

# Submission to the Fast Track Approvals Panel

## **Bendigo-Ophir Gold Project**

Submitted by Bill Sanders on behalf of the Santana Mine Support Group

7 April 2026

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This submission is based on the group's survey posted to the Santana Mine Supporters Facebook group between 18 March and 3 April 2026. The survey received 860 responses, of which 852 consented to their responses being used in our submission. These responses have been analysed and summarised in this submission.

### Opening Statement

This submission is made on behalf of Santana Mine Supporters, an independent grassroots community group, not affiliated with Santana Minerals and receiving no funding, formed to ensure that the Expert Panel hears directly from local people and supporters who believe the proposed Bendigo-Ophir Gold Project should be assessed on its merits and on available evidence, rather than the volume or visibility of opposition.

The group was established after Bill Sanders and long-time Cromwell community members, observed a highly organised public campaign opposing the mine. This campaign has been running since 2024, and they considered that support for the project was not well represented in the public discussion. The group provides a platform for individuals who believe the project has the potential to deliver regional benefits, provided it is subject to appropriate scrutiny, conditions, and oversight.

The group respected the right of others to oppose the mine. Their concern was not that opposition existed, but that the public conversation had become increasingly one-sided, with community support for the project largely unseen or dismissed. They considered that local people who see potential benefits in the project, provided it is done well and subject to appropriate scrutiny and conditions, also deserve a voice.

That is why this group was created: to provide a place for ordinary people to express support, discuss the project openly, and restore balance to a debate that many felt had become dominated by a single narrative. The response has been significant.

Santana Mine Supporters Group has grown to more than 8,200 members in just nine weeks. This level of growth indicates that support for the project is substantial and should be considered alongside opposing views.

In our view, Santana has made a substantial and sustained effort to inform the public and provide opportunities for engagement. This has included repeated drop-in sessions in affected communities, direct opportunities to ask questions, newsletters, public updates, issue-specific explanatory material, contact channels for ongoing enquiries, and access to detailed technical documentation through the application process.

This submission is framed in the context of the Fast-track Approvals Act 2024. It addresses whether the adverse effects of the project are disproportionate to its regional and national benefits, and whether those effects can be appropriately managed through robust and enforceable conditions.

In our view, the evidence indicates that the project is consistent with the purpose of the Act, which is to enable projects that deliver significant benefits while ensuring that environmental effects are appropriately managed.

Our request to the Panel is straightforward: hear the expert evidence without bias, recognise that genuine community support exists alongside opposition, and determine this application on its merits.

## Executive Summary

This submission is based on responses to a survey conducted within the Santana Mine Supporters group between 18 March and 3 April 2026. A total of 860 responses were received, of which 852 consenting responses were analysed.

The results show a clear and consistent level of support for the project within the responding group, with 99.4% expressing support in some form, including 95.4% in full and 4.0% subject to conditions.

Support is grounded in an expectation that the project will deliver substantial economic and employment benefits. Over 99% of respondents assessed the likely economic and employment impact as positive. Respondents also identified broader benefits, including increased household incomes, economic diversification, and improved long-term resilience for Central Otago communities.

At the same time, supporters recognise that the project involves identifiable adverse effects, particularly in relation to groundwater, waste rock, tailings management, and long-term environmental stewardship. These risks are understood and should be addressed through clear conditions, ongoing monitoring, and enforceable obligations, including financial assurance mechanisms.

Support was not abstract or symbolic. Across the open-text responses, the dominant themes were jobs and employment opportunities, wider economic growth, greater work for local businesses and suppliers, and a stronger long-term future for the region through retaining or attracting people and skills.

Respondents also consistently emphasised the importance of appropriate safeguards. Recurring expectations included environmental protection, water and tailings management, rehabilitation and closure obligations, ongoing monitoring, compliance, and enforceable standards. A smaller number also referred to housing, accommodation, roading, traffic, schools, and other local services.

In this context, the project is considered to align with the purpose of the Fast-track Approvals Act 2024 by enabling a project of regional and national significance to proceed within a controlled and accountable framework.

## Introduction and Community Representation

This submission reflects the views of a large and growing group of individuals who live in, work in, or have long-standing ties to Central Otago, including business owners, workers, landowners, and others with a direct and ongoing interest in the future of the region.

The respondent group is broad and not limited to a single demographic. 627 respondents (73.6%) completed the survey as individuals, 129 (15.1%) as business owners or managers, 54 (6.3%) as workers or employees, and 30 (3.5%) as landowners, farmers or growers. Respondents also came from a wide range of sectors, including trades and construction, agriculture, mining and resources, hospitality, transport, and professional services.

