

Memorandum on Completeness and Scope

File	FTAA-2608-1288
Application	Macraes Phase Four (MP4)
To	Daya Thomson, Team Lead LOA
From	[REDACTED] , Application Leads
Date	30 September 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Macraes Phase Four (MP4) application, lodged by Oceana Gold (New Zealand) Limited (the Applicant), received by the Fast-track Team on 9 September 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. We confirm that we do not have any conflict of interest in this matter that would prevent us making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The Application is a listed project.
6. The Application was lodged on 9 September 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive

application complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was not subject to a further information request therefore the date by which the EPA must make a decision under 46 is **30 September 2026**.

7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The project is described in Schedule 2 of the Act as:

In stages, expand the existing open pit and underground gold mining operations to enable output of approximately 130,000 ounces per annum.

9. The approximate geographical location is identified in Schedule 2 of the Act as:

13,500 hectares at Golden Point Road, Macraes Flat, East Otago.

10. The application is for the following activity:

the staged expansion of the existing Macraes open-pit and underground gold mining operation and its supporting infrastructure, to enable continued production of approximately 80,000 to 130,000 ounces of gold per annum, together with associated tailings management, waste rock disposal, water management, ecological mitigation, road realignments, and mine closure and rehabilitation activities.

11. The application relates solely to the listed project because it is explicitly described in the application documents as the Schedule 2 listing. It consists predominantly of expanding existing open-pit and underground gold mining operations, with ancillary infrastructure required to enable that mining (i.e. tailings relocation and storage, waste rock disposal, road and utility relocations, significant water management infrastructure, ecological offset and restoration projects, and eventual rehabilitation and closure of the expanded mining areas.)
12. The stated production range fits the *approximate* per annum rate described in the listing. The application states an output of approximately 80,000 to 130,000 ounces per annum. Although the lower bound of 80,000 is less than the listing states, it is within an approximate range.
13. The geographical location of the application matches the listed description with all disturbance areas falling at Golden Point Road.

Fast-track consenting application process

Legislative context

14. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
15. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

16. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
17. This application has been lodged by Oceana Gold (New Zealand) Limited. This person is an authorised person under the Act because they are listed in schedule 2 of the Act for this application listing.
18. The approvals being sought are:
 - an approval described in section 42(4)(a), (c) or (d) (resource consent, certificate of compliance or designation);
 - A resource consent, change to or cancellation of a resource consent: **checklist A**;
 - including subdivision or reclamation: **checklist A1**;
 - an approval described in section 42(4)(h) (wildlife approval), **checklist E**;
 - an approval described in section 42(4)(i) (archaeological authority), **checklist F**;
 - an approval described in section 42(4)(j) (complex freshwater fisheries approval), **checklist G**;
19. All of the above listed approvals are of the type set out in section 42(4) of the Act
20. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

21. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

22. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
23. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
24. As set out in more detail in Appendix 2, many agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required. There were two exceptions:
 - a. Otago Regional Council highlighted some areas of the application that could be subject to further information requests. These requests were not intended to be completeness issues and therefore they will be passed to the Panel to consider once appointed. The full commentary from Otago Regional Council is published alongside this memorandum.
 - b. Heritage New Zealand advised the information required by section 44 is provided in **insufficient** detail to satisfy the purpose for which it is required. The commentary from Heritage New Zealand has been included in the tables within Appendix 1 and is published alongside this memorandum.
 - i. There was an attempt to consult further with Heritage New Zealand on this response that proved to be unfruitful. A meeting was held with the Applicant to discuss the concerns raised by the consultation, a summary of which is included in Appendix 2.

Ineligibility

25. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.
26. The list of ineligible projects includes activities:
 - on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
 - on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;

- in a customary marine or protected customary rights area without written agreement from the rights holder/group;
- within an aquaculture settlement area without the required authorisation;
- activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
- that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
- That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
- That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
- That are undertaken for the purposes of an offshore renewable energy project.

27. We consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Notification by applicant

28. Pre-lodgement requirements for a listed project require the applicant to notify in writing the persons and groups referred to in section 29(1)(aa). The persons and groups notified have 20 working days to respond from the date of the notice. The applicant must not lodge their substantive application until each 20-working day period has elapsed.
29. However, if consultation with persons and groups specified in section 29 began prior to the amendments to the FTAA coming into force then schedule 1, clause 11 applies wherein the previous version of section 29 applies to the application.
30. Consultation records within the Application began in late 2025, making the previous section 29 applicable to this Application. There is evidence of consultation with all groups listed in the previous section 11, meeting the requirements of section 29(1)(a).

Fees and levies

31. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:
- Application fee in the sum of \$250,000 plus GST;
 - Levy in the sum of \$140,000 plus GST.

Consultation

32. We have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:
- Otago Regional Council, Waitaki District Council, and Dunedin City Council for:
 - i. an approval described in section 42(4)(a) (resource consent)
 - ii. an approval described in section 42(4)(b) (change or cancellation of resource consent condition)
 - The Department of Conservation for:
 - i. an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
 - ii. an approval described in section 42(4)(j) (complex freshwater fisheries activity approval);
 - Heritage New Zealand Pouhere Taonga for an approval described in section 42(4)(i) (archaeological authority);
33. A summary of the consultation is included as Appendix 2.

Assessment of compliance for each section of each application form

34. We have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
35. Our view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
36. The EPA must now decide whether the substantive application has a competing application under section 47A(1) (under delegation from the Minister for Infrastructure under section 47C) within 10 working days from the date of the completeness decision.
37. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that an expert consenting panel can be set up to commence consideration and decision of the application.

