Your Comment on the Waihi North draft conditions

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email to Substantive@fasttrack.govt.nz.

(a) Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Coromandel Watchdog of Hauraki		
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Email (a valid email address enables us to communicate efficiently with you)	info@watchdog.org.nz NB your system seems to struggle with that address so if required please use: watchdogcoordinator@gmail.com		

Please find our comments below.

BEFORE THE FAST-TRACK APPROVALS PANEL

In the matter of the Fast-Track Approvals Act 2024

And

In the Matter of Conditions set on the Applications by Oceana Gold (New Zealand) Limited for various resource consents and other authorities relating to the Waihi North Project (including the Wharekirauponga Underground Mine)

And

In the matter of the submission on the above Conditions

Comment on CONDITIONS

Coromandel Watchdog of Hauraki Inc

Dated: 4 December 2025

Submission on Conditions to Fast-track Application No. FTAA-2504-1046 – Waihi North Project

1. We are the Coromandel Watchdog of Hauraki Inc.

2. We remain opposed to the application by Oceana Gold (New Zealand) Limited (Applicant) under the Fast-track Approvals Act 2024 (Act) to expand its existing gold and silver mining operations, both above and below ground, at sites in the Waihi area of the Coromandel Peninsula, and to establish a new mine in public conservation land to the North of Waihi, being Fast-track Application No. FTAA-2504-1046 (the Waihi North Project Application).

3. While our preference remains that the Application is declined in full, as the draft decision is to grant the application, we want to acknowledge that the Panel has provided us with an opportunity to comment on the conditions while noting that no conditions will ever justify the approval being given for a company to create a literal mountain of toxic waste; it will never be justified to risk the habitat and health of threatened species of flora and/or fauna; it will never be justified to risk life sustaining fresh water resources.

4. We are disappointed that the draft decision to approve this application does not appear to have meaningfully considered many of our points relating to the potential to decline the parts of this application that apply to a new mine in public conservation land (Wharekirauponga Underground Mine), despite this being distinct from an expansion of existing operations, as the application describes itself.

5. These Conditions permit an inherently destructive activity; the conditions themselves underscore the scale of the environmental and financial risks being imposed. We view these conditions as inadequate or risky attempts to mitigate inevitable environmental damage. Part E: (Evaluation of Effects) findings confirm that the mine will have permanent, high-impact effects and place extremely high risks on our environment, threatening the water and wildlife we cherish, while relying on uncertain mitigation measures to manage a long-term liability. We remain opposed to the mine's proceeding.

Introduction

6. The Coromandel Watchdog is a person [organisation] invited to provide comment on the draft conditions proposed for the the Waihi North Project Application pursuant to Section 70, as a previously invited Section 53 invitee, in accordance with Minute 7 paragraph [2].

7. These submissions are required by the Expert Panel to be received by the Environment Protection Agency on behalf of the Expert Panel by 4 December 2025 by paragraph 2 of Minute 7.

8. We note the participation of persons listed in paragraph [1](h) of Minute 1 as warranting invitation to comment (including Coromandel Watchdog of Hauraki) were invited on the basis of, amongst other factors specified in paragraph [4] of Minute 1, the likelihood that “their participation will facilitate a critical testing of the bases on which the proposal is advanced”.

9. The submissions that followed, and the accompanying expert evidence were provided to the Expert Panel on the basis that these submissions

and reports together provide an independent, locally experienced and critical testing of key parameters and assumptions of the Waihi North Project Application. Our comments now on these conditions are made under the same basis.

10. Coromandel Watchdog of Hauraki is a community group that first incorporated as a society in 1979, as a direct response to community concerns about the [then] renewed mining interest in the region. We have remained a leading environmental group in the area, today we have more than 5000 supporters and have been involved in a range of local and national planning developments.

11. We recognise that Te Tiriti o Waitangi is the basis for relationships between the Crown and tangata whenua but also give us responsibility to recognize the rangatiratanga of tangata whenua in the Hauraki rohe. The authority, and concerns of the tangata whenua regarding mining, beyond consultation and engagement, should be the central decision-making focus.

Comments:

12. We note the complexity of the suite of Conditions and the volume of material to review in the timeframes given and the limits to our capacity to undertake in-depth evaluation in the timeframe available.

