructure that has a functional need or operational need for its location and the risk is appropriately managed, ...</u> ” | Support | OceanaGold agrees that certain developments should not be avoided, if the natural hazard risk can be suitably managed. This is particularly the case with infrastructure or mining activities for example, that have a functional or operational need to be located in certain areas, and cannot be established or relocated to other “lower natural hazard risk” locations. | Allowed. |
| Transpower New Zealand Limited | HAZ – NH – P3 | 00314.044 | Amend policy as follows: “Once the level of natural hazard risk associated with an activity has been determined in accordance with HAZ – NH – P2, manage new activities to achieve the following outcomes: 1. when the natural hazard risk is significant, the activity is avoided <u>unless the activity is nationally significant infrastructure that has a</u> | Support | OceanaGold agrees that certain developments should not be avoided, if the natural hazard risk can be suitably managed. This is particularly the case with infrastructure or mining activities for example, that have a functional or operational need to be located in certain areas, and cannot be established or relocated to other “lower natural hazard risk” locations. | Allowed. |

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| | | | <u>functional need or operational need for its location and the risk is appropriately managed,</u> | | | |
| Dunedin City Council | HAZ – NH – P5 | 00139.198 | Clarify what the ‘precautionary approach’ is, and how it will be applied. | Support | OceanaGold agrees that greater clarification as to how this policy will be applied would be helpful. | Allowed. |
| Mt Cardrona Station | HAZ – NH – P5 | 00014.058 | Allow for a balanced approach to considering risks from natural hazards over the lifetime of the development under consideration. Take into account all mitigation measures applicable when determining any risk assessment. Only apply precaution where scientific information is not available and where effects are likely to be significant and adverse | Support | OceanaGold agrees that a balanced approach to managing natural hazard risk is necessary. | Allowed. |
| Federated Farmers of New Zealand | HCV – WT – P2 | 00239.150 | Amend as follows: “Wāhi tūpuna are protected and managed by: (1) avoiding significant adverse effects of <u>inappropriate subdivision, use and development</u> on the cultural values associated with identified wāhi tūpuna, (2) where adverse effects demonstrably cannot be completely avoided, remedying or mitigating adverse effects in a manner that maintains the values of the wāhi tūpuna, (3) managing identified wāhi tūpuna in accordance with tikaka Māori, (4) avoiding managing any activities that may be considered inappropriate in wāhi tūpuna as identified by Kāi Tahu, and (5) encouraging the enhancement of access to wāhi tūpuna to the extent compatible with the particular wāhi tūpuna <u>and with landowner consent.</u> ” | Support | OceanaGold supports the amendments on the basis that they improve the certainty and application of this policy. | Allowed. |
| Alluvium Ltd and Stoney Creek Mining Ltd | UFD – P7 | 00016.024 | Amend as follows: The management of rural areas: ... <u>8. provides for mineral exploration, extraction and processing.</u> | Support | OceanaGold considers that it is appropriate to ensure that the ORPS appropriately provides for mining activities within the region. | Allowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | UFD – P7 | 00230.145 | Amend as follows: “The management of rural areas: <u>(X) provides for the maintenance and protection of indigenous biodiversity in accordance with BIO chapter.</u> | Oppose | OceanaGold does not agree that this amendment is necessary in this chapter. | Disallowed. |
| New Zealand Infrastructure Commission | UFD – P7 | 00321.095 | AND Other references in the existing clauses to ‘operational’ need should also be expanded to refer to ‘functional need’ as well (noting that the two defined concepts are related but different in important ways – so both need to be included). | Support | It is appropriate to recognise that certain activities have operational and/or functional constraints that need to be appropriately accounted for. | Allowed. |
| Meridian Energy Limited | NFL – General | 00306.073 | Amend as follows: For NFL – M, NF - E, NFL – PR and NFL – AER, delete all references to highly valued | Support | OceanaGold agrees with the submitter that there is no directive under the RMA to identify and manage highly valued natural features and landscapes. | Allowed. |