Assessment of compliance with clause 7 of schedule 8

38. Under section 42(9)(b) of the Act, an application that includes an approval for an archaeological authority may also include an application under clause 7 of Schedule 8 (application for approval of person to carry out activity).
39. This application does include that additional application for an approval of a person to carry out activity. The information required under clause 7(5) of schedule 8 has been addressed in the application documents, specifically within documents A.14 and B.43G.

Appendix 1: Assessment of section 44 sufficiency

Our assessment of the application materials is set out in the relevant checklists below:

CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	Application Reference	EPA
5(1)(a)	A description of the proposed activity	Part A.06 Project Description, Sections 6.1 - 6.15, pp. 136 - 242.	Addressed as referenced.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	Part A.05 Existing Environment, Section 5.2, pp. 29 - 31. Part A.05 Existing Environment, Section 5.7.7, pp. 76 - 77.	Addressed as referenced. i) Addressed in A.05 (page 76). ii) N/A – addressed in A.11 (page 497). iii) N/A – addressed in A.05 (page 76).

		Part E.02 MP4 Overview Plan.	
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid.	Part A.11 Fast-Track Approvals Act Requirements, Section 11.4, pp. 494 – 509.	Addressed as referenced.
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the applicant must include a statement to that effect (clause 5(6)).	J.01 Landowner Details and Records of Title for the MP4 Project Land Area J.03 Landowner Details for Land Adjacent to the MP4 Project Land	Addressed as referenced.

5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	Part A.06 Project Description, Sections 6.1 - 6.15, pp. 136 - 242.	Addressed as referenced.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates	Part A.07 Approvals Sought Under the FTAA, Section 7.2.1, pp. 244 - 245. Part F - Relationship of Existing Mining Activities with MP4	Addressed as referenced.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	Part A.12 Statutory Assessment Relating to the RMA, Sections 12.2.1 - 12.2.3, pp, 513 - 516.	Addressed as referenced.

5(1)(h) (and also clauses 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and • any other requirements in any of those documents.	Part A.12 Statutory Assessment Relating to the RMA, Section 12.3, pp. 516 – 624.	Addressed as referenced.
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5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and (ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	Part A.12 Statutory Assessment Relating to the RMA, Section 12.3.18, pp. 623—624.	A description is provided in A.12. The requirements of this clause are addressed by the statement on page 624 of A.12: “<i>MP4 is not inconsistent with the Ngāi Tahu Claims Settlement Act</i>”. This is sufficient for completeness.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or applicants under the Marine and Coastal Area (Takutai Moana) Act 2011;	N/A	N/A
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	Part D.01 Consent Conditions Index and Definitions Part D.02 Schedule 1 - Common Conditions (All Councils) Part D.03 Schedule 2 -	Addressed as referenced.

		District Council Conditions Part D.04 Schedule 3 - Otago Regional Council Consents Part D.05.1 Schedule 4 - Condition Figures, Tables and Attachments PART ONE Part D.05.2 Schedule 4 - Condition Figures, Tables and Attachments PART TWO	
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware	Part G.03 FTAA Section 30 Correspondence	Addressed as referenced.

	of about the existing resource consent referred to in the notice.		
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	Part A.09 Assessment of Effects, pp. 305 - 464. Numerous supporting technical assessments contained in Part B - Technical Reports.	Addressed as referenced.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	Part A.09 Assessment of Effects, pp. 305 - 464. Numerous supporting technical assessments contained in Part	Addressed as referenced.

		B - Technical Reports.	
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons	Part A.09 Assessment of Effects, pp. 305 - 464. Part A.10 Management and Monitoring of Effects, pp 465 - 493. Numerous supporting technical assessments contained in Part B - Technical Reports.	Addressed as referenced a) Yes b) Yes, including B.47 c) Yes, including B.44 and B.45. d) Yes e) Yes, including documents in Part J f) Yes, N/A g) Yes, primarily A.10 h) Yes, N/A

	consulted, including the views of iwi or hapū that have been consulted in relation to the proposal: (f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right.		
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or	Part A.09 Assessment of Effects, pp. 305 - 464. Numerous supporting technical assessments contained in Part B - Technical Reports.	Addressed as referenced.

	cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.		
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991)	Part I - Assessment of RMA Approvals Required	Addressed as referenced – section 4.9 permitted activities, pg 79-82.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document	N/A	N/A

5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	N/A	N/A
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CHECKLIST A1 – Subdivision or reclamation resource consent

Clause, Schedule 5	Information required for an application for a subdivision consent or a reclamation consent (in addition to the information required in Checklist A)	Application Reference	EPA
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If this application is for a subdivision consent, please adequately define the matters set out in clause 8(1) below. If no subdivision consent is sought, please enter n/a.

8(1)(a)	The position of all new boundaries	N/A	N/A
8(1)(b)	The areas of all new allotments, unless the subdivision involves a cross lease or company lease or unit plan	N/A	N/A
8(1)(c)	The locations and areas of new reserves to be created, including any esplanade reserves and esplanade strips	N/A	N/A

8(1)(d)	The locations and areas of existing esplanade reserves, esplanade strips, and access strips	N/A	N/A
8(1)(e)	The locations and areas of any part of the bed of a river or lake to be vested in a territorial authority under section 237A of the Resource Management Act 1991	N/A	N/A
8(1)(f)	The locations and areas of any land within the coastal marine area that is to become part of the common marine and coastal area under section 237A of the Resource Management Act 1991	N/A	N/A
8(1)(g)	The locations and areas of land to be set aside as new roads	N/A	N/A

If this application is for a reclamation consent, please include the information to show the area to be reclaimed set out in clause 8(2) below. If no reclamation consent is sought, please enter n/a.