13. As in our initial comment, it is our submission that the Wharekirauponga Underground Mine (WUG) should not have been included in this application; the WUG, and TSF3 that would be required to store the waste it produces are a distinct project, with very different impacts and effects

on an environment that is definitively separate from the rest of the project. Furthermore, we note that the actual mining activity is not proposed to commence for another 8 years. We are disappointed to see that the Panel has continued to consider these two distinct activities together.

14. It is difficult to comment meaningfully on all of the Conditions for such an incredibly complex proposal, when it seems that they are contingent with, and reference, some 20 Management Plans (for example the WUG Ecology and Landscape Management Plan) which appear as yet unavailable. The sheer number of Plans highlights the complexity and high level of risk involved in this activity. The effectiveness of management of this proposal relies entirely on the quality of these Plans (and associated Conditions) and the certification and rigour of enforcement by the Councils, who we note have well documented and increasingly limited capacity.

15. While we understand that it is accepted that Management Plans are often not part of the application, and that the application is not assessed based on the Management Plans, large complex projects and accompanying conditions are much harder to assess in a meaningful and holistic way without these more detailed Plans. As the Panel will be well aware, there is no provision for public input - or indeed even input from Section 53 parties to the application, in the development and assessment of these Plans.

16. Our submissions relate to the content and structure of the Conditions, or the interrelation of various Conditions. There appears inconsistency between some of the conditions, and many of the conditions have loose wording like ‘will engage with’ (undefined), ‘will use best endeavours’

(weakly enforceable at best), to the extent practicable etcetera…wherever possible these should be pruned and replaced with a clear, enforceable parameter or limit.

Capacity

17. The Conditions present as a very tangled web; those levels of interoperability, in our experience, are unusual - especially with small and very under-resourced district councils which raises a key concern regarding agency capability and collaboration to even manage the maze of conditions and overlapping responsibilities.

18. In light of this complexity, we question if there is a basis from which the various agencies are going to work together (especially with some overlapping conditions equally enforceable by both). The management of the significant number of Management and Monitoring Plans alone will be a full time role for the regulators, inclusive of managing the various due dates, amendment processes let alone the actions within them.

19. We note that there is an appointed company liaison person for the project, which is positive, but we have serious reservations about capacity. Many of the conditions are highly technical. Where there is absent expertise within council or retained by council, compliance may (by default) be assumed or not sufficiently interrogated. This presents a serious risk.

20. A similar concern exists for expert oversight of technical activities such as relocation of threatened plant species (which seems to be assumed – see C149). Where expertise is not available great harm can occur. Both these issues need addressing. Another and deeply concerning instance of this is

– “If four or less ‘At Risk’ or ‘Threatened’ frogs are found during any ecological survey(s), the Consent Holder will must mark and record each location with biodegradable flagging tape and GPS to give an error of no more than ± 2.0 m.” while another one says the threshold to relocate a rig site is five of these terribly endangered species. This creates an unacceptable discretion in the operational space by the Consent Holder.

21. The Peer Review Panel as a concept is sound, but we find it curious that the Consent Holder is charged with engaging the ‘fully independent’ persons that have sufficiently demonstrated a suite of experience collectively. A more robust approach might be that one of the councils (perhaps WRC) establishes that, at the consent holder’s cost, and provides a secretariat function to reduce risk of undue influence.

22. The monitoring of the project is oblique; several conditions refer to the need for the consent holder to explain why things haven’t been achieved when they should have been and coming up with alternatives in-house, often with long delays (e.g. four planting seasons as per conditions relating to planting), where we would expect that that is likely a compliance issue, and a failure to meet the targets in Plans, or for things to be planned and changed, without regulator oversight is a breach and should be framed as such. This threshold variation potentially undermines enforceability.

23. It must be for the regulator to decide what action to take; parameters must be clear to enable that or there is a risk of regulatory capture, or at least the perception of one, creating a low trust environment and potentially leading to negative effects. A similar consent holderas-self-regulator approach is taken to dewatering outcomes.

24. The discretion of the regulator must be made explicit and the Conditions take care not to legitimise failures to meet conditions (Condition G27 provides a better example of how to navigate such shifts).

Management Plans and Amendments

25. The proposed Conditions allow for variation in the future. The ability to amend the various Plans are proposed to be a negotiation between the Consent Holder and the relevant consenting authority only. It is our submission that Councils should be able to, and in fact should be compelled to, initiate consultation with iwi, hapu and/or the wider publis where any aspect of these Conditions are proposed to be amended.

