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**SECOND BRIEF OF SUPPLEMENTARY EVIDENCE OF JACQUELINE ANN TODD  
SRMR (MINERAL EXTRACTION)**

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**Qualifications and Experience**

- 1 My qualifications and experience are set out in paragraphs 11 to 13 of the section 42A report titled *Chapter 5: Submissions on Part 2 – Resource management overview* and dated 4 May 2022. I am the author of the ‘Significant Resource management issues for the region’ (SRMR) section of that report.

**Code of Conduct**

- 2 I have read and agree to comply with the Environment Court’s Code of Conduct for Expert Witnesses, contained in the Environment Court Practice Note 2023. I have complied with the Code in preparing my evidence. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

**Scope of Evidence**

- 3 On 27 January 2023, the Hearing Panel directed in Minute 5:<sup>1</sup>
- “...s.42A report writers to reconsider whether to advance potential amendments to various affected chapters of the pOPRS to address effects arising from any potential consent pathway for mineral extraction activities, in response to evidence advanced by Claire Hunter for Oceana Gold (NZ) Limited”.*
- 4 This supplementary statement of evidence provides my response to the amendments sought by Ms Claire Hunter for Oceana Gold Limited (OGL) to SRMR-I10 which are discussed in paragraphs 7.1 to 7.3 of Ms Hunter’s evidence-in-chief.

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<sup>1</sup> <https://www.orc.govt.nz/media/13760/minute-5-directions-issued-orally-by-the-panel-during-hearing-week-one.pdf>

## SRMR-I10

- 5 Ms Hunter considers that further amendments should be made to SRMR-I10 to recognise that economic activities like mining are important to the region. At the hearing on 7 February 2023 she provided her suggested amendments to SRMR-I10. She also acknowledged the potential for a new issue statement to recognise the issues raised in regard to regionally significant industries such as mining.
- 6 On 10 February 2023, the Hearing Panel in its Minute 6 invited caucusing on the significant resource management issues for the region and particularly on the requests by a number of submitters, including OceanaGold, for new issue statement(s) and/or amendments in respect of regionally significant industries, activities, and/or infrastructure.
- 7 The Panel invited a response by the relevant s42A report writers or counsel for ORC once a co-ordinated response has been prepared following caucusing.
- 8 At this stage, I continue to support my section 42A recommendations in relation to SRMR-I10, however I anticipate providing additional evidence on any co-ordinated response to the broader issue outlined by the Panel that arises from caucusing.



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Jacqueline Ann Todd

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24 February 2023