8(2)(a)	The location of the area to be reclaimed	Part B.26 Assessment of Aquatic Environmental Effects (Viridis), Section 4.5, pp. 22.	Addressed as referenced – two areas of reclamation sought, Trimbells Gully and Clydesdale Creek Tributary.
8(2)(b)	If practicable, the position of all new boundaries	N/A	N/A – not provided.

8(2)(c)	Any part of the reclaimed area to be set aside as an esplanade reserve or esplanade strip	N/A	N/A
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CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	Part A.06 Project Description, Section 6, pp 139 - 242, Part A.13 Wildlife Approvals p. 625.	Addressed as referenced - Activities only relate to protected lizards.
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)	Part A.13 Wildlife Approvals, Section 13.1 pp 625–626 Part A.09 Assessment of Effects Section 9.6	Addressed as referenced No activities applied for are to be carried out on Public Conservation Land.

		pp 360 - 384 Part A.10 Management and Monitoring of Effects Table 10-1 p. 471 - 475 Part B.22 Residual Effects Analysis - Terrestrial Ecology Section 4 pp 23—28, Part C.04 Lizard Monitoring and Management Plan Section 4.3 pp 20 – 27, Part C.01 Avifauna Monitoring and Management Plan Section 5 pp 18 – 26.	
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	Part A.13 Wildlife Approvals, Section 13.1 pp. 626—628 Part A.09 Assessment of Effects, Section 9.6,	Addressed as referenced. DOC notes: <i>“Comprehensive descriptions of the full suite of anticipated impacts (direct, indirect, residual and cumulative) to each of the relevant</i>

		pp. 360 - 384 Part A10 Management and Monitoring of Effects, Table 10-1, pp. 471 - 475 Part B.22 Residual Effects Analysis - Terrestrial Ecology, Section 5.5, pp. 42 – 49.	<i>lizard species have been described. Impacts and activities have been tied back to the purpose of the Wildlife Act and describe a range of anticipated protective benefits to lizard fauna. Sufficient information has been provided.”</i>
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Part A.05 Existing Environment, Section 5.13 – 5.17 pp 88 -113 Part A.13 Wildlife Approvals, Section 13.1 pp 628–630 Part B.19 Lizard Values Assessment Section 4.13 Tables 4.12 and 4.13 p.83 Part B.20 Avifauna Values Assessment	Addressed as referenced. A summary of information to be found in the Application is present in document A.13 (pages 629- 630). Section 5.17 of A.05 is more comprehensive (pages 100-112).

		Section 3.3 pp 44 – 48.	
2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	Part A.13 Wildlife Approvals, Section 13.1, pp 630–631 Part A.09 Assessment of Effects, Section 9.6, pp 360 - 384 Part B.21 Bat Values Assessment, Section 4.1, pp 23 – 25 Part B.19, Lizard Values Assessment, Section 5.1, Table 5.2 p.91 Part B.20 Avifauna Values Assessment, Section 4.1.3, pp 92 – 93 Part B.18 Invertebrate Values Assessment, Section 4.2.6, pp 48 – 54 Part C.01 Avifauna	Addressed as referenced.

		Monitoring and Management Plan, Section 3, pp 8 – 14.	
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	Part A.13 Wildlife Approvals, C.04 Lizard Management and Monitoring Plan and C.01 Avifauna Monitoring and Management Plan.	Addressed on page 631 of A.13. Specified details are included in the management plans referenced, specifically C.04 for the approval sought. For example, page 4 of C.04 states: <i>“Recognising the limitations of salvage and relocation programmes, the Plan adopts a precautionary approach and acknowledges that complete recovery of all lizards cannot be guaranteed. The programme therefore focuses on applying best-practice management techniques, ensuring appropriate resourcing, and implementing adaptive management where necessary.”</i> DOC notes: <i>“Sufficient information has been provided to inform the assessment.”</i>

			In conclusion, we believe this clause is addressed in sufficient detail.
2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Part A.13 Wildlife Approvals Section 13.1 p. 631 C.04 Lizard Management and Monitoring Plan Section 4 pp 16 – 42.	Addressed as referenced.
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	Part A.13 Wildlife Approvals, Section 13.1 pp 631—632; Part B.17 Ecological Impact Assessment for Terrestrial and Wetland Ecology Values Section 2.1 pp 16 - 19, Part B.22 Residual Effects Analysis - Terrestrial Ecology Section 2 pp 11 - 16, Part C.04 Lizard	Project site is clearly defined as referenced, with site locations mapped, as referenced. In particular, figure 4.3 of document C.04.

		Management and Monitoring Plan Section 4.3 Figure 4.1 p.20.	
2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Part A.13 Wildlife Approvals, Section 13.1 p. 632 Part C.04 Lizard Management and Monitoring Plan Section 4.5-6 pp 38 - 39.	Addressed as referenced – authorisation sought to relocate.
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Part A.13 Wildlife Approvals, Section 13.1 p. 632 Part A.09 Assessment of Effects Section 9.6 pp 360 - 384 Part B.17 Ecological Impact Assessment for Terrestrial and Wetland Ecology Values Section 6 pp	Addressed as referenced.

