

SUBMISSION ON APPLICATION CONCERNING RESOURCE CONSENT

Under the Resource Management Act 1991

TO: OTAGO REGIONAL COUNCIL; WAITAKI DISTRICT COUNCIL; DUNEDIN CITY COUNCIL

SUBMITTER: KĀTI HUIRAPA RŪNAKA KI PUKETERAKI, TE RŪNAGA O MOERAKI, AND TE RŪNAKA O ŌTĀKOU

1. This is a submission on an application from OceanaGold (New Zealand) Ltd (**OGL**) for a range of resource consents to enable the construction, operation, and activities comprising the Macraes Phase Four Project (**MP4**) (the **Application**).
2. The Application is set out in the Assessment of Environmental Effects submitted to the Councils.
3. This submission is made by:
 - (a) Kāti Huirapa Rūnaka ki Puketeraki;
 - (b) Te Rūnanga o Moeraki; and
 - (c) Te Rūnaka o Ōtākou.
4. This submission refers to Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, and Te Rūnaka o Ōtākou as "**Kā Rūnaka**".
5. Kāti Huirapa Rūnaka ki Puketeraki are recognised as mana whenua in the Application area. Te Rūnaka o Moeraki and Te Rūnaka o Ōtākou are also affected by the Application.
6. Kā Rūnaka is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.
7. Kā Rūnaka is directly affected by elements and effects of the Application that:
 - (a) adversely affects the environment; and
 - (b) adversely affects cultural values.
8. Kā Rūnaka considers that the assessment of effects in the Assessment of Environmental Effects (**AEE**) provided by the applicant does not adequately address the magnitude, severity, and ongoing impact of the effects arising from the Application.
9. Furthermore, the conclusions contained in the Application regarding the effects arising from the Application have been reached without an assessment of the cultural impacts of the project endorsed by Kā Rūnaka. It is not possible for the Applicant to conclude that the effects are of an acceptable level without cultural input into their assessment. Therefore, the basis for the AEE is flawed and the conclusions reached under that framework are similarly flawed.

10. The specific parts of the Application that Kā Rūnaka's submission relates to are:
 - (a) Effects on water quality arising from the Application, including cumulative effects;
 - (b) Provision for appropriate and meaningful management of long term environmental effects;
 - (c) Uncertainty of ongoing and long term nature of effects;
 - (d) Impacts on biodiversity;
 - (e) Impacts on landscape values;
 - (f) Visual amenity effects, including perceived effects;
 - (g) Cultural effects;
 - (h) Land restoration requirements and certainty;
 - (i) Economic effects on Kā Rūnaka;
 - (j) Durability and sustainability of proposed offsets and mitigation; and
 - (k) Inadequate mitigation of all above effects.
11. Significant impacts on mana whenua values for wai Māori, whenua, taoka species, and wāhi tipuna have arisen from the existing mining and associated activities. These impacts are a source of mamae for Kā Rūnaka. The Application and associated expansion of activities will result in even greater, broader, and further effects on mana whenua values, particularly in relation to wai Māori, whenua, taoka species, and wāhi tipuna.
12. The ORC Notification Recommendation Report (20 March 2025) contains detailed assessments of potential adverse environmental effects. The Report also recognises (Chapter 9.12) that the relationship of Kai Tahu Runaka with the catchments affected by adverse effects is a matter of national importance that must be recognised and provided for in the management of natural and physical resources. The ORC Report also notes (chapter 9.12) that "the mining activities proposed set in train adverse effects that may endure for many generations to come".
13. In the absence of:
 - (a) Further detailed information on the matters outlined in paragraph [10]; and
 - (b) A credible long term environmental management plan backed by appropriate consent conditions and relevant long term environmental safeguards

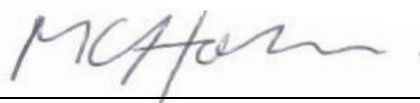
Kā Rūnaka has little choice but to oppose the consents sought.

14. In addition to the above, Kā Rūnaka:

- (a) says that the Application will not enable, nor will it support, their whānau, their whenua, their waimāori, their waitai, their tamariki, their mokopuna, and all future generations, to flourish;
- (b) has concern regarding past record of OGL in relation to compliance with conditions and operating requirements, particularly in the context of the significant levels of effects and the long timeframe of effects arising in relation to the Application. A particular concern is who will assume technical management and financial responsibility for long term environmental restoration and management (including compliance obligations) once mining operations cease. From a cultural and environmental impact viewpoint, it will be crucial that comprehensive provision is made in any conditions of consent for post-mining environmental protection and management, including recognition and action with respect to any related cultural matters;
- (c) considers that the representations made in the AEE regarding ongoing consultation and involvement lack relevant context. The Applicant has progressively consented the expansion of the Macraes Gold Project and updated the current Application. Kā Rūnaka was provided the updated Application and technical information for MP4 Stage 3 in March 2025. The incremental consenting of MP4 and revision of the technical information for the current Application has hindered the ability of Kā Rūnaka to holistically assess the cumulative impacts of this complex Project. This does not fulfil the parameters of appropriate consultation, nor recognise the role of iwi as kaitiaki with strong connections to the whenua in which this mine is operating and seeks to expand; and
- (d) does not consider that the Application appropriately deals with climate change, and potential implications arising.

15. Kā Rūnaka wish to be heard in the hearing in support of this submission.

DATE: 1 May 2025



**Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnaga o
Moeraki, and Te Rūnaka o Ōtākou**

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