26. We accept that there may be minor variations which might not warrant consultation but there may be significant variations applied for, which a Council must be required to negotiate with hapū and iwi and the other parties who were invited to comment on the Waihi North consents, as a part of the critical testing and information gathering they require to enable them to make a robust decision. Amendments toare not slated in this Act to be Fast-tracked, only the application itself.

27. One example that highlights this is how the (Proposed Combined Conditions (Waikato Regional Council and Hauraki District Council) Rehabilitation Bond can be varied, cancelled or removed at any time by agreement between the Consent Holder and Councils providing the parties agree and Councils are satisfied. This is an unacceptable approach to varying (amending) something as significant as the Rehabilitation Bonds and at the minimum it is our submission that Parties included

under the Section 53 should be included in decisions in relation to such changes in Conditions.

28. It must be clear that any amendments must be certified by the Council(s), and that the Council may decline amendments as they see fit. While this is implied currently, it must be explicit.

29. Further to this there is a reliance on publicly funded arbitration, which creates an unfortunate imbalance of power where the applicant may well have resources to dispute for example, the quantum of the bond (or the sufficiency of insurance cover or what have you), where the Councils or other Consent Authority may not; the requirement to pay Councils costs is excluded from the consent holders obligations and while we understand that this is not technically inappropriate procedurally, we have concerns about the resources that may be in reserve at the Councils to take these arguments and we ask the Panel to note that that risk is very real, and to consider that in setting that Condition.

30. Some Conditions refer to Management Plans that have as yet not been developed; we urge the Panel (and Councils) to take care with conditions that require the development of a Plan that then work must proceed in accordance with, where work may start before that Plan is developed.

31. An example is the Cultural Practices Plan from the Advisory Group (see C18A). These can be lengthy processes, what happens in the meantime? Similarly, for all other Management and Monitoring Plans; if nothing constrains work prior to their availability, the Conditions will not be adequate in and of themselves, indeed, they rely on the development of the plan, so there is nothing to measure them against in that time.

32. While we understand and respect that the Thames Coromandel District Council has indicated that they do not want responsibility for certifying minerals related activity due to a lack of in-house expertise, we are concerned at this abdication of responsibility, and the reasoning, and we do not see the transfer of that certification to HDC and WRC as an appropriate solution; the Panel can and should direct the Applicant to provide appropriate resourcing to enable to Council to be able to provide the expertise required.

33. It is unclear in the rationale why the Department of Conservation are only able to comment on amendments to these Plans. If this restriction is to remain, then the amendments must "give effect" to their comment.

34. Management Plans give Councils some power without detailing it all in consent conditions, but if the requirement is only to submit (without the need for council to approve), the council is left powerless - bypassing the point of the plans and conditions.

35. Should the Panel decide to accept the TCDC abdication of responsibility (in the face of the increased costs and expertise) in this space, the requirement regarding their comment must be to "*give effect to*" as opposed to "consider".

Mitigation Hierarchy

36. The consent Conditions collectively license environmental destruction, contamination, and perpetual liability by substituting the generally accepted Effects Management Hierarchy, the internationally accepted approach to managing biodiversity, where the first step should be

avoidance, with a fragile and overly complex framework of reactive mitigation, mandated offsets, and an ambiguous financial arrangement.

37. It is our submission that the order of the Hierarchy is specific and critical; *avoidance* is, and must be, the first step. *Minimising* the impacts of development comes second, followed by *remediation* of any further harm. *Offsetting* is to be considered only if the prior three steps have been applied and are unable to be met, and are not sufficient to prevent biodiversity losses.

38. These Conditions establish regulatory thresholds and Management Plans that permit acceptable levels of environmental harm rather than preserving the natural state contrary to the intent of the Mitigation Hierarchy.

39. There is an apparent reliance on reactive monitoring throughout the Conditions. An example is the Dewatering and Settlement Monitoring Plan (DSMMP). This is required because the mining is expected to dewater the area. The objective is focused on preventing damage to infrastructure and authorized water takes, not on protecting non-authorized, natural state water bodies and wetlands. The WRC conditions then set specific, allowable Contaminant Limits (including for Cyanide and other heavy metals) in discharges, which effectively sanctions specific quantities of pollution.