		80 – 268 Part B.22 Residual Effects Analysis - Terrestrial Ecology Sections 4-7 pp 23 - 73.	
2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Part A.13 Wildlife Approvals, Section 13.1 p. 632, Part A.09 Assessment of Effects Section 9.6 pp 360 - 387, Part A.10 Management and Monitoring of Effects Table 10-1 pp 471 - 475, Part C.04 Lizard Management and Monitoring Plan Section 3.1 pp 12 – 15, Part C.01 Avifauna Monitoring and	Addressed as referenced. DOC notes: <i>“The documents package includes a full assessment of effects and detailed discussion on measures to avoid, minimise, mitigate, offset and compensate impacts. Impacts to lizards are described within the Ecological Impact Assessment for Terrestrial and Wetland Ecology Values report. Descriptions to avoid, minimise and mitigate impacts to lizards are described within the Lizard Management and Monitoring Plan. Residual effects management is described within the Residual Effects Analysis: Terrestrial Ecology report. Between these documents a sufficient level of information has</i>

		Management Plan Section 8.3 pp 30 – 37, Part C.02 Invertebrate Management and Monitoring Plan Section 3 pp 9 - 19 Part C.06 Residual Effects Terrestrial Restoration Plan Section 2-3 pp 11 – 16.	<i>been provided to inform the assessment.”</i>
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	Part A.13 Wildlife Approvals Section 13.1 pp 632–633.	Addressed as referenced.
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Part A.13 Wildlife Approvals Section 13.1 pp 632–633.	Addressed as referenced.
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	Part A.13 Wildlife Approvals, Section 13.1 p. 633, Part A.08	Addressed, partly as referenced. A list of Taonga Species is included in document B.04 which indicates

		Consultation and Engagement Section 8.1-8.6 pp 265 – 304 Part G.01 - Kā Rūnaka Letter re Development of Treaty Settlement Impact Assessment.	discussion of wildlife impacts has occurred with hapū or iwi.
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	Part A.13 Wildlife Approvals, Section 13.1 p. 633 and several Technical Reports and Management Plans	Addresses as referenced.

CHECKLIST F – Archaeological authority

Clause, Schedule 8	Information required for an approval described in section 43(3)(i) Archaeological Authority	Application Reference	EPA
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2(1)(a)	a legal description of the land or, if one is not available, a description that is sufficient to identify the land to which the application relates	Part A.14 Heritage Approvals, Section 14.1 pp. 634 Part J.01 and J.04 Landownership and Records of Title Part D.06 Proposed Archaeology Authority Conditions	Addressed, as referenced.
2(1)(b)	the name of the owner of the relevant land, if the applicant is not the owner of the land	Part A.14 Heritage Approvals, Section 14.1 pp. 634 Part J.01 and J.04 Landownership and Records of Title Part D.06 Proposed Archaeology Authority Conditions	Addressed, as referenced.
2(1)(c)	proof of consent, if the owner of the relevant land has consented to the proposed activity	Part A.14 Heritage Approvals, Section 14.1, pp. 634 - 635 Part G.04 Camp Creek Dam – Access	Addressed, as referenced. Note A.14 page 634 incorrectly references G.01, the reference should be document G.04.

		and Easement Option Agreement	
2(1)(d)	confirmation that the application complies with section 42 , 43, and 44 of the Act	Part A.11 Fast-track Approvals Act Requirements, Section 11.1 - 11.4 pp 494 - 506 Part A.14 Heritage Approvals, Section 14.1 pp. 635 - 637 Part A.12 Statutory Assessment relating to the RMA, Section 12.1, pp. 510 - 513	Addressed, as referenced.
	confirmation that the application relates solely to a listed project or a referred project	Part A.04 Introduction, Section 4.1, pp. 2	Addressed, as referenced.
	any fee, charge, or levy payable under regulations in respect of the application is paid.	Part A.00 Cover Letter to the Environmental Protection Agency, Attachment 1	Addressed, as referenced.

2(1)(e)	a description of each archaeological site to which the application relates and the location of each site	Part A.14 Heritage Approvals, Section 14.1 pp 635 – 636; Part B.43.1 Archaeological Assessment Section 6.2 pp 28–34, Section 6.3 pp 36–37, 44–46, Section 7.3 pp 63–66, Section 8.2 pp 75, 78–85; Part B.43.2 Archaeological Assessment Section 9.2 pp 120, 124–128, Section 10.2 pp 134, 138, 140–167, Section 11.2 pp 175–186; Part B.43.3 Archaeological Assessment Section 12.2-3 pp 191–216,	Addressed, as referenced for all six sites. Heritage noted: <i>“While there is a description and location for each recorded archaeological site to which the application relates included in the archaeological assessment (as required in Schedule 8 Clause 2 (1)(e) of the FTAA), the description of the Chinese Miner’s Camp (I41/50) is lacking a clear understanding of the extent of the site.”</i> This site is included in the approval sought for Innes Mills and Macraes Road Realignment and mapped on page 5 of C.15. This description is in sufficient detail to satisfy this clause.
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2(1)(f)	a description of the activity for which the authority is sought	Part A.14 Heritage Approvals Section 14.1 p. 636, Part A.06 Project Description, Section 6 pp 139 – 242, Part A.07 Approvals Required under the Fast-Track Approvals Act pp 243 – 264 and Part B.43.1 Archaeological Assessment – Section 6.8 pp 55–56, Section 7.8 pp 71, Section 8.8 pp 119; Part B.43.2 Archaeological Assessment – Section 10.1 pp 133, Section 10.8 pp 170-171; Part B.43.3 Archaeological	Addressed, partly as referenced. Six authorities are sought at six grouped locations. Coronation Pit and Trimbells WRS – description at pages 57-71 of B.43.1 (Part 1) and in C.11. Innes Mills and Macraes Road Realignment – description at pages 24-56 of B.43.1 (Part 1) and C.15. Golden Bar Bit and WRS – description at pages 72-119 of B.43.1 (Part 1 and 2) and C.16. Coal Creek Dam – description at pages 133-171 of B.43.1 (Part 2) and C.12. Camp Creek Dam – description at pages 172-188 of B.43.1 (Part 2 and 3) and C.13. MEEA – description at pages 189-220 of B.43.1 (Part 3) and C.14.
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		Assessment – Section 11.8 pp 188, Section 12.8 pp 220	
2(1)(g)	a description of how the proposed activity will modify or destroy each archaeological site	Part A.14 Heritage Approvals, Section 14.1 p. 636 Part B.43.1 Archaeological Assessment Section 6.6 pp 52–54, Section 7.6 pp 70; Part B.43.2-3 Archaeological Assessment Section 8.6 pp 117–118, Section 9.6 pp 132, Section 10.6 pp 169, Section 11.6 pp 187–188; Part B.43.3 Archaeological Assessment Section 12.6 pp 219–220	Addressed, partly as referenced – as above.

