

IN THE MATTER of the Fast-track Approvals Act 2024 (the Act)

AND

IN THE MATTER of an application made under the Fast-track
Approvals Act 2024 by Matakanui Gold
Limited (Santana Minerals)

CONDITIONS PROVIDED ON BEHALF OF KĀTI HUIRAPA RŪNAKA KI
PUKETERAKI, TE RŪNANGA O MOERAKI, TE RŪNAKA O ŌTĀKOU, AND
HOKONUI RŪNANGA (KĀ RŪNAKA)

21 August 2026



HOLM | MAJUREY

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TĒNĀ, E TE ROOPU TOHUNGA

1. Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki, Te Rūnaka o Ōtākou, and Hokonui Rūnanga (**Kā Rūnaka**) provide the attached suggested conditions which address some aspects of iwi involvement. The attached suggested conditions do not ameliorate the ongoing unmitigated adverse cultural and environmental effects.
2. As was clearly set out in the evidence of Dr Alayna Rā¹, Matt Dale², Jade Watkin³, and Mr Edward Ellison,⁴ there are inevitable adverse effects incapable of avoidance or mitigation by conditions. This fact was similarly recognised by the Panel in RFI11, where they commented "For example, the landscape and ecology evidence demonstrates ongoing unmitigated adverse cultural impacts (e.g. paragraph 31 of the landscape JWS and paragraph 46 of the lizards JWS)".
3. The attached suggested conditions are provided solely on the purely pragmatic basis that should consent be granted, any conditions that recognise an appropriate role for Kā Rūnaka in addressing cultural and environmental effects would be better than the current lack of such conditions.
4. With or without the attached conditions, the final version of the conditions fails to adequately address adverse cultural and environmental effects, and remains inconsistent with fundamental Treaty settlement obligations.
5. Furthermore, these conditions have been prepared without adequate time to consider the substantial information provided by the Applicant in response to RFI-11. The author was also subject to time constraints associated with the consent workshops which have been running concurrently with the requirement to produce these conditions. This context has resulted in these conditions being provided as a basis to

¹ Evidence of Dr Alayna Rā (10 April 2026) at [32], [33], [34].

² Evidence of Matt Dale (10 April 2026) at [90], [93].

³ Evidence of Jade Watkin (10 April 2026) at [44] - [48].

⁴ Evidence of Edward Ellison (10 April 2026) at [110]-[113].

progress on what was previously proposed by the Applicant,
and not as a final and fully informed set of conditions.

DATE: 21 August 2026

The image shows two handwritten signatures in blue ink. The first signature, on the left, is 'Mike Holm' and the second, on the right, is 'Nicole Buxeda'. They are written on a light blue background.

Mike Holm / Nicole Buxeda

Counsel for Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Moeraki,
Te Rūnaka o Ōtākou, and Hokonui Rūnanga