There is also a strong regional connection within the dataset. 478 respondents (56.1%) indicated that they had lived or worked in the region for at least six years or for most of their life, with many others describing long-standing family, work, or business ties to Central Otago.

Notably, 269 respondents (31.6%) reported previous or current experience in the mining or resources sector, reinforcing that the views expressed are informed by a meaningful level of industry experience. This survey is not presented as a statistically representative sample of the wider public. Rather, it provides clear evidence of a large, organised, and engaged base of support within the Santana Mines Supporters Group.

The Panel has indicated that it is assessing whether the adverse effects of the project are disproportionate to its regional or national benefits.

This submission adopts that framework.

Supporters acknowledge that the project will have environmental and social effects that should be addressed. However, they consider that, with appropriate conditions and oversight, those effects can be managed to an acceptable level and are not disproportionate when weighed against the scale of the project's benefits.

## Regional and National Benefits

The Bendigo-Ophir Gold Project is expected to deliver significant economic benefits at both a regional and national level. This is supported by survey data, with 97.4% of respondents assessing the project's likely economic and employment impact as strongly positive.

Gold has been identified by the New Zealand Government as a critical mineral, reflecting its importance to economic resilience, financial systems, and global markets. The responsible development of domestic gold resources therefore aligns with national priorities, including export earnings and participation in global supply chains.

Based on available information, the project is estimated to generate more than \$2 billion in tax and royalty revenue over its life, with additional upside potential from further resource development. Independent economic analysis estimates annual GDP contributions of approximately \$360 million, with total economic impact of around \$5.8 billion over the life of the project.

More broadly, gold mining projects often evolve over time as exploration continues. In New Zealand, the Macraes gold mine has progressively extended its life through ongoing resource development, operating well beyond its original expectations. This demonstrates that, where geology supports it, additional resource discovery can expand both the scale and duration of economic benefits.

The project is expected to create approximately 350 direct jobs, with additional indirect and induced employment increasing total employment impacts to over 800 jobs. Average salaries are expected to be materially higher than current regional levels (\$140,000 P.A), contributing to increased household income, business activity, and demand for local services.

This is reflected in community feedback, where respondents noted the importance of creating stable, long-term employment opportunities in the region, which was the most frequently identified benefit, appearing in over 60% of open-text responses. Several highlighted that the area currently relies heavily on seasonal work, and that projects such as this could provide more consistent career pathways and support families remaining in the region.

Respondents identified limited local career opportunities as a factor contributing to outward migration, particularly among younger people. The project is therefore seen as supporting the retention and return of skilled workers, with 48.1% of respondents noting outward migration and 31.8% indicating that the project could help attract workers back or retain them locally.

Higher incomes are likely to support housing, retail, education, and professional services, contributing to broader regional development. In smaller communities, this has the potential to support population stability, school enrolments, and local services.

There is also a national benefit through the distribution of financial returns. A significant proportion of shareholders are New Zealand-based, meaning that a substantial share of the economic value generated by the project is retained within the domestic economy.

More broadly, experience from existing operations such as the Macraes gold mine demonstrates how mining activity can contribute materially to regional and national economies. Macraes contributes a significant share of economic output within the Waitaki district, accounting for over a quarter of local GDP, and supporting employment, contractors, and local businesses.

A consistent theme across both survey responses and regional strategy is the importance of economic diversification. Central Otago has benefited from tourism and viticulture, however both sectors are subject to external pressures, as seen during COVID-19 and through changing global alcohol consumption trends. The development of additional industries that generate higher-paying jobs is therefore seen as supporting long-term economic resilience.

This aligns with the Central Otago District Council's Economic Development Strategy, which identifies the need to improve productivity, diversify the economic base, and lift incomes. In this context, the project represents a significant opportunity to contribute to those objectives.

Recent RNZ reporting highlights that the New Zealand wine industry is currently facing oversupply, declining demand, and reduced profitability, with some growers reporting financial losses and reducing production. These conditions can have flow-on effects across regional economies, affecting employment, spending, and business activity.

Many in the community therefore see reliance on a narrow economic base as introducing risk. Survey responses reinforced this view, with respondents noting that the region's dependence on tourism and viticulture leaves it exposed to external pressures, and that additional industries are needed to support long-term economic resilience.

## Adverse Effects and Risk Management

Supporters recognise that the project involves identifiable adverse effects that require careful management. Survey responses reinforce this position, with environmental protection, water management, tailings storage, and long-term rehabilitation identified as key areas of concern. Of those who responded to the concern question, 16.2% referred to environmental, water, or tailings-related issues, while 17.7% indicated they had no concerns.