2(1)(h)	except in the case of an approval described in section 44(b) of the HNZPT Act, an assessment of— (i) the archaeological, Māori, and other relevant values of the archaeological site in the detail that is appropriate to the scale and significance of the proposed activity and the proposed modification or destruction of the archaeological site; and (ii) the effect of the proposed activity on those values	Part A.14 Heritage Approvals, Section 14.1 p. 636 Part B.43.1 Archaeological Assessment – Section 4 pp 8—9	Addressed, as referenced. Heritage notes: <i>“the description of the Chinese Miner’s Camp (I41/50) is lacking a clear understanding of the extent of the site. This impacts the ability to assess how the proposed activity will modify or destroy this site and the effect it will have on the values of I41/50 (as required in Schedule 8 Clause 2(1)(g) and (h) of the FTAA).”</i> AND <i>“There is an assessment of the archaeological, Māori, and other relevant values of the archaeological sites included in the application, however this is not in the detail appropriate to the proposed modification and destruction of archaeological sites as required in Schedule 8 Clause 2(1)(h) of the FTA Act.”</i> We have not been able to clarify these statements with Heritage
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			New Zealand. However, the application has addressed what is required at the completeness stage. Further assessment of this clause could be subject to an RFI, but it would not be appropriate to do so at the completeness stage as the information is present in sufficient detail to assess.
2(1)(i)	a statement as to whether consultation with tangata whenua, the owner of the relevant land (if the applicant is not the owner), or any other person likely to be affected— (i) has taken place, with details of the consultation, including the names of the parties and the tenor of the views expressed; or (ii) has not taken place or been completed, with the reasons why consultation has not occurred or been completed (as applicable).	Part A.14 Heritage Approvals, Section 14.1 p. 637 Part A.08 Consultation and Engagement Section 8.1-6 pp 265 – 304 Part G.04 Camp Creek Dam – Access and Easement Option Agreement	Addressed, as referenced. Also included in A.08.

CHECKLIST G – Complex freshwater fisheries approval

Clause, Schedule 9	Information required for an approval described in section 42(4)(j) (complex freshwater fisheries approval), clause 3 of Schedule 9	Application Reference	EPA
3(a)	in relation to the structure and any fish facility: (i) a description of the type of structure or fish facility: (ii) the dimensions of the structure or fish facility: (iii) the design of the structure or fish facility: (iv) the placement of the structure or fish facility: (v) the water flows: (vi) the operating regime	Part A.15 Complex Freshwater Fisheries Approvals, Section 15.1.1, pp 638 Part B.27 Coal Creek and Camp Creek Dams - Schedule 9 Fish Passage Assessment (Viridis)	The application is for: 1. An approval under the complex freshwater fisheries for two dams (reg 42) – Dams. 2. A dispensation for various diversion structures and culverts (reg 43) – Dispensations. Dams. For the two dams proposed in Camp and Coal Creeks all information is provided as referenced (predominantly in B.27). Dispensations. This clause is primarily addressed in A.06 page 150-151 in relation to the diversion channel sought. For culverts sought there is a statement

			on pages 263-264 of A.07 describing detailed design is to be provided at a later date. DOC notes that the information in relation to the MEEA culverts will be determined at detailed design stage and does not consider this to be a completeness issue. Upon review of the information, we consider that the information is in sufficient detail for the purpose for which it is required, noting that DOC is the regulator for this approval.
3(b)	the freshwater species and values present (with particular focus on threatened, data-deficient, and at-risk species as defined in the New Zealand Threat Classification System)	Part A.15 Complex Freshwater Fisheries Approvals, Section 15.1.2, pp 638 Part B.27 Coal Creek and Camp Creek Dams - Schedule 9 Fish Passage Assessment (Viridis)	Addressed, as referenced for both approval types.

3(c)	the water quality and quantity in the surrounding habitat (at the proposed structure location, upstream and downstream)	Part A.15 Complex Freshwater Fisheries Approvals, Section 15.1.3, pp 639 - 641 Part B.27 Coal Creek and Camp Creek Dams - Schedule 9 Fish Passage Assessment (Viridis)	Addressed, as referenced for both approval types.
3(d)	how the passage of fish will be provided for or impeded	Part A.15 Complex Freshwater Fisheries Approvals, Section 15.1.4, pp 641 Part B.27 Coal Creek and Camp Creek Dams - Schedule 9 Fish Passage Assessment (Viridis)	Addressed, as referenced for both approval types. Also present in A.07 (pages 263-264).