40. There has not been enough weight, or consideration, given to the pre and post mine creation and treatment of toxic material and waste; for example, the WRC conditions allow the processing plant to emit over 131 kilograms of mercury per year.

41. The requirement to establish a Rehabilitation and Closure Plan confirms the long-term Acid and Metalliferous Drainage (AMD) risk, which must be managed in perpetuity, and yet there is still no provision made for a Cyanide Management Plan in any conditions, as per the evidence we provided from Dr Steve Emerman, nor any consideration specifically for the mobilisation of Mercury, Arsenic and Antimony.

42. It is our submission that these Conditions should explicitly require the Applicant to formally sign up to International Cyanide Management Code, and any other such international accreditation schemes that would enable, support and or provide independent and expert frameworks, and auditing programs, to ensure that mineral extraction activity in Aotearoa New Zealand is in line with International Best Parctice, and that the risk of regulatory capture in compliance mechanisms is reduced.

43. Compelling the Applicant to be a signatory, to have the commitments to these Internationally accredited and accepted 'best practice' mechanisms would also support local regulators, and community confidence in their work.

44. We are deeply concerned that the Panel appears not to have taken Mr Emerman's concerns into account given that he is a highly qualified expert in this area. Concerns around the movements of heavy metals must be considered, and the Mitigation Hierarchy employed in these considerations and subsequent Conditions.

45. There appears no Condition relating to the need to consider and be prepared to *avoid, remedy* or *mitigate* the potential unplanned release of these chemicals, which is a documented risk in this proposed activity.

46. Further, consideration for the actual impact of a potential spill is inadequately modelled, in the case of a tailings dam, and not modelled at all, in the case of metal mobilisation throughout the project mentioned above, meaning that not only has the hierarchy not been applied and Conditions set on these factors.

47. We do not believe that there are any options other than avoidance for 'managing the risks' of this material, which does not appear to have been considered in any of the Conditions that actually do address some of the toxics issues within the Application.

48. As with other areas of the Conditions, there is an acceptance of risk, rather than an avoidance of it; for example, the approval to store large volumes of hazardous substances (e.g., 40,000L of Diesel) is an acceptance of risk. The required secondary containment only mitigates a spill; it does not prevent the fundamental risk of an accident in a sensitive environment.

49. We understand that the Fast-track Approvals Act 2024 does not explicitly require the Mitigation hierarchy to be applied in the development of Conditions, and nor does it require a precautionary principle to be applied; however, as the former is the internationally recognised best practice, and the latter has been increasingly applied in the context of resource management in Aotearoa New Zealand, we do not accept that

the absence of explicit requirements to apply these is appropriate in decision making in such significant circumstances.

50. We submit that the large-scale "enhancement" Conditions are an explicit, although quiet, acceptance of irreversible damage, paid for through specific offset projects, again, an apparent departure from internationally accepted best practice.

Ecology

51. While we commend the Panel for not approving the killing of the frog species, this is somewhat offset by the recently amended Wildlife Act provisions where permission to take and kill 'absolutely protected' wildlife is granted where it is deemed unavoidable. The irony is that it is avoidable – wildlife are at risk only if this application gets approved.

52. It is our submission that salvage translocations generally fail and any long-term monitoring learnings will be negated by frequent habitat disturbance by the intensive monitoring (we see this with Powelliphanta snails – searching the plots too frequently destroys their microhabitat, making it less suitable for them).

53. We maintain that ultimately, no mitigation measures or conditions matter when approval is granted to take or kill protected wildlife anyway. However, given that there is a clear intent to approve this application regardless of all of those risks and considerations, the Conditions relating to the must also take into account the contiguous threat of groundwater dewatering and blasting vibration is not accounted for in the setting of the 3-metre to 6-metre buffer as set out as a requirement in the HDC conditions for these critically endangered species.

54. We were also horrified to see explicit approval being given in these Conditions for the incidental killing of numerous avian species that are variously listed within the threat classification scale. Similarly relating to threatened flora species; loss of any threatened species is unacceptable as a condition of this application.

55. The Combined Conditions mandate a dedicated Biodiversity Project. This is a clear mechanism to pay for the unavoidable ecological loss in the public conservation land within the target area, rather than avoiding the loss in the first place. This condition confirms that the activities proposed will cause unavoidable, permanent ecological damage requiring a compensatory intervention elsewhere. No amount of pest control in a separate area can replace the biodiversity lost at the specific mine site, and this proposal is merely a 'price' put on environmental destruction.