Respondents also emphasised the importance of monitoring, compliance, and enforceable standards, with 7.7% specifically identifying oversight and accountability as key expectations. These responses demonstrate that support is grounded not only in the perceived benefits of the project, but also in a clear expectation that it is developed responsibly and subject to appropriate safeguards.

In preparing this submission, Santana Mine Supporters has reviewed technical material submitted as part of the Fast-track application, including reports relating to water management, groundwater, tailings storage, geochemistry, environmental effects, and mine closure.

Based on that review, there is a level of confidence that the project has been designed with appropriate regard to environmental obligations, and that key risks are being identified and managed through established engineering, environmental, and regulatory frameworks.

This support is not based on an assumption that risks do not exist. Rather, it reflects an understanding that the application sets out a structured approach to managing those risks through design controls, monitoring systems, compliance limits, and long-term planning.

Supporters therefore consider that the project demonstrates a clear intent to meet its obligations and manage environmental effects in a responsible and accountable manner, subject to the Panel being satisfied on the expert evidence.

#### Groundwater

Groundwater protection is a key expectation. As outlined in the groundwater assessments (B.02–B.05), the project includes modelling of aquifer interactions and predicted drawdown effects. These indicate that effects are localised and can be managed through monitoring and mitigation measures, subject to enforcement.

The application identifies that seepage and mine-affected water will be managed through engineered systems, including interception, collection, and reuse, while clean surface water is diverted and separated.

The design reflects a controlled approach consistent with modern mining practice and New Zealand regulatory standards.

#### Tailings and Waste Rock

Some public commentary has characterised the proposed tailings storage facility as a large dam holding significant volumes of liquid. Based on the application material reviewed, this does not reflect the proposed design, which is not a conventional water-retaining dam, but a managed, largely solid landform with controlled water systems, monitoring, and regulatory oversight.

Tailings management and waste rock disposal are central issues in the assessment of the project. Supporters emphasise that the tailings storage facility must be designed, constructed, and operated to a high standard, with a focus on long-term stability and water quality protection.

The Tailings Management Plan (G.16) outlines design standards, operational controls, and performance requirements, including seepage management, water balance control, and defined inspection regimes.

The facility is intended to operate as an actively managed system throughout the life of the project, supported by continuous monitoring, clear governance, and independent review. It is designed to meet established engineering standards, including resilience to extreme weather and seismic events.

Cyanide used in processing is treated to internationally recognised standards prior to storage, ensuring that tailings are managed in a controlled and compliant manner.

Taken together, this indicates that the tailings storage facility is designed, operated, and monitored as a controlled system with multiple layers of oversight and accountability.

International evidence provides useful context for assessing risk. While tailings facility failures have occurred globally, their frequency has declined over time, reducing from approximately 50 events per decade in the 1960s–1980s to around 20 per decade over the past twenty years. More recent failures are increasingly concentrated in developing jurisdictions.

The primary causes of failure identified in global studies are extreme rainfall events and poor management practices, particularly where design standards and operational controls are inadequate. Failures are also more commonly associated with smaller or legacy facilities that do not reflect modern engineering approaches.

In contrast, mining operations in jurisdictions such as New Zealand are subject to strict environmental standards, independent technical assessment, and ongoing monitoring requirements. This reflects a regulatory and engineering framework designed to manage these risks to a high standard.

These findings indicate that tailings facility risk is closely linked to the quality of design, management, and oversight, rather than the existence of such facilities themselves. In this context, the application material for the Bendigo–Ophir Gold Project indicates that the proposed facility is intended to operate within a structured and regulated system consistent with modern practice.

#### Best use case for the land and Visual Effect

The suitability of the land for alternative uses is a relevant consideration, but not determinative. The key issue is whether the proposed use can be undertaken in a way

that appropriately manages environmental effects while delivering significant regional and national benefits.

The project is expected to have a limited visual impact due to its location and topography, with much of the site not readily visible from surrounding areas. Commitments to dark sky lighting principles further reduce potential effects on night-time amenity.

Taken together, these factors suggest that the project can be accommodated within the landscape with relatively limited visual impact.

Support for the project also acknowledges the conservation covenant identified under section 42(4)(g) of the Act. This covenant protects significant natural values, and respondents support the project on the basis that the fast-track process enables integrated land management, where mining activity can coexist with, and ultimately enhance, protected areas.

The proposed rehabilitation approach is viewed not as a risk to the covenant, but as a mechanism to support long-term outcomes, including sustained funding for weed and pest control and the ongoing management of conservation values beyond the life of the project.