CHECKLIST J – Listed project information requirements

Section, Fast-track	Information required for a substantive application under section 43(2) and section 13(4)	Application Reference	EPA
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Approvals Act			
13(4)(a)	a description of the project and the activities it involves	Part A.06 Project Description, Sections 6.1 - 6.15, pp. 136 - 242.	Addressed, as referenced.
13(4)(c)	information to demonstrate that the project does not involve any ineligible activities (other than activities that may be the subject of a determination under section 23 or 24)	Part A.11 Fast-track Approval Act Requirements, Section 11.6, pp. 507 - 508.	Addressed, as referenced.
13(4)(d)	a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application	Part E.02 MP4 Overview Plan.	Addressed, as referenced.
13(4)(e)	the anticipated commencement and completion dates for construction activities (where relevant)	Part A.06 Project Description, Section 6.3, pp. 143 - 144.	Addressed, as referenced.
13(4)(f)(i)	a statement of whether the project is planned to proceed in stages and, if so an outline of the nature and timing of the stages	Part A.06 Project Description, Section 6.3, pp. 143.	Addressed, as referenced.

13(4)(h)	a description of the anticipated and known adverse effects of the project on the environment and the significance of those adverse effects	Part A.09 Assessment of Effects, pp. 305 - 464.	Addressed, as referenced.
13(4)(i)	a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991	Part A.07 Approvals Sought Under the FTAA, Section 7.2.2, pp. 246.	Addressed, as referenced. The Applicant states: “MP4 does not involve any activities that would be prohibited activities under the RMA.”
13(4)(j)	a list of the persons and groups the applicant considers are likely to be affected by the project, including— (i) relevant local authorities: (ii) iwi authorities and groups that represent hapū that are parties to relevant Mana Whakahono ā Rohe or joint management agreements: (iii) other relevant iwi authorities: (iv) relevant Treaty settlement entities: (v) relevant protected customary rights groups and customary marine title groups: (vi) ngā hapū o Ngāti Porou, if the project area is within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou:	Part A.08 Consultation and Engagement, Section 8.1 - 8.3, pp. 265 - 280	Addressed, as referenced.

	(vii) relevant applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011: (viii) persons with a registered interest in land that may need to be acquired under the Public Works Act 1981:		
13(4)(k)	a summary of— (i) the consultation undertaken for the purposes of section 29 and any other consultation undertaken on the project with the persons and groups referred to in paragraph (j); and (ii) how the consultation has informed the project:	Part A.08 Consultation and Engagement, Section 8.1 - 8.6, pp. 265 - 304	Addressed, as referenced.
13(4)(ka)	a summary of how any responses provided to the notification under section 29(1)(aa) have informed the project	N/A - See Part A.08 Consultation and Engagement, Section 8.1, pp. 265 - 266.	Addressed, as referenced. As discussed in the body of the memo, pre-lodgement engagement with all parties began prior to 29(1)(aa) being in force. Schedule 1, clause 11 allows consultation under the old section 29 in this case. Old section 29 requirements are met in this case.

13(4)(l)	a list of any Treaty settlements that apply to the project area, and a summary of the relevant principles and provisions in those settlements	Part A.12 Statutory Assessment Relating to the RMA, Section 12.3.18, pp. 623 - 624	A.08, page 266, the Applicant states: <i>“Per the letter attached in Part G.01 of this substantive application, mana whenua have indicated that they expect to be able to provide a final version of the Treaty Settlement Impact Assessment to the EPA prior to the Panel Convener Conference.”</i> The statement above does not satisfy the requirements of this clause; however, the Applicant has addressed this clause in sufficient detail on pages 623-624 of A.12.
13(4)(m)	a description of any processes already undertaken under the Public Works Act 1981 in relation to the project	N/A	Addressed in application in document A.05, pages 59-60. Would not conclude that this is N/A, but clause is covered sufficiently.
13(4)(n)	a statement of any relevant principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019	N/A	N/A
13(4)(o)	information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area	There are no parcels of Māori land, marae or identified wāhi	Addressed, as referenced – and in document A.11.

		tapu in any district or regional plan, within the project area - Refer Part A.05 Environmental Setting	
13(4)(p)	a statement of whether the applicant is seeking a determination under section 23 and, if so, an assessment of the effects of the activity on the relevant land and on the rights and interests of Māori in that land	N/A	N/A
13(4)(q)	a statement of whether the applicant is seeking a determination under section 24(2) and, if so, a description of— (i) the scale and adverse effects of the existing electricity infrastructure; and (ii) how, if at all, that scale or those adverse effects are anticipated or known to change as a result of the maintenance, upgrading, or continued operation of the infrastructure	N/A	N/A
13(4)(r)	a statement of whether the applicant is seeking a determination under section 24(4) and, if so,— (i) a description of every alternative site considered by the applicant (or, if the referral application is lodged by	N/A	N/A

	more than 1 person, any of those persons) for the construction and operation of the new electricity lines (the activity); and (ii) for each alternative site considered,— (A) a statement of the anticipated and known financial cost of undertaking the activity; and (B) a description of the anticipated and known adverse effects of undertaking the activity; and (C) a description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity; and (D) a description of any issues (including financial cost) that would make it impractical to undertake the activity on the site; and (E) an assessment of whether it would be reasonable and practical to undertake the activity on the site, taking into account the matters referred to in subparagraphs (A) to (D) and any other relevant matters		
13(4)(s)	a description of the applicant's legal interest (if any), or if the application is lodged by more than 1 person, the legal interest	Part A.05, Section 5.6.2, pp. 62.	Addressed, as referenced.

