

To: Paul Miles, GM Santana, 11 Sept 2025

Kia Ora Paul

Thanks for the invite to your proposed Community Liaison Group (CLG).

Sustainable Tarras welcomes the initiative to set up a liaison group to coordinate communication between the community and the mine company. We understand an initiative like this will likely become a requirement under eventual consent conditions. Getting the set up right from the outset is therefore critical.

Under the proposed Charter of Understanding you have attached however, we will not be able to participate. We see this charter as wholly inappropriate for a number of reasons listed below. In summary, we see the Santana proposal as a cynical attempt to subjugate and muzzle the local community towards a predetermined outcome. If the company is truly interested in "robust and open discussion with the community" (as quoted in a recent media article), then the charter would address the following concerns, and quite possibly others not yet mentioned here:

1. Under 2. Purpose. The final words "and project success" assumes a predetermined outcome that is not acceptable to us.
2. Under 3. Membership. "MGL retains full discretion on the selection of community members." This is not appropriate if this is to be a group truly representing the local community. There has to be equal say in who should have a seat at the table. As it stands several key members and/or groups of the local community that will be affected or are likely to be able to contribute significantly to the group have not received your letter. Mana whenua must also have representation on the group should they wish. Conflicts of interest must be surfaced from all members of the group.
3. Under 4. Roles and responsibilities. Chair and secretary of any liaison group should be independent from either company or community, and be independently appointed to the satisfaction of both Santana and the community.. Meeting minutes need circulation as drafts. Any participant has the right to propose agenda items. Audio recordings are to be kept as a record of actual discussions having taken place for dispute resolution. A dispute resolution paragraph in the Charter would also be helpful.
4. Under 5. Meetings. There need to be many more meetings in the initial phase to bring the community fully in the loop on all aspects of the proposed mine operation. These need to be scheduled far ahead of SM's application to the EPA to ensure that community concerns are taken on board, the project amended accordingly, consent conditions drafted and then tested on the community group with time for due consideration to be made and conditions to be redrafted. Meetings must be scheduled to meet the needs of all participants.

5. Under 6. Confidentiality and Ethics. Add. "At any time any participant has the right to disclose information shared, although all participants understand this may not always be in the best interest of the Purpose. Information disclosure therefore has to be carefully considered at any time." It has to be realized that information may become available from other channels than this group and this group's charter must not muzzle any of its participants from sharing information.

6. Under 7. Communication and reporting. We reject the inference that it is this group that will become the (preferred) method for updating the community, and possibly making decisions that affect the community. In its currently proposed Charter that is entirely inappropriate.

7. Under 10. This needs to include "fostering full information disclosure, collaboration,..."

In addition, Sustainable Tarras has repeatedly and for months now communicated a list of detailed questions about the mine project to Santana. Your refusal to answer those illustrates to us you are not particularly interested in initiating meaningful community dialogue. If and when this changes, please let us know.

Nga Mihi,

Rob van der Mark
Deputy Chair
Sustainable Tarras
Ph [REDACTED]