Concerns regarding landscape effects are also informed by differing perspectives on land use. In this context, the views of immediate landowners are relevant. As reported in the Otago Daily Times (2026), Bendigo Station owner John Perriam, a long-standing custodian of the property and descendant of the area's original settlers, has publicly expressed support for the project.

Having managed the station since 1979 and integrated farming, vineyards, public access, and other land uses over time, his position reflects direct, on-the-ground experience of the landscape. Mr Perriam has described the project as consistent with the area's mining heritage and has expressed confidence in the regulatory process and modern mining practices.

He has also indicated an expectation that, following rehabilitation, the land could be returned for public use, including as a park, and that proceeds from the sale will contribute to community initiatives such as his plan to establish a medical services trust.

This perspective provides a relevant example of how those directly connected to the land consider the project in the context of long-term land use, community benefit, and regional development.

## Coexistence with Tourism and Other Land Uses

Public concerns have been raised regarding the compatibility of mining with tourism and other land uses. Evidence indicates that coexistence is possible where impacts are appropriately managed.

The experience of Waihi provides a relevant New Zealand example of mining operating alongside an established and functioning community. Mining in Waihi contributes significantly to the local economy, with estimates indicating approximately \$170 million in economic contribution in a single year, supporting several hundred direct and indirect jobs. Despite the presence of an open pit mine in close proximity to the township, Waihi continues to attract visitors, with the Martha open pit and associated mining heritage forming part of the local tourism offering. Population growth and community survey data indicating largely positive perceptions of mining further demonstrate that mining has not displaced community life or economic activity.

Survey responses further support this, with 303 respondents identifying positive community growth if the project proceeds, and 277 referring to stronger support for local schools, clubs, and services.

A closer and highly relevant regional example is the Macraes gold mine in Otago, New Zealand's largest gold mining operation. Macraes has operated for over three decades and produced more than five million ounces of gold, while coexisting with the development of Central Otago as a recognised premium wine region.

Macraes has contributed significantly to the regional economy through employment, contracting, and local business activity, and remains an established part of the Otago landscape. Its long operating history provides practical evidence that the risks associated with modern mining, including those relating to pit design, tailings management, and environmental effects, can be managed over extended periods within New Zealand's regulatory framework. It also reflects the depth of local engineering, operational, and regulatory expertise available to design, construct, and oversee mining infrastructure to a high standard.

While concerns were raised during earlier stages of its development, the operation has proceeded within New Zealand's regulatory framework, with monitoring, oversight, and evolving standards applied over time. This provides a practical example that environmental effects associated with modern mining can be managed over the long term.

International comparisons provide further context. The Cadia Valley Operations in New South Wales, a large-scale open-cut gold and copper mine, operates approximately 20 kilometres from the Orange wine region, a recognised premium wine region. Despite initial concerns regarding dust, water quality, and reputational effects, the wine industry

in Orange has continued to expand, with vineyard development and wine tourism growing alongside mining activity. At the same time, the Cadia operation has become a major contributor to regional employment and economic activity.

Similar patterns are evident in Western Australia, where the Boddington Gold Mine operates in a region that also supports agriculture, including orchards and vineyards. These examples demonstrate a consistent pattern across comparable jurisdictions: while open-cast mining proposals often attract opposition based on perceived risks to surrounding land uses, the available evidence indicates that mining and established industries can operate concurrently.

Impacts are not absent and require careful management. However, the distinction between perceived risk and demonstrated outcomes is important. Evidence from comparable jurisdictions supports a position of managed coexistence rather than irreversible disruption.

Internationally, former mining sites such as the Britannia Mine in Canada have transitioned into long-term tourism and heritage assets, demonstrating that, with appropriate planning and rehabilitation, mining can also contribute to future land uses beyond its operational life. This reinforces the broader point that mining does not preclude other economic uses over time, but can form part of a longer-term development pathway.

On that basis, while environmental effects must be appropriately managed, the weight of evidence indicates that the project can coexist with tourism and other land uses without undermining long-term regional outcomes.

## Regulatory Oversight and Enforcement

Support for the project is strongly linked to confidence in regulatory oversight.

New Zealand's regulatory framework has strengthened over time, such as after the Pike River disaster, leading to improved health and safety systems and greater accountability. However, its effectiveness depends on the quality of implementation, monitoring, and enforcement in practice.