	of any of those persons) (if any), in the land on which the project will occur, including a statement of how that affects the applicant's ability to undertake the work	Part J.02 Landowner Details Grouped by Project Element	
13(4)(t)	an outline of the types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) that the applicant considers are needed to authorise the project, including any that the applicant considers may be needed by someone other than the applicant	Part A.07 Approvals Sought under the FTAA, Section 7.1 - 7.5, pp 243 - 264 Part A.05, Section 5.6.2, pp. 62. Part I Assessment of RMA Approvals Required	Addressed, as referenced.
13(4)(u)	whether any activities that are involved in the project, or are substantially the same as those involved in the project, have been the subject of an application or a decision under a specified Act and,— (i) if an application has been made, details of the application: (ii) if a decision has been made, the outcome of the decision and the reasons for it:	Part A.11 Fast-track Approval Requirements, Section 11.4, pp. 498 - 500	Addressed, as referenced.
13(4)(v)	a description of whether and how the project would be affected by climate change and natural hazards	Part A.11 Fast-track Approval Requirements,	Addressed, as referenced.

		Section 11.4, pp. 500 - 501 Part A.12 Statutory Assessment Relating to the RMA Numerous technical assessment contained in Part B	
13(4)(w)	if the application is lodged by more than 1 person, a statement of the proposed approval to be held by each of those persons	N/A	N/A
13(4)(x)	a summary of compliance or enforcement actions (if any), and the outcome of those actions, taken against the applicant (or if the application is lodged by more than 1 person, any of those persons) under a specified Act	Part A.11 Fast-track Approval Requirements, Section 11.4, pp. 501 - 503	Addressed, as referenced.
13(4)(y)	Please provide the information specified below for the relevant approval(s) sought. This is the information specified in the relevant schedule.		
13(4)(y)(i), clause 2 of Schedule 5	Resource consent or designation (a) an assessment of the project against— (i) any relevant national policy statement; and	Part A.12 Statutory Assessment Relating to the RMA, Section 12.3, pp 516 - 542	Addressed, as referenced.

	(ii) any relevant national environmental standards; and (iii) if relevant, the New Zealand Coastal Policy Statement; and		
	(b) in relation to any proposed approval that is a resource consent, whether, to the best of the applicant's knowledge, there are any existing resource consents of the kind referred to in section 30(3)(a).	Part A.11 Fast-track Approval Requirements, Section 11.3, pp. 495 Part G.03 FTAA Section 30 Correspondence	Addressed, as referenced.
13(4)(y)(ii), clause 3 of Schedule 5	Change or cancellation of resource consent condition The information to be provided under section 13(4)(y)(ii) is information about whether and how the change or cancellation of the condition is material to the implementation or delivery of the project.	Part A.07 Approvals sought under the Act, Section 7.2, pp. 260. Part F.01 Existing Resource Consents and Their Relationship with the MP4 Application	Addressed, as referenced.

13(4)(y)(iii), clause 4 of Schedule 5	Certificate of compliance The information required to be provided under section 13(4)(y)(iii) is information that shows the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent. Include information that shows that the activity that the certificate of compliance is intended to cover can be done lawfully in the particular location without a resource consent.	N/A	N/A
13(4)(y)(iv), clause 2 of Schedule 6	Concession (1) The information in subclause (2) is required to be provided under section 13(4)(y)(iv) if a proposed concession includes a lease and— (a) the lease would be for a term (including any renewals) that will or is likely to be more than 50 years; and (b) the granting of the lease would trigger a right of first refusal or a right of offer or return. (2) Confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.	N/A	N/A

13(4)(y)(v), clause 23 of Schedule 6	Land exchange (1) The information required to be provided under section 13(4)(y)(v) is (a) - (e) below: (a) a description of both land areas proposed for exchange (for example, maps showing areas and location, addresses, and legal descriptions where possible:	N/A	N/A
	(b) the financial value of the land proposed to be acquired by the Crown:	N/A	N/A
	(c) a brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate: <i>Guidance note: This must include an explanation of why the exchange would benefit the conservation estate; and details of anything registered or noted for conservation purposes on the record of title for the land to be acquired by the Crown (clause 23(1A) of Schedule 6)</i>	N/A	N/A
	(d) if the land exchange would trigger a right of first refusal or a right of offer or return, confirmation that the applicant has written agreement from the holder of the right of first refusal or right of offer or return that the	N/A	N/A

	holder has agreed to waive that right for the purpose of the land exchange:		
	(e) confirmation by the applicant that no part of any land to be exchanged by the Crown is – (i) land listed in Schedule 4; or (ii) a reserve declared to be a national reserve under section 13 of the Reserves Act 1977	N/A	N/A
13(4)(y)(vi), clause 4A of Schedule 5	Standard freshwater fisheries activity approval (4A) The information required to be provided under section 13(4)(y)(vi) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure) and the extent to which the proposed structure may impede fish passage; and (b) whether any fish salvage activities are proposed.	N/A	N/A
13(4)(y)(via), clause 2 of Schedule 9	Complex freshwater fisheries activity approval (2) The information required to be provided under section 13(4)(y)(via) is the following: (a) whether an in-stream structure is proposed (including formal notification of any dam or diversion structure)	Part A.07 Approvals sought under the Act, Section 7.5, pp. 263 - 264. Part A.15 Complex Freshwater Fisheries	Addressed, as referenced. DOC notes: <i>“Fish salvage will occur where required and is to be to sites where</i>

	and the extent to which this may impede fish passage; and (b) whether any other complex freshwater fisheries activities are proposed.	Approvals Part B.27 Coal Creek and Camp Creek Dams - Schedule 9 Fish Passage Assessment (Viridis)	<i>the species already occur. The release sites are not on PCL.”</i>
13(4)(y)(vii), clause 2 of Schedule 10	Marine consent (1) The information required to be provided under section 13(4)(y)(vii) is– (a) information about whether the Minister of Conservation is an affected person:	N/A	N/A
	(b) additional information about whether the applicant has already made an application for a consent under the EEZ Act in relation to the project, and, if so,— (i) details of any application made; and (ii) the decisions made on that application; and (iii) information about the matters that the Minister may consider under section 22(6):	N/A	N/A
	(c) additional information (in a summary form) about compliance or enforcement action taken against the applicant by the EPA under the EEZ Act.	N/A	N/A