56. The TCDC conditions make reference to siting portable drilling rigs within this area, currently slated as 'no more than two' however, it is not explicit in the conditions that these rigs are to be for the installation of piezometers only. This must be made absolutely clear, particularly as the TCDC has abrogated/delegated their responsibility in these Conditions.

57. Further, the provisions for vegetation clearance of this area are overly vague, and could potentially result in significant clearance occurring, given the threshold is currently proposed that An example of this is in the TCDC Conditions "The Consent Holder must not fell any trees with a 50 cm or greater diameter at breast height at drill sites. Trimming of branches is permitted if the vegetation is likely to impair the function of frog fencing

or is causing a safety risk to staff and contractors". A 50cm diameter is significant and this Condition is woefully inadequate.

58. Where a Covenant be required to be placed on land as a Condition of the Consents, we submit thatin the first instance iwi and hapu be consulted, and that that consultation be *'given effect to';* where a Covenant is agreed, the conditions should specify a Queen Elizabeth 2 Covenant, as the most efficacious of the available covenants.

59. The conditions rely on environmental offsets, such as restoration planting, habitat enhancement, and pest control. These are compensation for the certain, irreversible loss of high-value natural state environments, the last resort in the mitigation hierarchy. The requirement for monitoring to continue for at least 20 years to meet biodiversity goals shows the long-term, uncertain nature of this as "mitigation."

60. The WRC conditions permit the loss of stream habitat in exchange for the creation of new stream channels and riparian planting. Similarly, the HDC conditions use pest control as a compensatory measure. Success of these programs is only to be determined after long-term monitoring (up to 20 years), meaning the benefits are uncertain and delayed. The Condition is inadequate.

61. These types of offsets are generally accepted in best practice to be a last resort in the Effects Mitigation Hierarchy, where in this application and draft consent conditions they have been proposed in the first instance.

Consultation:

62. The Iwi Advisory Group (IAG) is established to provide "input" into management plans (including the Mātauranga Māori Monitoring Programme), however the consent holder is only required to "consider" and respond to recommendations, meaning the process functions as a consultative body, not a decision-making authority. This is inappropriate and a breach of Te Tiriti o Waitangi. The requirement here must be to "*give effect*" to recommendations from the IAG.

63. We also note the minimal input from the Martha Trust, the organisation that will be charged with the responsibility for the toxic residue from mining activity in Waihi in perpetuity.

64. We note Management Plans and Compliance Monitoring Reports must be made available immediately after acceptance by council. It is unclear if the 'Compliance Monitoring' reports are all the reports pertaining to the numerous Monitoring Plans provided for, or just the annual one. Further to seeking this clarification, we submit that there is real merit in ensuring that it is all of them. We submit that there also be a Condition added requiring the agencies to be similarly transparent in disclosing their monitoring data.

Financial Considerations

65. We note that the Panel has elected to only require bonds for rehabilitation and for the Area 1 activity under the Access Arrangement; in our submission, the purpose of bonds is to secure the performance of all relevant conditions; they should be able to be uplifted in advance and not exclusively tied to rehabilitation. Condition C70 does indicate that it

should be for the performance of all conditions, but greater clarity is required, we suggest potentially naming it clearly i.e. Performance Bond.

66. The setting of both a Rehabilitation Bond and a separate Capitalisation Bond (Trust Fund) acknowledges that the mining activity will result in a permanent, unquantifiable risk to the community and environment. The estimated bond sums, set annually, will be insufficient to cover a catastrophic failure.

67. We understand that the Panel will not relitigate the weaknesses in the Applicants expert economic evidence and the Panel acceptance of no cost benefit analysis and the applicants conflating local benefit (without including costs) with regional and national benefit, which is required under the Fast-track law. Suffice to say the 'Monte Carlo simulation' of an *80% probability of the rehabilitation bond not being exceeded should not be the basis of conditions related to tailings dam failure; Our expert, Dr. Steven Emerman presented compelling evidence on this, and even a simple search on the internet (Google) could demonstrate that tailings dam failure, over time, is considered by the industry itself to be inevitable and costs of clean up will be in the billions with a low level of success in terms of land and water rehabilitation.