It is essential that any approval includes:

- Clear and enforceable consent conditions
- Independent monitoring and reporting
- Transparent public disclosure of environmental performance
- Meaningful consequences for non-compliance

There is also strong support for a ring-fenced financial assurance mechanism. This could take the form of a progressively increasing bond over the life of the project,

designed to cover rehabilitation, long-term environmental management, and potential failure scenarios.

Such a mechanism would ensure that the costs of environmental management are not transferred to the public and would provide confidence that obligations will be met regardless of future changes in ownership or market conditions.

## Long-Term Legacy

The project should be considered not only in terms of its operational life, but also its long-term legacy.

With appropriate rehabilitation and planning, the site has the potential to support future land uses, including recreation, tourism, and heritage interpretation. Central Otago has a history of land use evolving over time, and this project could form part of that ongoing development.

Examples such as Arrowtown demonstrate how former mining areas can transition into long-term community and tourism assets, supporting local businesses and regional identity.

As the project develops, there is potential for the site to contribute to future tourism and community use, with opportunities to be identified and developed progressively over the life of the project.

## Conclusion

The Bendigo-Ophir Gold Project presents a significant opportunity for Central Otago and for New Zealand.

The evidence indicates that the project will deliver substantial regional and national benefits, including employment, economic growth, and increased resilience within the Central Otago economy. These benefits are well supported by both the application material and the views expressed in this submission.

The survey evidence presented demonstrates a strong and consistent base of community support. That support is grounded in a clear expectation that the project will create employment, support local businesses, strengthen regional resilience, and provide long-term opportunities for local communities.

At the same time, the project presents identifiable environmental and social risks. These risks are recognised by supporters and are not dismissed. Rather, support is contingent on those risks being appropriately managed through robust conditions, monitoring, and enforcement.

The key issue for the Panel is not whether effects exist, but whether they can be appropriately managed and whether they are proportionate to the benefits. Based on

the material reviewed, including the technical assessments provided as part of the application, the evidence supports the conclusion that they can be managed to an acceptable level.

This submission does not ask the Panel to overlook risk. It asks the Panel to assess the application on its merits, to weigh the technical evidence carefully, and to recognise that a substantial and informed body of community support exists for the project proceeding, provided that appropriate safeguards are imposed and enforced.

Based on the evidence available, we consider that the adverse effects of the project are not disproportionate to its regional and national benefits.

For these reasons, this submission supports approval of the Bendigo-Ophir Gold Project, subject to the imposition of robust, enforceable, and transparent conditions, as outlined in Appendix E.

This approach is consistent with the purpose of the Fast-track Approvals Act 2024 and provides a balanced outcome that enables development while maintaining appropriate environmental safeguards.

## Appendix A – Survey Methodology

This appendix outlines the methodology used to collect and analyse survey responses.

### **Survey scope and timing**

The survey was posted on the Santana Mine Supporters Facebook group page and remained open between 18 March 2026 and 3 April 2026. A total of 860 responses were received over this period.

### **Consent and inclusion criteria**

For the purposes of formal reporting and inclusion in this submission, only responses where the respondent selected “Yes, I consent” to the relevant consent question were included in the analysis. This resulted in 852 responses being included. Eight responses were excluded due to lack of consent.

### **Data analysis approach**

Closed-ended questions were analysed using raw counts and percentages of valid responses. Open-text responses were reviewed and coded into recurring themes. This approach enabled common patterns to be identified and described without relying on anecdotal examples or selectively quoting individual responses.

### **Data integrity and handling**

Responses were analysed as submitted. No weighting or adjustment was applied to the data. Where duplicate entries were identified, they were not considered material to the overall findings and did not affect the reported results. No names, emails, or personally identifiable information are published in this submission.

### **Interpretation of results**

The findings should be read as descriptive evidence of the views of participating respondents within the Santana Mine Supporters group.

The survey was conducted within a self-selected group of supporters and is therefore not intended to represent a statistically random or representative sample of the wider Central Otago population or all affected stakeholders.

However, the results provide clear evidence of the scale, consistency, and reasoning of support within this group, including both the perceived benefits of the project and the expectations respondents have regarding environmental management, regulation, and long-term outcomes.

## Appendix B – Survey Summary Results

The table below summarises key quantitative findings from the Santana Mine Supporters survey.

<b>Key finding</b>	<b>Count</b>	<b>Percent</b>
Total survey responses received	860	—
Responses analysed (consenting only)	852	100.0% of analysed responses
Support the project	813	95.4%
Support the project with conditions	34	4.0%
Supportive in total	847	99.4%
Economic/employment impact rated positive	850	99.8%
Lived/worked in region for 6+ years or most of life	478	56.1%
Direct mining/resources experience	269	31.6%

## Appendix C – Supporter Perspectives (Selected Survey Responses)

The following are some open-text responses provided by participants in the survey. They illustrate recurring themes identified in the analysis, including employment, economic impact, community outcomes, and expectations around responsible development.