13(4)(y)(viii), clause 2 of Schedule 11	Access arrangement (1) Confirmation that the applicant has complied with section 29 (for the purposes of section 13(4)(y)(viii)).	N/A	N/A
13(4)(y)(ix), clause 15 of Schedule 11	Mining permit (1) For the purposes of section 13(4)(y)(ix), the information is— (a) a copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown owned mineral: (b) the name and contact details of the proposed permit participants and the proposed permit operator: (c) a proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both: (d) evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme: (e) information about the proposed permit holder's history of compliance with mining or similar permits and their conditions: (f) the proposed date on which the substantive application is intended to be lodged:	N/A	N/A

	(g) if the authorised person proposes to provide information under section 37, the date on which the person intends to provide that information: (h) the proposed duration of the permit: (i) if the proposed approvals include a mining permit for petroleum,— (i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource to which the development plan relates: (ii) the resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System: (iii) a high-level overview of the following: (A) the proposed field development plan: (B) the proposed date for the commencement of petroleum production: (C) the economic model for the project:		
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	(D) the proposed duration of the proposed mining permit: (E) decommissioning plans: (j) if the proposed approvals include a mining permit for minerals other than petroleum,— (i) a map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates: (ii) for minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted: (iii) whether the application will be for a Tier 1 or Tier 2 permit: (iv) an estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology):		
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	(v) an indicative mine plan: (vi) a high-level overview of the following: (A) the proposed mining method: (B) the proposed date for the commencement of mining and estimated annual production: (C) the economic model for the project: (D) the status of or anticipated timing for completing any prefeasibility or feasibility studies: (E) the proposed methods for processing mined material and handling and treating waste: (F) anticipated plans for mine closure and rehabilitation. (2) For the purpose of subclause (1)(j)(iv), for a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.		
43(2)(b)	if the project is planned to proceed in stages,— (i) an outline of the nature and timing of the stages; and (ii) a statement of whether a separate substantive application is to be lodged for each of the stages; and	N/A	N/A

	(iii) an explanation of how each stage meets the criteria in section 22:		
43(2)(c)	the information that the applicant provided to the Minister when applying to have the project listed as a listed project and an explanation of how the substantive application is within the scope of the listed project.	Part A.11 Fast-track Approval Requirements, Section 11.4, pp. 505. Part K MP4 Listed Project Information	Addressed, as referenced.

Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

1. **Consultation with Otago Regional Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)
- Change or cancellation of resource consent condition (section 42(4)(b) of the Act)

ORC responded to the EPA on 17 September 2026; their response can be found published alongside this memorandum.

2. **Consultation with Dunedin City Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)
- Change or cancellation of resource consent condition (section 42(4)(b) of the Act)

DCC responded to the EPA on 17 September 2026, their response can be found published alongside this memorandum.

3. **Consultation with Waitaki District Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991:

- Resource consent (section 42(4)(a) of the Act)
- Change or cancellation of resource consent condition (section 42(4)(b) of the Act)

WDC responded to the EPA on 17 September 2026, their response can be found published alongside this memorandum.

4. Consultation with the Department of Conservation as the administering agency for the following Acts:

- An approval, a dispensation, or an authorisation under the Freshwater Fisheries Regulations 1983 or the Conservation Act 1987 in respect of a complex freshwater fisheries activity (section 42(4)(j) of the Act)
- A wildlife approval as defined in clause 1 of schedule 7 of the Act (section 42(4)(h) of the Act)

DOC responded to the EPA on 17 September 2026; their response can be found published alongside this memorandum.

5. Consultation with the Heritage New Zealand Pouhere Taonga as the administering agency for an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 (section 42(4)(i)).

Heritage responded to the EPA on 17 September 2026; their response can be found published alongside this memorandum.

A meeting was held at the Applicant's request in relation to the feedback Heritage provided. A record of this meeting can be found below. The meeting and the information shared within the meeting did not impact the completeness assessment.

From: Ethan Glover [REDACTED]
Sent: Monday, 21 September 2026 5:34 pm
To: Alison Paul; Emma Fahey
Subject: RE: Completeness review

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Emma,

Thanks for your time this afternoon. Set out below for your records is a summary of the key points discussed in relation to HNZPT's feedback regarding completeness.

1. We noted that HNZPT's letter left us with some concern that they had missed some key information contained in the application. For example, the CV of Mr Cook provided at B.43G which you had already identified.
2. We agreed that test pitting to further clarify the extent of Chinese Miners Camp (I42/50) would not be practicable or required prior to confirming the application as complete.
3. OGNZL's consultation with HNZPT included exchange of draft assessments and conditions and email correspondence from Emma Clifford on 21 July 2026 indicated that the authority conditions should provide for the investigation of the area identified as the extension Chinese Miners Camp. This implied to us that confirmation of the extent of the Chinese Miners Camp could come later.
4. The Archaeological Assessment prepared by Origin follows HNZPT's guidelines and provides a level of assessment equivalent to that provided in other Fast-track applications that Origin have been involved in.

Look forward to hearing from you.

Kind regards,

Ethan

Ethan Glover
Associate