68. The financial provisions fail to fully secure the public against potential long-term costs, while creating a cost burden for tangata whenua, communities and Councils, who are already struggling with the monitoring and compliance work they already must do; we do not have the confidence that these institutions have neither the capacity nor the expertise to comprehensively manage the monitoring and compliance

work that they would be expected to undertake to facilitate these conditions.

69. The HDC/WRC Combined Conditions require two bonds:

> Rehabilitation Bond (Operational Liability): Secures compliance and completion of final closure, including minimum insurance coverage of $17 million (Industrial Risk) and $7 million (Public Liability).

> Capitalisation Bond (Perpetual Liability): This is the more critical bond, fixed annually by the Councils, specifically covering residual risk such as structural instability, contamination, and long-term monitoring after the consent expires or is surrendered.

As our experts have stated, we believe the modeling used in the bond calculations is not the appropriate calculation to use, although it is very likely that any bond able to be secured is grossly insufficient relative to the potential perpetual liability of treating contaminated water, which would ultimately fall on the taxpayer and ratepayers (see Tui Mine) if the bond is exhausted, the Bonds as set in the Conditions are not adequate.

70. In Part E (Bonds) there is a statement that the Martha Trust is yet to amend its Deed regarding its extended role in relation to Waihi North or in fact agreed to the extended role and responsibilities over the Waihi North Project.

71. The Panel cannot sign off a Consent for this project when the body charged with ultimate responsibility for the perpetual maintenance of the toxic tailings dams post closure of the mines is yet to agree to it or have legal ability to do so. This is a serious situation which requires immediate attention and should not be a Condition until it is resolved..

Summary

72. In summary, we submit that our comments demonstrate that the conditions proposed for the Proposal would not ensure that the benefits from such a proposal would be outweighed by the risks and costs. Whilst we note that the Panel are all specialists, we wonder if there is sufficient expertise specifically in policy/consent implementation as that might have helped the cohesion of these Conditions.

73. We also note our disappointment that the fundamental concerns we raised in our initial submission, supported by expert evidence, do not appear to have been addressed.

74. We submit that the Panel should decline in whole (as a first preference), or in part (as a second preference), the Waihi North Project Application, despite the draft decision to grant the application, because:
    a) the Project's adverse impacts on the receiving environment, hydrology, impacts on highly vulnerable and nationally significant frog species and other threatened species of flora and fauna found in that environment substantially outweigh any regional or national benefits (even after consideration of the conditions); and
    b) the Waihi North Project's regional and national economic benefits are overstated and do not undertake orthodox cost benefit analysis, with the consequence that these assessments are flawed and there remains unacceptable financial risks to the community in perpetuity that are not adequately addressed or provided for.

75. In addition, the social impacts of the Proposal are significant and there is no meaningful consideration of these impacts in the conditions.

76. After more than 30 years of mining operations in Waihi by the Applicant, we can see that "the mine has not had a clear benefit for Waihi as a community" (Professor Glenn Banks).[1]

77. As a long-standing representative of the wider Hauraki community, we see no evidence given by the Applicant that the Project would change the situation for the betterment of our community nor on a regional or national basis.

78. The adverse impacts associated with this applications proposed activity are expected to significantly and irreparably worsen the situation, and these conditions do little or nothing to address that.

Actions Sought in Response –

We respectfully seek the following actions to be initiated by the Expert Panel:

1. That the Waihi North Project Application is declined on the basis that the adverse impacts of the Waihi North Project, as presently proposed, are sufficiently significant to be out of proportion to the resulting regional and national benefits that the Expert Panel has considered under Section 81(4) in accordance with the Expert Panel's discretion to decline under Section 85(3); and that the mitigation hierarchy has not been appropriately applied.

[1] Professor Glenn Banks' expert evidence in our initial submission.

Closing Comments

We submit that this suite of Conditions will not adequately address the concerns around the environmental, economic or social effects and impacts we had when we made our initial submission; you cannot Condition your way out of a bad decision, and granting this application, even with this complex suite of Conditions, would be just that, a bad decision.

We acknowledge the expertise of the Expert Panel and members of the Environment Protection Agency who are dedicated to receiving and considering the above submissions, and we ask you to consider very carefully the points that we raise relating to the perpetual considerations of the application, particularly relating to toxic material, and the responsibilities of decision makers in relation to threatened species.

We are available at any time to further discuss matters raised in this correspondence.

Nā mātou noa, nā
Coromandel Watchdog of Hauraki
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