### 1. Employment and Economic Opportunity

“Bringing sustainable jobs to the region. Creating new incentives and opportunities.”

“The project would bring consistent, well-paying jobs to the community and significant additional work for local contractors.”

“Employment for experienced operators and opportunities for new workers to train and stay local.”

“I support jobs for our community and money staying in New Zealand.”

“More jobs, more opportunities, and more economic activity for local businesses.”

“This project would create meaningful employment and help strengthen the regional economy.”

## **2. Regional Growth and Community Benefit**

“The mine would help grow the region and create opportunities for working-age people, with positive flow-on effects across the community.”

“I was born in Cromwell and know the area well. This proposal can only bring prosperity and employment opportunities for the district.”

“It’s a great opportunity for community growth, provided infrastructure grows alongside it.”

“The additional population and spending would support local businesses, services, and community facilities.”

“This would support schools, clubs, and services by strengthening the local economy.”

“It would bring life back into the community and support long-term development.”

## **3. Retaining and Attracting People**

“May entice workers back from overseas. Plenty from Otago and Southland could return for work here.”

“We need opportunities like this to keep young people in the region.”

“This would help retain skilled workers and bring families back home.”

“There are limited opportunities locally, and this project would change that.”

“It would allow people to build a future here rather than needing to leave.”

“A project like this helps create a more stable and sustainable community.”

## **4. Economic Diversification and Resilience**

“Central Otago needs more than just tourism. This would help diversify the economy.”

“We cannot rely on one or two industries forever. This adds balance.”

“This project strengthens economic resilience and reduces dependence on seasonal industries.”

“It’s important that New Zealand develops its own resources rather than relying on overseas supply.”

“This is an opportunity to build a more sustainable economic base for the region.”

“The long-term benefits to the region and the country are significant.”

## **5. Support with Safeguards and Responsible Development**

“Keen to see it go ahead. Just need confirmation that environmental concerns are addressed and properly managed.”

“I support it as long as proper safeguards and monitoring are in place.”

“Provided best practice is applied to environmental management, I fully support the project.”

“This should proceed if it is done properly, safely, and with strong oversight.”

“Environmental protection and accountability are important, but this project can be done responsibly.”

“I support the project with appropriate conditions and ongoing monitoring.”

## **6. Confidence in Modern Mining and Regulation**

“Modern mining practices and regulation give me confidence that this can be done safely.”

“With proper engineering and oversight, the risks can be managed effectively.”

“New Zealand has strong environmental standards, and this project should meet them.”

“I believe the systems in place will ensure the project is managed responsibly.”

“If done to modern standards, this project should not pose unacceptable risks.”

“There is strong regulation in New Zealand, and that provides confidence.”

## Appendix D – Reference Material

### D.1 Fast Track Application Materials – Bendigo-Ophir Gold Project

The following documents were reviewed by Santana Mine Supporters in preparing this submission and informed the views expressed regarding environmental management, engineering design, and economic impact.

#### Core Environmental Management and Monitoring

- Section 7 – Management and Monitoring of Actual and Potential Environmental Effects (A.14)  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0026/15569/A.14-Section-7-Management-and-Monitoring-of-Actual-and-Potential-Environmental-Effects.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0026/15569/A.14-Section-7-Management-and-Monitoring-of-Actual-and-Potential-Environmental-Effects.pdf)

#### Tailings and Mine Waste Management

- Tailings Management Plan (G.16)  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0014/15431/G.16-Tailings-Management-Plan.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/15431/G.16-Tailings-Management-Plan.pdf)
- Seepage Risk Assessment – Hydro-Geochem Group (K.05)  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0007/22201/K.05-Hydro-Geochem-Group-BOGP-MWSF-Seepage-Risk-Assessment-10-March-2026.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0007/22201/K.05-Hydro-Geochem-Group-BOGP-MWSF-Seepage-Risk-Assessment-10-March-2026.pdf)