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| | | | natural features and landscapes in the NFL methods, explanations, principal reasons and anticipated environmental results | | | |
| Meridian Energy Limited | NFL – O1 | 00306.068 | Amend as follows: “NFL – O1 – Outstanding and highly valued natural features and landscapes The areas and values of Otago’s outstanding and highly valued natural features and landscapes are identified, and the use and development of Otago’s natural and physical resources results in: (1) the protection of outstanding natural features and landscapes, and (2) the maintenance or enhancement of highly valued natural features and landscapes. ” | Support | OceanaGold agrees with the submitter that there is no directive under the RMA to identify and manage highly valued natural features and landscapes. | Allowed. |
| Meridian Energy Limited | NFL – P1 | 00306.069 | Amend as per submission. | Support | OceanaGold agrees with the submitter that there is no directive under the RMA to identify and manage highly valued natural features and landscapes. | Allowed. |
| Meridian Energy Limited | NFL – P4 | 00306.071 | Amend as follows: “Promote restoration of the areas and values of outstanding and highly valued natural features and landscapes where those areas or values have been reduced or lost. “ | Support | OceanaGold agrees with the submitter that there is no directive under the RMA to identify and manage highly valued natural features and landscapes. | Allowed. |
| Queenstown Airport Corporation | APP2 – Significance criteria for indigenous biodiversity | 00313.033 | Amend as follows: Significance Criteria is amended to ensure indigenous biodiversity are aligned with best practice or national policy direction and are specific and targeted enough to avoid the classification of inappropriate areas as SNAs | Support | OceanaGold considers it appropriate to align APP2 with national policy direction and/or best practice. It is also appropriate to avoid inappropriate classification of other areas. | Allowed. |
| Royal Forest and Bird Protection Society of New Zealand Incorporated | APP3 – Criteria for biodiversity offsetting | 00230.148 | Amend as follows: “(1)(b) reasonably measurable loss within the ecological district <u>or coastal marine biogeographic region</u> to an At Risk – Declining taxon, other than mānuka (Leptospermum scoparium) , under the New Zealand Threat Classification System (Townsend et al, 2008).” - Add to the criteria under (2) as follows: “(j) <u>limits to offsetting have been observed, including where the loss of rare or vulnerable species or a naturally rare or uncommon ecosystem type makes an offset inappropriate or where there is uncertainty of success</u> ” Add a footnote to the word “observed” that this means the decision maker must take these considerations into account. | Oppose in part | OceanaGold opposes the changes for the reasons set out in its submission relating to the inappropriate limits to offsetting. | Disallowed. |
| Te Ao Marama | APP3 – Criteria for biodiversity offsetting | 00223.134 | - Amend (1)(b) to remove the exception for mānuka and kānuka. Mānuka and kanuka require macrons over the first ‘ā’s | Oppose | OceanaGold does not agree that it is appropriate to remove the exception for mānuka and kanuka. These are common throughout Otago. | Disallowed. |
| Royal Forest and Bird Protection Society of | APP4 – Criteria for biodiversity | 00230.149 | Amend as follows: “(1)(c) removal, or loss or decline in the quality of <u>viability</u> of a naturally rare or uncommon ecosystem | Oppose | OceanaGold opposes the changes for the reasons set out in its submission relating to the inappropriate limits to compensation. | Disallowed. |

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| New Zealand Incorporated | compensation | | type that is associated with indigenous vegetation or habitat of indigenous fauna,..." - Add to the criteria under (2) as follows: <u>"(x) limits to compensation have been observed, including where the loss of rare or vulnerable species or a naturally rare or uncommon ecosystem type makes an offset inappropriate or where there is uncertainty of success" Add a footnote to the word "observed" that this means the decision maker must take these considerations into account</u> | | | |
| Blackthorn Lodge Glenorchy Limited | APP6 – Methodology for natural hazard risk assessment | 00119.028 – 00119.033 | Amendments to Appendix 6. | Support in part | OceanaGold considers it appropriate that APP6 is consistent with best practice methodology for natural hazard assessment. | Allowed. |
| Dunedin City Council | APP6 – Methodology for natural hazard risk assessment | 00139.141 | - Review the species listed in APP6 based on ecological evidence specific to Otago (unless this has already been done during preparation of the RPS), and also consideration of whether it is necessary for regional and district plans to control species that are managed under the Biosecurity Act. Consider management via the RPS of species that are not conifers but that have significant invasive potential. This would involve consequential changes to APP6 and other provisions in the RPS that refer to wilding 'conifers' only, including ECO – P9, ECO – M5, ECO – AER4, NFL – P5, etc. | Neither support nor oppose | OceanaGold considers species review and management of species with invasive potential should be considered. | Allowed |
| Trojan Holdings Limited (Trojan) | APP6 – Methodology for natural hazard risk assessment | 00206.075 & 00206.076 | Amendments to Appendix 6. | Support in part | OceanaGold considers it appropriate that APP6 is consistent with best practice methodology for natural hazard assessment. | Allowed. |
| Wayfare Group Ltd | APP6 – Methodology for natural hazard risk assessment | 00411.090 - 00411.095 | Amendments to Appendix 6. | Support in part | OceanaGold considers it appropriate that APP6 is consistent with best practice methodology for natural hazard assessment. | Allowed. |
| Meridian Energy Limited | APP9 – Identification criteria for outstanding and highly valued natural features, | 00306.085 | Amend as follows: "APP9 – Identification criteria for outstanding and highly valued natural features, landscapes and seascapes The areas and the values of outstanding and highly valued natural features, landscapes and seascapes are identified using the following attributes:..." | Support | OceanaGold agrees with the submitter that there is no clear directive under the RMA to identify and manage highly valued natural features and landscapes. | Allowed. |

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| | landscapes and seascapes | | AND Make all consequential amendments to the pORPS21 to give full effect to the preceding submissions. | | | |
| Mt Cardrona Station | APP9 – Identification criteria for outstanding and highly valued natural features, landscapes and seascapes | 00014.065 | Remove avoidance language Recognise that for section 7 amenity landscapes, those must also be identified and scheduled rather than being default rural land that is not ONFL, and protection of these should be relevant to landscape character, rather than landscape per se Remove recognition of highly valued section 7 landscape matters, as these are essentially amenity landscapes, the concept of which is not proposed to be included in replacement RMA legislation Where provisions may be in conflict with other national objectives, such as through the NPS – UD 2020, or otherwise where proposals have significant social and economic benefits, the latter should take precedence Promote restoration and enhancement, including through planting and other mitigation, as a relevant positive matter or otherwise an offsetting mechanism, in considering development proposals Ensure that landscape capacity assessments, and ability to change landscape character, are relevant to change of landscape quality as well as character Recognise a differential level of character and values for landscapes that are open, modified, or otherwise degraded, as opposed to truly 'natural' and unmodified landscapes (both at a policy and objective level, as well as at a schedule level when identifying landscapes) Clarify the scale at which landscapes are to be assessed, particularly when forming capacity assessments, and the size and extent of ONF/L | Support | OceanaGold agrees that if section 7 landscapes are going to be retained in the ORPS, there needs to be an appropriately nuanced approach in terms of their identification and subsequent management. | Allowed. |