#### Water, Groundwater and Compliance

- Recommended Water Quality Compliance Limits – Greg Ryder Consulting (B.07)  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0016/15550/B.07-Greg-Ryder-Consulting-Recommended-Water-Quality-Compliance-Limits-for-the-Bendigo-Ophir-Gold-Project-Ryder-2025\\_Redacted.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0016/15550/B.07-Greg-Ryder-Consulting-Recommended-Water-Quality-Compliance-Limits-for-the-Bendigo-Ophir-Gold-Project-Ryder-2025_Redacted.pdf)
- Groundwater Bore Take Effects Assessment – Kōmanawa Solutions (B.02)
- Groundwater Existing Environment and Effects Assessment – Kōmanawa (B.03)
- Surface Water and Catchment Effects Assessment – Kōmanawa (B.04)
- Groundwater Modelling Analysis – Kōmanawa (B.05)
- Mine Impacted Water Overview – Mine Waste Management Ltd (B.06)

#### Mine Closure and Rehabilitation

- Mine Closure Management Plan (B.40)  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0014/15512/B.40-Mine-Closure-Management-Mine-Closure-Plan-MCM-2025.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/15512/B.40-Mine-Closure-Management-Mine-Closure-Plan-MCM-2025.pdf)

- Applied Research Plan for Conservation and Rehabilitation – Landcare Research (B.16)

### **Ecology and Environmental Assessments**

- Assessment of Ecological Effects – Alliance Ecology (B.08)
- Aquatic Habitat Effects Assessment – Waterways Consulting (B.17)
- Vegetation, Wetland, Avifauna, Lizard and Bat Assessments (B.10–B.15)

(Available via the Fast Track application portal)

### **Economic Assessment**

- Economic Impacts of the Bendigo-Ophir Gold Project – Benje Patterson (B.01)  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0017/15551/B.01-Benje-Patterson-People-and-Places-Economic-Impacts-of-the-Bendigo-Ophir-Gold-Project-Benje-Patterson-2025.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/15551/B.01-Benje-Patterson-People-and-Places-Economic-Impacts-of-the-Bendigo-Ophir-Gold-Project-Benje-Patterson-2025.pdf)

### **Additional Technical Reports**

- Technical Report  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0018/15552/8dc988f7c7a17b0adbf44e9c16839e92f8999660.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0018/15552/8dc988f7c7a17b0adbf44e9c16839e92f8999660.pdf)
- Technical Report  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0026/15596/5ce461b523f6cbba0e4836117f75cc374504d008.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0026/15596/5ce461b523f6cbba0e4836117f75cc374504d008.pdf)
- Technical Report  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0019/15553/771947e83ed1d590ae9e6c695145b9594c42f49e.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0019/15553/771947e83ed1d590ae9e6c695145b9594c42f49e.pdf)
- Technical Report  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0020/15554/82a15ee6a64d8c65939f20d67e185ac7132b9e2c.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0020/15554/82a15ee6a64d8c65939f20d67e185ac7132b9e2c.pdf)

### **D.2 Fast Track Project Portal**

- Bendigo-Ophir Gold Project – Substantive Application  
<https://www.fasttrack.govt.nz/projects/bendigoophir-gold-project/substantive-application>
- Bendigo-Ophir Gold Project – Project Overview  
<https://www.fasttrack.govt.nz/projects/bendigoophir-gold-project>

### **D.3 New Zealand Mining Case Studies and Precedents**

#### **Macraes Gold Mine (Otago)**

- Otago Daily Times – Mines deliver economic benefit if done well  
<https://www.odt.co.nz/opinion/mines-economic-boost-if-done-well>
- OceanaGold Macraes – Modern Mining Overview  
<https://oceanagoldmacraes.co.nz/about/about-us/modern-mining>
- Dunedin City Council – Economic Contribution  
[https://www.dunedin.govt.nz/\\_data/assets/pdf\\_file/0008/1126088/c997457f0ee0069d882ddf6ae528e39ee1ab9cf6.pdf](https://www.dunedin.govt.nz/_data/assets/pdf_file/0008/1126088/c997457f0ee0069d882ddf6ae528e39ee1ab9cf6.pdf)
- Otago Regional Council – Economic Impact Assessment  
<https://www.orc.govt.nz/media/3070/appendix-19-macraes-phase-iii-project-assessment-of-economic-impacts.pdf>

#### **Stockton Mine (West Coast)**

- New Zealand Treasury – Stockton Mine Drainage Business Case  
<https://www.treasury.govt.nz/sites/default/files/2025-12/stockton-mine-drainage-business-case.pdf>
- Minerals Council – Stockton Mine Case Study  
<https://mineralscouncil.co.nz/casestudies/stockton-mine/>
- Minerals Council – Stockton Mine Report  
<https://mineralscouncil.co.nz/wp-content/uploads/2023/02/Stockton-Mine-case-study.pdf>
- Stockton Mine Tours (Post-mining tourism example)  
<https://outwest.co.nz/stockton-mine-tours/>

#### **Waihi Gold Mine (New Zealand)**

- Social Impact Assessment – WSP  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0014/4145/B.57-WSP-Social-Impact-Assessment.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0014/4145/B.57-WSP-Social-Impact-Assessment.pdf)
- Recreation and Tourism Assessment – Greenaway  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0012/4143/B.55-Greenaway-Recreation-and-Tourism-Assessment.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0012/4143/B.55-Greenaway-Recreation-and-Tourism-Assessment.pdf)
- Economic Effects Assessment – Shamubeel Eaqub  
[https://www.fasttrack.govt.nz/\\_data/assets/pdf\\_file/0017/4139/B.51-Eaqub-Economic-Effects.pdf](https://www.fasttrack.govt.nz/_data/assets/pdf_file/0017/4139/B.51-Eaqub-Economic-Effects.pdf)

#### **D.4 International and Comparative References**

- Tailings Dam Failure Analysis (Azam & Li, 2010)  
<https://ksmproject.com/wp-content/uploads/2017/08/Tailings-Dam-Failures-Last-100-years-Azam2010.pdf>
- OECD – Material Resources, Productivity and the Environment  
[https://www.oecd.org/content/dam/oecd/en/publications/reports/2015/02/material-resources-productivity-and-the-environment\\_9789264190504-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2015/02/material-resources-productivity-and-the-environment_9789264190504-en.pdf)
- Parliamentary Commissioner for the Environment – Long-term Management of Tailings Dams  
<https://pce.parliament.nz/media/sxwnjffr/long-term-management-of-the-environmental-effects-of-tailings-dams.pdf>
- University of Auckland – Commentary on Mining Environmental Impacts (including Waihi context)  
<https://www.auckland.ac.nz/en/news/2024/06/10/is-it-fair-to-offshore-mining-s-environmental-toll-.html>

#### **D.5 Additional Reference Material**

- RNZ – New Zealand Wine Industry Outlook  
<https://www.rnz.co.nz/news/ldr/589969/theatre-s-accountant-goes-off-script-with-dire-wine-industry-predictions>
- Central Otago District Council – Economic Development Strategy 2025–2035  
<https://www.codc.govt.nz/repository/libraries/id:2apsqkk8g1cxbyoqohn0/hierarchy/Publications/Strategies%2C%20Policies%20%26%20Bylaws/Strategies/Economic%20Development%20Strategy.pdf>
- Central Otago District Council – Economic Development Strategy (consultation summary and objectives)  
<https://lets-talk.codc.govt.nz/shaping-central-otago-s-economic-future>
- End of the Wine? The mining threat to Central Otago’s vineyards  
<https://www.nzherald.co.nz/the-listener/new-zealand/end-of-the-wine-the-mining-threat-to-central-otagos-vineyards/KI2QUUN2ZJD43ORDMOF7DO4LN4/>
- Plan to set up Medical Services Trust  
<https://www.odt.co.nz/regions/central-otago/plan-set-medical-services-trust-after-55m-sale>

## Appendix E – Recommended Conditions of Approval

This appendix sets out recommended conditions intended to ensure that environmental effects are appropriately managed and that identified risks remain proportionate to the projects regional and national benefits.

### **Tailings Review Board**

A qualified Tailings Review Board should be established and maintained for the life of the project. The board should include an independent qualified person, and should undertake regular reviews of design, construction, operation, and closure of the tailings storage facility, with findings reported to the regulator and made publicly available.

### **Financial Assurance**

A ring-fenced financial assurance mechanism should be required, structured so that the bond increases progressively as the mine is developed, constructed, and operated. The level of assurance should reflect the scale and risk profile of the project at each stage, including closure, rehabilitation, and post-closure management obligations.

### **Groundwater and Surface Water Monitoring**

Comprehensive groundwater and surface water monitoring programmes should be implemented, with clearly defined trigger thresholds and response actions. Monitoring data should be independently audited and reported publicly at regular intervals.

### **Independent Environmental Auditing**

Regular independent environmental audits should be required, covering compliance with consent conditions, environmental management plans, and monitoring programmes.

### **Stakeholder Liaison Group**

A stakeholder liaison group should be established for the life of the project. The group should meet annually, and as needed for emerging issues, to review monitoring results, discuss concerns or risks, and record agreed actions. Meeting summaries should be provided to the regulator and made publicly available.

### **Cyanide and Hazardous Substances Management**

All cyanide and hazardous substances management should comply with internationally recognised standards, with independent verification. Storage, handling, and treatment systems should be subject to ongoing monitoring and audit.